

OFFICE OF CHIEF ACCOUNTABILITY OFFICER
Summary of State Board of Education Agenda Items
September 20, 2018

OFFICE OF DISTRICT AND SCHOOL PERFORMANCE

02. Action: Approval to revise the Mississippi Public School Accountability Standards, 2018, specifically, the business rules of the Mississippi Statewide Accountability System effective for the 2017-2018 school year to reset the baseline scores in accordance with current State Board of Education policy for schools with Grade 12 and to assign a grade classification to all schools [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]
(Has cleared the Administrative Procedures Act process with public comments)

Background Information: The State Board of Education (SBE) established baseline scores for assigning district and school grade classifications based on 2016-2017 student performance data. The 2016-2017 growth calculations for schools with Grade 12 included data from the Partnership for Assessment of Readiness for College and Careers (PARCC) administered in 2014-2015 and the Mississippi Academic Assessment Program (MAAP) administered in 2016-2017.

On August 9, 2018, the Mississippi Department of Education (MDE) presented the 2018 Preliminary Accountability Results to the Technical Advisory Committee (TAC) for review. To address the lack of comparability to growth scores in prior years and as a result of measuring growth by the use of three (3) different high school assessments over a three (3) year period, the TAC recommended the MDE reset the baseline scores in accordance with current SBE policy for schools with Grade 12 effective school year 2017-2018. Resetting the baseline for schools with Grade 12 will reflect the continued gains students are making on the MAAP assessments and establish a more accurate comparison of student performance and growth.

The Commission on School Accreditation (CSA) met in a special-called meeting on August 14, 2018, and approved the TAC recommendation to revise the business rules of the Mississippi Statewide Accountability System effective for the 2017-2018 school year. The revisions include resetting the baseline scores in accordance with current SBE policy for schools with Grade 12 and assigning a grade classification to all schools.

On August 16, 2018, the SBE approved the CSA recommendation to assign a grade classification to all schools, but remanded the CSA's recommendation to reset the baseline scores for schools with Grade 12 back to the CSA for further deliberation as a result of Commission members expressing concerns regarding the limited amount of time provided to review and deliberate over the recommendation of the TAC to reset the baseline scores.

In a special-called meeting on August 22, 2018, the CSA unanimously reaffirmed its decision to reset baseline scores in accordance with SBE policy for schools with Grade 12 effective for school year 2017-2018.

In a special-called meeting on August 23, 2018, the SBE granted approval of a temporary rule and to begin the APA process to reset the baseline scores in accordance with SBE policy for schools with Grade 12 effective school year 2017-2018.

The temporary rule and final action was necessary to implement the revisions to the business rules for the Mississippi Statewide Accountability System effective for the 2017-2018 school year immediately upon its filing with the Secretary of State in accordance with Miss. Code Ann. § 25-43-3.113(2)(b)(ii). For a rule to become effective immediately upon its filing, the SBE is required to make a finding that the rule only confers a benefit or removes a restriction on the public or some segment thereof.

The public comment period was open through 5:00 p.m. on September 17, 2018. The back-up materials provided in this board item include all comments received. A total of 55 comments were received. Of the 55 comments received 19 were in support of the proposed changes and 29 opposed the proposed changes. Additionally, seven (7) comments were received that were considered to be “off-topic” as they were unrelated to the proposed revisions to the business rules of the MS Statewide Accountability System. No changes are recommended based on the public comments received.

A Summary of Comments document is included as part of the back-up material for the comments received. The off-topic comments are not included in the chart.

This item references Goals 1, 2, 3, 4, 5, and 6 of the *Mississippi Board of Education 2016-2020 Strategic Plan*.

Recommendation: Approval

Back-up material attached

Mississippi Statewide Accountability System: Business Rules

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. (Miss. Code Ann. § 37-17-6)
- 1.2 Grades for schools (and districts) with no 12th grade (elementary/middle schools) will be determined based on the following cut-points effective with the 2016 – 2017 school year:

		A	≥	442
377	≤	B	<	442
328	≤	C	<	377
269	≤	D	<	328
		F	<	269

- 1.3 Grades for schools with a 12th grade will be determined based on the following cut-points effective with the 2016 - 2017 school year:

		A	≥	-787
-679	≤	B	<	-787
-612	≤	C	<	-679
-547	≤	D	<	-612
		F	<	-547

		A	≥	90 th Percentile*
63 rd Percentile*	≤	B	<	90 th Percentile*
38 th Percentile*	≤	C	<	63 rd Percentile*
14 th Percentile*	≤	D	<	38 th Percentile*
		F	<	14 th Percentile*

*Numerical values will replace percentiles following the appeals’ decisions and the final calculations of the accountability model.

- 1.4 Grades for districts will be determined based on the following cut-points effective with the 2016 – 2017 school year:

		A	≥	668
599	≤	B	<	668
536	≤	C	<	599
489	≤	D	<	536
		F	<	489

- 1.5 Assignment of district grades will be calculated by treating the district as one (1) large school based on the same grading assignments used for schools.
- 1.6 Cut-points for schools/districts will be reviewed following the implementation of a new assessment.

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 in the same or different school on the same day, the student will be considered as having been enrolled for one (1) day in the receiving school.
- 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 meet FAY at the school/district if the movement of the student appears to be within the same school/district.
- 2.10 If a student drops out of school and re-enrolls within the same school year, the re-entry date of the student will be included as the next enrollment date for the student.

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 ten (10) valid test scores in each of the required components. Schools that do not have the minimum of ten (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 ten (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. will have data from prior years combined with the current year (up to three years of data) in order to achieve the minimum N-count.~~ (See Sections 15, 22 and 24 for exceptions to this rule.)

3.2 Lowest Performing Students Subgroup N-Count Minimums

- 3.2.1 This subgroup must have a minimum of ten (10) valid test scores. If there are less than ten (<10) students in the Lowest Performing Students 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 ten (<10), then ALL students will be included in the calculation of the Lowest Performing Students subgroup.
- 3.2.2 At the grade-level, a minimum of four (4) students with valid scale scores are required to identify the Lowest Performing Students. If a grade has less than four (<4) students with valid scale scores for the subject, there will be no students identified as being in the Lowest Performing Students for that grade level for that subject.

Note: See Section 7 for more information on the Lowest Performing Students subgroup.

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.
 - 4.4.1 For the 2013-2014 school year, the Senior Snapshot process used for calculating participation rates in high school level end-of-course assessments will remain consistent with previous years. Beginning with the 2014-2015 school year, U.S. History will be included in the participation rate calculations. (Refer to rule 4.5 for additional clarification.)
- 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.
- 5.1.1 For proficiency components worth fifty (50) points, the weighted percentage of students proficient will be multiplied times 0.5 to determine the points applied to the component.
- 5.1.2 The science proficiency component for schools with a 12th grade will be based on all science assessments administered at that school. Therefore, for schools with a 12th grade that also have a 5th and/or 8th grade, the science component for that school will still be worth fifty (50) points.
- 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 Proficient from one (1) year to the next
 - An increase within the lowest three (3) performance/proficiency levels that crosses over the mid-point of the level. (Example: Bottom half of Basic to top half of Basic)

Following the implementation of new assessments, a linking/equating process will be used to establish comparable scales across the new and old assessments and to determine the criteria for meeting growth as defined above.

- 6.2 Additional weight in the numerator is given for the following increases:
- Staying at Advanced from one (1) year to the next will be given a weight = 1.25.
 - Any increase of two (2) or more performance/proficiency levels will be given a weight = 1.25.
 - Any increase to the highest performance/proficiency level will be given a weight = 1.25.

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 three (3) 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 thirteen (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 three (3) performance/proficiency levels into half at the mid-point range is not intended to create three (3) 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.

Note: Rules regarding the splitting of the lowest three (3) 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 English Language Arts;
 - Grade-level (3-8) assessments in Mathematics;
 - High School level assessments in English Language Arts;
 - High School level assessments in Mathematics;
 - Alternate Assessments (3-8 and High School) in English Language Arts; and
 - Alternate Assessments (3-8 and High School) in Mathematics.

Note: 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 Federal regulation 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-Lowest Performing Students, Reading-All Students and Reading-Lowest Performing Students, 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 assessments for the Mississippi College- and Career-Readiness Standards, if a student comes to Mississippi from another state and has taken the same assessment as the one 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 an assessment (in another state) that is different from the assessments given in Mississippi, he/she will not have a growth calculation.

7. **Lowest Performing Students**

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

7.1.1 The Lowest Performing Students subgroup in reading and the Lowest Performing Students subgroup 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 performing the students in a school is applied separately by grade, and the identified students are combined across all grades to comprise the Lowest Performing Students subgroup and to determine learning gains.

Note: The Lowest Performing Students subgroup will be determined by identifying the percentage (e.g., 25%) of students, as defined by Miss. Code Ann. § 37-17-6, who are the lowest performing students in a given subject area.

The process:

1. Beginning with the 2014-2015 school year, the scores of all students participating in the general education and alternate assessments will be standardized by subject area, grade level, assessment type, and school year.
2. Sort the standardized scores of all FAY students in a grade from highest to lowest based on their prior year standardized scores. Students without an eligible score from the previous year are not included. (See Section 6. Growth and Rule 7.1.3 for additional clarification.)
3. 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.
4. Count, from the lowest score up, the number of students identified in step 3. Then identify the standardized score that corresponds to that student. This standardized score becomes the boundary score.
5. Identify all students with the boundary score determined in step 4. All students with the same boundary score or lower standardized score will be included in the : Performing Students subgroup for that subject/grade.
6. Repeat the process for each grade for the subject then combine students to form the Lowest Performing Students subgroup for the school for the subject.

Note: The number of students in the Lowest Performing Students subgroup 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 Performing Students subgroup to be more than 25% when steps 5 and 6 are applied.

7.1.2 Deleted

7.1.3 The Lowest Performing Students subgroup for schools whose highest grade is lower than 4th grade will be identified based on the students who attended the school, not based on their 4th grade school's Lowest Performing Students subgroup. Therefore, a student may be identified in the Lowest Performing Students subgroup in one (1) school, but not the other.

* The Mississippi Statewide Accountability System determines 25% of the student population by multiplying the number of students by 0.25.

- 7.2 The Lowest Performing Students subgroup for a district will be identified using the same method described above [i.e., the district will be calculated as if it were one (1) school]. Therefore, it is possible that some students may be identified as members of the Lowest Performing Students subgroup for their school but not for their district, or for their district but not their school.
- 7.3 The Lowest Performing Students subgroup for the state will be identified using the same method [i.e., the state will be calculated as if it were one (1) school].
- 7.4 Deleted

8. **Graduation Rate**

- 8.1 The federally-approved four-year graduation rate will be used. (Miss. Code Ann. § 37-17-6)
 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 (4) 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 Deleted
- 8.3 The schools/district graduation rate will be multiplied by 2.0 to calculate the points applied to the graduation component for schools/districts.
- 8.4 The methodology used for the calculation of the graduation rates for schools/districts are outlined in the *Graduation Rates Technical Manual*.
- 8.5 The school/district graduation rate applied in the graduation component is lagged one year.

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 three (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 (2) components will be combined for one (1) score worth fifty (50) points and phased in on the following sliding scale:
 - a. Year 1 (2015-2016): $(\text{Participation}-70\%/\text{Performance}-30\%) \div 2$
 - b. Year 2 (2016-2017): $(\text{Participation}-60\%/\text{Performance}-40\%) \div 2$
 - c. Year 3 (2017-2018) and beyond: $(\text{Participation}-50\%/\text{Performance}-50\%) \div 2$
- 9.4 Calculation of Participation

- 9.4.1 The numerator for the Participation component calculation will be the number of students taking accelerated courses and/or related exams 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 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. (9th and 10th grade 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 and/or tests identified in the participation calculations.
 - 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.
- 9.7 In the calculation of participation, 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 U.S. 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 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 the district before or during their 10th grade year, his/her scores (achievement and growth) will not be applied to the school of origin or receiving school in the new district.
Note: Refer to Section 4 (Participation) and 6 (Growth) for additional information.

11. Focus Schools

- 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. (Miss. Code Ann. § 37-17-6)
- 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. (Miss. Code Ann. § 37-17-6)

- 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

- 12.1 Schools identified as “F” schools for two (2) consecutive years will also be identified as “Priority” schools. (Miss. Code Ann. § 37-17-6)
- 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. (Miss. Code Ann. § 37-17-6)
- 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

- 13.1 Schools identified as “A” schools will also be identified as “Reward” schools. (Miss. Code Ann. § 37-17-6)
 - 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)

- 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 Deleted

15. English Learners (EL)

- 15.1 Scores of English learners (EL) will be included in all calculations (e.g., Proficiency, Growth—All Students, Growth—Lowest Performing Students) UNLESS the district requests that the scores of an English learner who has attended a U.S. school for less than 12 months be excluded. The scores of English learners who have attended a U.S. school for less than 12 months will only be included in the participation calculations. (For more information on English learners who have attended a U.S. school for less than 12 months, contact the Office of Federal Programs.)
 - 15.1.1 Local Education Agencies (LEA) must identify English learner students, who have attended a U.S. school for less than 12 months, to be designated for exclusion on or before February 1, annually. (For more information, contact the Office of Federal Programs.)
 - 15.1.2 Deleted
 - 15.1.3 Any English learner 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.
- 15.2 An EL performance component will be calculated for each school and district beginning with the 2017 - 2018 school year and will be included in the calculation of accountability grades beginning in the 2018 - 2019 school year. The EL performance component will

- be equal to the average EL progress rate of students as defined in 15.4, multiplied by the total points assigned to the EL component for that school/district.
- 15.2.1 Each school or district must meet the minimum N-count for EL students in order to have an EL performance measure calculated.
 - 15.2.2 The performance measure will be equal to 5% of total available points in the accountability system. All other components will be reduced by a total of 5% cumulatively when the EL performance measure is included.
 - 15.2.3 The component score for districts and schools will be adjusted such that an average student rate of 0.9 or higher shall receive the maximum score for this component. This adjustment will be applied uniformly to all other averages below 0.9, effectively increasing each value by 10 percent.
- 15.3 Progress toward proficiency will be calculated for all EL students using the state English Language Proficiency Test (ELPT). An annual progress goal will be calculated for each student based on reaching proficiency on the ELPT within five years of entry into an EL program or by high school graduation. The annual progress goal will be equal to the minimum score needed to achieve proficiency (at year five or graduation), minus the prior year score, divided by the number of years the student had remaining to exit the EL program in the prior year.
- 15.3.1 In year 5 and beyond, the annual progress goal is equal to the minimum score needed to achieve proficiency, minus the prior year score.
- 15.4 EL performance will be measured by the annual progress achieved by EL students. Each student will have a rate ranging between 0 and 1 based on the student's current year ELPT score, minus the prior year score, divided by the annual progress goal as defined in 15.3. Any student who does not demonstrate progress will have a rate of 0. No student will receive a rate higher than 1.
- 15.4.1 The student must meet FAY requirements in the current year but is not required to meet FAY requirements in the prior year.
 - 15.4.2 The student must have a prior year score to be included in the calculation.
 - 15.4.3 Any student not exiting the EL program within five years will have a reduction in the calculation of the progress rate based on the following schedule:
 Year 6, the student progress rate defined in 15.4 will be multiplied by 0.75
 Year ≥ 7 , the student progress rate defined in 15.4 will be multiplied by 0.50

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.
- 16.2 All eligible SCD students will be expected to participate in statewide assessments per the schedule provided by the Office of Student Assessment. (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 (2) valid assessment scores for the same assessment on the same date, the higher of the two (2) 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 – Lowest Performing Students	80.5
Math Proficiency	80.5
Math Growth – All Students	80.5
Math Growth – Lowest Performing 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.
- 20.2 Consolidated districts/schools who maintain the same grade configuration and/or student population as existing in the previous school district will receive the eligible scores or statuses of students who previously attended the school in the previous school district.

21. Alternative, Career, Technical, and 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, Pre-K through 2nd grade School:

- Reading and Math Proficiency - The reading and math scores from students in 3rd grade who attended the Pre-K through 2nd grade school and are still in the same district will be used to calculate the math and reading proficiency for Pre-K through 2nd grade 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 4th grade who attended the Pre-K through 2nd grade school and are still in the same district will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-Lowest Performing Students, and Math-Lowest Performing Students for that Pre-K through 2nd grade school. The students would have to have met FAY in
 - the Pre-K through 2nd grade school during 2nd grade,
 - the 4th grade school in the same district, and
 - any school within the same district during 3rd grade.

Example 2, Pre-K through 3rd Grade:

- 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 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 4th grade who attended the Pre-K through 3rd grade and are still in the same district will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-

Lowest Performing Students, and Math-Lowest Performing Students for Pre-K through 3rd grade.

- All applicable FAY rules will apply.

Example 3, Pre-K through 4th Grade:

- Reading and Math Proficiency - The reading and math scores from students in 3rd and 4th grades at the school will be used to calculate the math and reading proficiency for Pre-K through 4th grade.
- Science Proficiency - An equating process will be used to adjust the scores for this component.
- Growth - The reading and math scores from students in 3rd and 4th grades at the school will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-Lowest Performing Students, and Math-Lowest Performing Students for Pre-K through 3rd grade.
- All applicable FAY rules will apply.

Example 4, 6th and 7th grade:

- Reading and Math Proficiency - The reading and math scores from students in 6th and 7th grade 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 6th and 7th grade at the school will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-Lowest Performing Students, and Math-Lowest Performing Students for 6th and 7th grade.
- 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.

22.1.3 Beginning with the 2014-2015 school year, the cut-points established for elementary/middle schools that do not have science scores will remain static in succeeding years. The cut-points will be reviewed following the administration of a new assessment.

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~~ the school grade label of the next level school to which that school feeds. If the school feeds to multiple schools, the grade will be assigned from a weighted average of the composite scores of the schools to which it feeds.

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.

- 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 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.
- 23.1.4 For students enrolled at MSMS or MSA, the school/district of origin is defined as the school/district where the student was enrolled and met FAY requirements in the school year immediately prior to enrollment at MSMS or MSA.
- 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.)~~
- 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 schools (special private schools; i.e., Millcreek, CARES, etc.) but are enrolled in regular Mississippi public schools will have their 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 USDE’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 following rules will apply only if the state legislature mandates statewide ACT testing and appropriates funding for such testing.

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

- 25.2 The College & Career Readiness component will be comprised of a Mathematics and an English/Reading component. These two (2) components will be equally weighted and combined for one (1) score worth fifty (50) points: $(\text{Math} + \text{English/Reading}) \div 2$
- 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.
- 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 English/Reading, as described above, will be used in the College & Career Readiness Indicator accountability calculations.
 - 25.7.1 Students included in the Senior Snapshot will have until February (pending availability of data) of the academic year to participate in the ACT and have their highest subscores in English/Reading and Mathematics included in the College- and Career-Readiness Component.
- 25.8 Contingent upon legislative funding, the state will pay for one (1) statewide 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 DELETED.
- 25.10 DELETED.
- 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.
- 25.13 The participation rate numerator will include the state administration or non-state administration of the ACT. The denominator will include all students in the Senior Snapshot.
- 25.14 The denominator for the College- and Career-Readiness component calculation will consist of all students participating in the ACT as identified in the participation calculations.

26. *Senior Snapshot*

Senior Snapshot is a method of identifying high school students for the high school assessment participation rate calculation and College and Career Readiness measures. Senior Snapshot captures ALL students who have been enrolled in a MS public school starting in month 1 of the 10th grade and continuing without interruption until either the end of month 9 of the 12th grade or until a completion status is entered, whichever comes first. If the student does not meet the enrollment criteria, he/she will not be included in the denominator for participation rate calculations or College and Career Readiness measures.

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 Deleted

Summary of Administrative Procedures Act (APA) Comments

The Office of Accountability received the following APA comments in favor of the proposed revisions to the *Mississippi Public School Accountability Standards, 2018*. Comments are summarized; complete submissions follow this table.

Summary of Comment
"It was done fairly and equitably for all districts."
"There is no question that the cuts need to be updated."
"This is a necessary adjustment to accurately capture realistic performance. This is what is best for our state at this point. It is time for MDE to establish a set cut score for all schools and districts, so we can "know" the target."
"I am in favor of the proposed changes to the high school accountability model."
"I believe that this year's proposed revision of cut scores is needed."
"The inflation that occurred to the 2017 baseline scores due to the high school having a PARCC to MAAP growth year certainly needed to be addressed. Overall school district baseline scores were also impacted by the same legitimate concerns."
"I support the proposed baseline resetting process for the 2017-2018 accountability results for the following reasons: 1) The 2016-2017 accountability results for 1000 point schools were based upon two different Algebra I tests; 2) Growth inflation affected 20% of the components used in the model for 1000 point schools; 3) In 2017-2018, MDE and schools were finally able to have valid growth comparisons; 4) Data show increases in proficiency and growth for students in Algebra I when compared to their 8 th grade performance. However, if cut scores from 2016-2017 are used, this does not accurately reflect that student performance increased. Therefore, I support the resetting of baseline scores to show the accurate growth of our students and schools."
"Unless cut scores are reset, only seven 1000-point schools will be eligible to receive a letter grade of A. NAEP scores are rising. MAAP Math proficiency is rising. Grade-level performance classification would be representative of the actual data as well. I believe a resetting of these cut scores is the right thing to do and I am so pleased that MDE is working towards this."
"I believe it wise to adjust the cut scores because growth last year obviously skewed the data. There can be no fair 1,000-point scale if we do not take into account all the unique 1,000-point school configurations."
"Using the percentiles is a much better rule of measure versus changing the cut scores each year."
"Thank you for the opportunity to express my support of revising the business rules as it relates to the resetting of baseline scores. If the baseline scores remain, the students would be adversely affected. I understand the state board's apprehension to changing the baseline scores. As opportunities change, does it not make sense that our model would do likewise?"
"The current model is severely flawed because we are paying more attention to increasing student achievement not less. I am requesting the state lower cut scores for high schools."

Summary of Administrative Procedures Act (APA) Comments

Summary of Comment
"By resetting the cuts, the MDE is coming closer to reflecting what is occurring in high schools. Instruction has consistently improved as shown by increased NAEP scores, high school proficiency, graduation rate, acceleration, and college and career readiness performance. Therefore, I fully support that cut scores need to be revised to accurately reflect the performance in schools."
"I am in favor in general of adjusting scores when necessary to offset statistical anomalies as well as adjust for things such as test changes that will occur over time as is the nature of the beast of testing."
"By resetting the cuts, the MDE is coming closer to reflecting what is occurring in high schools. Instruction has consistently improved as shown by increased NAEP scores, high school proficiency, graduation rate, acceleration, and college and career readiness performance. Therefore, I fully support that cut scores need to be revised to accurately reflect the performance in schools."
"I support the change because no school is negatively impacted but adamantly disagree with the use of arbitrary percentiles in determining the cut points."
"... to provide support for moving the cut points. We have a model which is very volatile."
"Thank you for noticing that the grading system for our schools is not reflective of the many improvements that our students and schools experienced this past school year since test scores improved and grade levels for schools decreased. I believe the current system for re-establishing the baseline should consider other factors before considering the percentile ranks only due to the potential need to reset these scores each year. While changing the cut scores this year to the proposed changes is more closely reflective of actual performance, I look forward to investigating and exploring ideas that may improve upon our current accountability grading system."
"All scores should be reset every year to establish baseline targets for each grade label for schools and districts and to encourage a spirit of collaboration and support among districts."

Summary of Administrative Procedures Act (APA) Comments

The Office of Accountability received the following APA comments in opposition to the proposed revisions to the *Mississippi Public School Accountability Standards, 2018*. Comments are summarized; complete submissions follow this table.

Summary of Comment	MDE Response
<p>“It would be irresponsible for me, as an educator, to adjust the grades of students so a certain percentage have As, Bs, Cs, etc. because the performance of students this year was not as good as last year. No one would be able to tell accurately how much a student learned. I urge the MDE to set static grading standards rather than continually moving the target for districts. Setting static grading standards also ensures a more accurate portrayal of academic achievement across Mississippi schools.”</p>	<p>Grade labels are established based on performance-level descriptors that establish minimum performance expectations for each grade label assignment. The baseline year is established in a comparative approach that sets a distribution inclusive of all grade levels and identifies both the highest performers and the lowest performers in the given population. Given consistent inputs, the established norm would continue in subsequent years.</p>
<p>“The accountability ratings are having to be reset in large part to school districts being able to manipulate accountability ratings with the acceleration component in the framework. I do not think scores need to be reset. Dual credit students with a grade of C or higher as administered by the high school teacher working as an adjunct for the community college, does not carry the same weight as the AP or IB requirements. Other schools are potentially watering down the expected outcomes for students to get good grades. If a school district can have over 1,000 students participating in dual credit and that raises the district from a B to A, is that a reflection on the community college or the school? Without the acceleration piece, the scores would remain more stable. Percentile model as it suggests MS will always have failing schools. A baseline number that aligns with national standards, so districts know what they need to do for improvement.”</p>	<p>The need to reestablish the baseline for 1000-point schools in 2018 was caused by inconsistent measures of growth, not by the acceleration component.</p>
<p>“.....never ending changes of the accountability ratings for the school district ratings are essentially determined by percentages that have been changed often. Teachers and administrators are shooting at an unknown target. Raw data should be used to determine the various categories of A through F. How many points they would have to make to improve enough to move up to a higher rating? There would not be any set percentages to determine the ratings. It would be determined by the raw numbers. Required curriculum changes invalidate the tests that are currently in use. There should be separate tests administered</p>	<p>While it may be necessary to adjust composite outcomes in years of significant instability, adjustments would not be expected for years with minor changes to data inputs. Data are only included that are valid and reliable.</p>

Summary of Administrative Procedures Act (APA) Comments

Summary of Comment	MDE Response
<p>for 3 or more years before these test results become a part of the ratings. Hold harmless methods that are presently used when new curricular changes are required are not based on valid data. Stability is a must in programs of teaching and testing. SDE will take “care” of them by adjusting the ratings based on percentage technique.”</p>	
<p>“Adjusting scores each year with a Bell curve restricts some schools from ever reaching the A level. To say that a certain percentage of schools are going to be a failure next year, no matter what happens, sets a school up for disaster and futility. Lower cut scores to 2016 ratings and be done with it.”</p>	<p>This is expected to be the final year with inputs from multiple assessment types. It is the expectation of the MDE that the baseline be established using valid data that can be expected to represent performance in subsequent years.</p>
<p>“Once again MDE is considering changing the cut scores to increase the number of F’s and decrease the number of A’s on the high school tests, instead of showing the actual improvements achieved. We are already feeling disrespected. Especially at the high school level, these tests are ridiculous to begin with. Stupid decision.”</p>	<p>The proposed changes only improve the grade label assignment of high schools. No schools are negatively impacted.</p>
<p>“.....grieved about MDE Education Board and Commissioners intent to change the cut scores and MS School Accountability System rating by increasing cut scores and assigning “A to F” school ratings based on percentages not school performance.”</p>	<p>The proposed changes only improve the grade label assignment of high schools. No schools are negatively impacted.</p>
<p>“I am opposed to it. It does not throw a positive light on our state when we set expectations and lower them after the fact.”</p>	<p>The observed results using the 2016-2017 baseline are not representative of the performance of high schools, that is the reason for the change.</p>
<p>“Everyone knew that the high school model would have to be changed again. Why are we putting it above the 736 or so that was originally set as the top 10% when done with regular growth and no bridge scale? It appears the score should be put back to a 736 since that was the top 10% that it was originally set at. It almost appears that we are not being measured against a standard, but instead against one another. Seems like we would adjust the district cut score. That is my concern with constantly looking at the top 10%. Lurking is the addition of the English as a Second language portion. We were never shown any impact data prior to this being put into the accountability model. First, these students are already included in proficiency, growth for all, and lowest performing student’s growth rate. There is an issue of equity. This is a major impact. Please review the negative impact</p>	<p>The proposed changes only improve the grade label assignment of high schools. No schools are negatively impacted</p>

Summary of Administrative Procedures Act (APA) Comments

Summary of Comment	MDE Response
<p>that this data will have on individual schools and districts across the state and revise the model to be fair and equitable for all.</p>	
<p>“Cut scores are constantly being moved. Mendenhall High School experienced tremendous growth and academic progress moving from a “D” level to a “B” level. This resetting will have a negative impact on several schools. MDE uses the same percentile rankings to determine school and district ratings with a predetermined quota. If we are going to reset anything, it should be the entire accountability system we are using. We should spend time revamping the entire system as opposed to continuing to reset the cut scores. Mendenhall High, our top performing high school, will regress under these proposed cut scores. It will go from a “B” to a “D” level.”</p>	<p>The proposed changes only improve the grade label assignment of high schools. No schools are negatively impacted.</p> <p>Under the 2016-2017 baseline, this school would be rated an F.</p>
<p>“MDE is formalizing a practice that has been in place since schools and districts have been receiving accountability ratings under the current accountability model.....referring to the renorming or changing a school’s or district’s accountability rating from a specific score range to a range based on percentile rank. Schools and district were focused on improving their school or district to reach the score that would get them to the next higher rating. The fear of these possibilities has led to an environment in which schools and districts are increasingly resistant to collaborate and share effective practices with one another. Continuing to rank schools and districts on this suggested percentile continuum will insure that fourteen percent of schools and districts will received a ranking of F and 24 percent of schools and districts will received a ranking of D. Change in the business rule would render goal 6 unattainable. A school’s or district’s perceived effectiveness if solely based on the accountability rating that is assigned by MDE. By formalizing and continuing this practice of renorming accountability ratings based on percentile ranks will continue to perpetuate an unhealthy competitive environment in Mississippi’s public education.”</p>	<p>Grade labels are established based on performance-level descriptors that establish minimum performance expectations for each grade label assignment. The baseline year is established in a comparative approach that sets a distribution inclusive of all grade levels and identifies both the highest performers and the lowest performers in the given population. Given consistent inputs, the established norm would continue in subsequent years.</p>
<p>“A seemingly entrenched pattern of resetting cut scores has compromised the validity of the accountability system in the minds of the public. Continuing to insist on the use of arbitrary percentile rankings – a practice that inflicts a failing rating on 14% of schools, regardless of how schools perform – is an illogical method of grading schools and districts that parents and educators alike find abhorrent. Percentile rankings encourage competition, rather than collegiality, among schools. We believe the use of percentile rankings falls outside the bounds of ethical treatment of public schools and should be abolished.”</p>	<p>Only the baseline of the 1000-point schools is being reestablished. The district and 700-point cuts are remaining unchanged. Percentile rankings that were established in 2016 are not arbitrary but were established through nationally recognized best practices in standard-setting and based on performance level descriptors.</p>

Summary of Administrative Procedures Act (APA) Comments

Summary of Comment	MDE Response
<p>“If scores are continually reset, the validity of said scores is jeopardized. If scores are being reset to accommodate certain schools and make their scores look better, that is egregious and incomprehensible.”</p>	<p>This is expected to be the final year with inputs from multiple assessment types. It is the expectation of the MDE that the baseline be established using valid data that can be expected to represent performance in subsequent years.</p>
<p>“I sincerely request that the high schools cut scores’ formula that is to be voted on today be reconsidered. Restructure the model used to determine these test scores, in order that ALL students of our great state are successful.”</p>	<p>Accountability results should accurately reflect the performance of schools and districts. It is not a representation of individual students or teachers.</p>
<p>“I strongly believe that the validity of the accountability system in the eyes of the public has been comprised. Last year our school rating was an A. This year, we have made gains, but with the new cut scores, we have a B rating.”</p>	<p>The proposed changes only improve the grade label assignment of high schools. No schools are negatively impacted.</p>
<p>“It is inherently unfair to move the target after the test is taken. With the proposed changes, we are no closer to a concrete model with consistent targets which would provide teachers and districts with precise goals.”</p>	<p>The proposed changes only improve the grade label assignment of high schools. No schools are negatively impacted.</p>
<p>“It only matters that your school’s or district’s score is higher than 90%, 63%, 38%, or 14% of the other schools or districts. This has fostered a competitive environment where schools and districts feel it is no longer mutually beneficial to share instructional information or best practices with each other. I feel it would be appropriate to respectfully ask MDE’s consideration in revising State Board of Education Goal number 6 which states “Every School and District Rated “C” or Higher”. It is my stance that by formalizing and continuing this practice of re-norming accountability ratings based on percentile ranks will continue to perpetuate an unhealthy competitive environment in Mississippi’s public education.</p>	<p>This is expected to be the final year with inputs from multiple assessment types. It is the expectation of the MDE that the baseline be established using valid data that can be expected to represent performance in subsequent years and remain unchanged.</p>
<p>“It is not fair to the public, parents, or schools that it is predetermined that 10% will receive A’s, 27% will receive B’s, 25% will receive D’s, and 14% will receive F’s, regardless of how students perform.”</p>	<p>The proposed changes only improve the grade label assignment of high schools. No schools are negatively impacted.</p>

Summary of Administrative Procedures Act (APA) Comments

Summary of Comment	MDE Response
<p>“Using percentile rankings implies that the test is norm-referenced. The state assessments supposedly are criterion-referenced assessments designed to measure a set of standards selected by the State. Changing the number of raw score points to reach proficiency implies there was an equating issue with the assessment. Excessive changing each year makes it impossible to actually determine progress.”</p>	<p>Performance measures for assessment are different from performance measures for accountability. Accountability measures are norm-referenced in the established baseline year. It would be inaccurate to compare standard-setting for assessments with standard-setting for accountability.</p>
<p>“As a parent of a 6th and 7th grader, I am against this proposal. Our kids came home to us stressed out and worrying that even though they passed the class, would they get held back because of a mandated test.”</p>	<p>(The respondent’s rationale for opposition is off-topic.)</p>
<p>“The resetting is counter-productive and even unethical when used statewide year after year. Please note that this resetting is blatantly in violation of our primary role as education professionals. Baseline changes are not a good response to the lack of sound research and assessment design.”</p>	<p>This is expected to be the final year with inputs from multiple assessment types. It is the expectation of the MDE that the baseline be established using valid data that can be expected to represent performance in subsequent years and remain unchanged.</p> <p>The proposed change is not related to the design of the MAAP, rather it is in response to changing assessment types used to calculate growth for high schools.</p>
<p>“We respectfully request that the State Board of Education re-evaluate the appropriateness of resetting cuts using percentiles based on pre-MAAP assessments. Given that the percentiles were established on data that did not include MAAP-to-MAAP comparisons, it would seem appropriate to revisit the Performance Classification Descriptors. Established by the initial Task Force to ensure that the cut points and percentiles adequately reflect the intended descriptors for school performance.”</p>	<p>Grade labels are established based on performance-level descriptors that establish minimum performance expectations for each grade label assignment. The baseline year is established in a comparative approach that sets a distribution inclusive of all grade levels and identifies both the highest performers and the lowest performers in the given population. If a standard-setting process was started to reestablish percentiles, the</p>

Summary of Administrative Procedures Act (APA) Comments

Summary of Comment	MDE Response
	outcome would likely be similar to the process used in 2016, as a similar distribution, inclusive of all grade levels would be necessary.
<p>“I am writing with concern about the raising of the test score requirement for students in the MS Delta. If you raise the requirements it will only make it harder for them to continue to pass these tests.”</p>	<p>Accountability results should accurately reflect the performance of schools and districts. It is not a representation of individual students or teachers.</p>
<p>“I strongly oppose the use of percentiles in setting of baseline scores, and I assert that such destroys the validity of the tests. The use of percentiles in setting scores is just plain offensive to me as a parent, a trained educator and a Mississippian. If a certain number of schools are going to receive an F or other rating regardless of the performance of the students on the test, then the test is unquestionably invalid. We will not be measuring the amount of knowledge the students were able to gain at school; we will instead only be comparing our schools against each other.”</p>	<p>State accountability systems that have summative ratings, especially those with an A-F grade are intrinsically designed to compare the performance of districts and schools against all others in the given population. Even with this requirement, Mississippi’s accountability system is not designed to reestablish norms each year. State law instead provides that norms be reestablished when 65% of schools and/or districts are earning a grade of “B” or higher. The requirement to reestablish a baseline for high schools is due to inconsistency in how growth has been measured since 2016.</p>
<p>“Several parents and I are upset with the resetting pattern. Our kids are already on edge with the scoring system as it currently is designed. Passing this bill will add more stress and increase the dropout rate among public school attendees.”</p>	<p>Accountability results should accurately reflect the performance of schools and districts. It is not a representation of individual students or teachers. Furthermore, the proposed changes do not negatively impact any schools.</p>
<p>“This will be the third consecutive year in which percentiles will be used to determine cut scores for Grade 12 schools. The business rules for accountability ratings for the 2017-2018 school year were published well in advance of the 2017-2018 school year. Schools and districts had ample time to prepare their teachers and students for the task at hand. Seven (7) grade 12 schools across the state reached the “A” level set by these cut scores.</p>	<p>This is expected to be the final year with inputs from multiple assessment types. It is the expectation of the MDE that the baseline be established using valid data that can be expected to represent performance in</p>

Summary of Administrative Procedures Act (APA) Comments

Summary of Comment	MDE Response
<p>They knew their target, knew what they needed to score, and they worked feverishly to hit that mark. Kudos to those students and teachers for making that happen. The percentile method changes all of this and moves schools that failed to reach their target in to the “A” grouping as well. Is this fair to the seven schools that achieved an “A” based on the criteria set way before the “game” began? Goal 6 states: Every School and District is Rated “C” or Higher. If that is the goal of MDE and the State Board of Education, then how will it ever be achieved if we continue to use a percentile ranking? If the final accountability decision has yet to be decided, why send out accountability ratings to the school districts and the media? What happens if the State Board decides not to uphold the revisions on September 20th?”</p>	<p>subsequent years and remain unchanged.</p> <p>It is imperative that accountability results accurately reflect the performance of schools and districts. Left unchanged, the grade assignments for high schools would be grossly skewed to the bottom of the distribution.</p>
<p>“I am dismayed at the plan to once again use percentile rankings. This system is arbitrary and unethical. Schools should be evaluated on their progress over rent years, rather than continuing to have their baseline moved.”</p>	<p>The proposed changes only improve the grade label assignment of high schools. No schools are negatively impacted</p>
<p>“It is my belief that resetting the cut scores would compromise our State data and undermine the overall validity of our state tests in terms of accurately measuring the successes and failures of our students.”</p>	<p>Accountability results should accurately reflect the performance of schools and districts. It is not a representation of individual students or teachers. Furthermore, the proposed changes do not impact test scores in any manner.</p>
<p>“The percentile ranking is an outdated, arbitrary, and irrational system of grading schools and districts.”</p>	<p>Percentile rankings that were established in 2016 are not arbitrary but were established through nationally recognized best practices in standard-setting and based on performance level descriptors. This grading system is in no way arbitrary.</p>
<p>“I have some definite concerns about assigning a grade to the school (MSB) on the basis of a state test score. Many MSB students come to the school after failing in public schools and some even have had no reading medium in the ninth grade since their local school districts have no access to VI certified teachers who could offer the services the child needs. There is a notable reliance on visual experiences in general testing. Either the scores should be separately standardized on a VI/blind population or the scores simply act as an individual measure of progress. Perhaps MSB/MSD student scores on state tests, (if</p>	<p>The proposed revision is to comply with state and federal laws that require accountability results and a grade classification for all schools. The grade assigned to MSB is considered “unofficial” for the 2018 accountability results.</p>

Summary of Administrative Procedures Act (APA) Comments

Summary of Comment	MDE Response
you must count them) should be sent to their home school districts as those of students at MSA and MSMS.”	

Katrina McDowell

From: MARGIE OWENS <tennis40w@comcast.net>
Sent: Sunday, August 26, 2018 7:58 AM
To: Accreditation
Subject: comments on the APA Process on district scores

As a former parent of a child who attended MS School for the Blind and a retired teacher from there, I have some definite concerns about assigning a grade to the school on the basis of state test scores. My reasons are:

1- many MSB students come to the school after failing in public schools and some even have had no reading medium in the ninth grade since their local school districts had no access to vi certified teachers who could offer the services the child needed. Even with accommodations this student is at a noted disadvantage when taking state tests.

2- in spite of the bias review committees, there is a notable reliance on visual experiences in general testing....there is really no way to avoid this realistically unless the test has been specifically developed with the visually impaired/blind student in mind. Think about math word problems (particularly in relation to geometry) and the need for an understanding of things that are basically visual in nature. I am not against them taking state tests, just that either the scores should be separately standardized on a vi/blind population or their scores simply act as an individual measure of progress.

3- Perhaps MSB/MSD student scores on state tests (if you must count them) should be sent to their home school districts as those of students at the MS School of the Arts and the MS School for Mathematics and Science are. That would, at least, seem more fair and consistent.

I appreciate the opportunity to comment on this possible new policy. My daughter received an excellent education at the MS School for the Blind and went on to graduate from Belmont University with honors. She learned to be independent and developed a sense of worth through the specialized training and opportunities (student council, cheerleading, track) at the school. I do have grave concerns at this time about the direction the school is moving and am very unhappy about the attitude of MDE that being highly qualified as a teacher of the visually impaired is no longer needed.

Margie Owens

Katrina McDowell

From: Alan Burrow
Sent: Friday, September 7, 2018 9:22 AM
To: Katrina McDowell, John C. Stovall
Subject: EW: APA Submission

C. Alan Burrow, *Director*
Office of District and School Performance
Division of Accountability

MISSISSIPPI DEPARTMENT OF EDUCATION
P.O. Box 771 | Jackson, MS | 39205-0771
Office 601.359.3514
Fax 601.359.2471
www.mdek12.org
Twitter: @MissDeptEd



**MISSISSIPPI
DEPARTMENT OF
EDUCATION**

Ensuring a bright future for every child

From: Lundy Brantley <lbrantley@neshobacentral.com>
Sent: Friday, August 24, 2018 9:28 AM
To: Alan Burrow <ABurrow@mdek12.org>
Subject: APA Submission

Allan,

I hope you are doing well! I greatly appreciate the MDE re-calibrating the high school scores. I believe it was done fairly and equitably for all districts. Please take this as my submission for APA.

--
Dr. Lundy Brantley
Superintendent
Neshoba County School District



Katrina McDowell

From: Chism, Chris <cchism@pearlk12.com>
Sent: Friday, August 24, 2018 1:45 PM
To: Accreditation
Subject: Adjustment

There is NO QUESTION that the cuts need to be updated. This has to be done. Period.

However, as an administrator, there are a few things I would like to address.

Is our goal to measure a STANDARD? I feel certain the answer will be “yes” to this question. If this is true, why are we measured on STATE PERFORMANCE of a standard? In other words, the better we do as a whole, we are then regressing to the mean with the standardization process. There is NO WAY the English II test was “easier” if the state went down 3 1/2 % in proficiency. Moving 4-7 points at each level cost many students with regard to passage and growth. This issue needs to be addressed moving forward. 1-2 raw score points is understandable. 4-7 tells me we have a validity problem with the test.

Next, we have a new science test this year. This WILL affect scores for next year. In the ivory tower, the difference in this 50 point test seems negligible. However, if you are a school on the cut line, a few points can be BIG. Will there be another adjustment?

Next, we are adding ELL into the model. For the record, the way this is being implemented and scored is beyond absurd. There are so many schools that won't meet the minimum n-count, and ELL won't matter to them. These schools won't get touched in the model. On the other hand, there are many schools that have many ELL students. This whole idea is beyond unfair to schools with ELL populations. Will the cuts then be reset again?

Our current system is an ever moving target. From standardization to cut scores, we never really have a goal to attain – until the testing is over. This process is beyond frustrating. Personally, I feel like the entire model needs to be rewritten from top to bottom. We need something that makes sense, and we need something that is fair to every school.

Chris Chism

Principal – Pearl High School

Katrina McDowell

From: Brian Jernigan <bjernigan@nettleton.k12.ms.us>
Sent: Tuesday, August 28, 2018 9:39 AM
To: Accreditation
Subject: Cut Score Reset for 1000 point schools

Given the over-inflation of growth with the bridge scale used with PARCC and MAAP, this is a necessary adjustment to accurately capture realistic performance.

With the current distribution, it isn't representative of what our students have accomplished for the 2017-2018 school year.

This is what is best for our state at this point.

Further, it is time for MDE establish a set cut score for all schools and districts so we can "know" the target. It is very frustrating for staff and students when we are working with a moving target.

Additionally, as long as we use a distribution of percentages, the state is ensuring there will always be D and F schools. This is a disservice to schools across the state.

--

Thank you!

B. Jernigan
Superintendent
Nettleton School District

www.nettletonschoools.com
662.963.2151

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

"The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution, or use of the contents of this message is strictly prohibited. If you received this electronic message in error please notify, me at the email address above."

Katrina McDowell

From: Penny Westfaul <pwestfaul@jcsd.k12.ms.us>
Sent: Tuesday, August 28, 2018 12:39 PM
To: Accreditation
Subject: High School Cut Points

To Whom It May Concern:

I am in favor of the proposed changes to the high school accountability model.

Please adjust the cut scores to correct the unrealistically high growth expectations currently in place.

Sincerely,

Penny Westfaul, Ed.D.

Curriculum Director

Jackson County School District

Sent from Mail for Windows 10

~~Katrina McDowell~~

~~From:~~ Alan Burrow
~~Sent:~~ Friday, September 7, 2018 9:21 AM
~~To:~~ Katrina McDowell, John Cartwright
~~Subject:~~ ~~EW: Proposed revision to cuts of schools with a 12th grade~~

APA...

C. Alan Burrow, *Director*
Office of District and School Performance
Division of Accountability

MISSISSIPPI DEPARTMENT OF EDUCATION
P.O. Box 771 | Jackson, MS | 39205-0771
Office 601.359.3514
Fax 601.359.2471
www.mdek12.org
Twitter: @MissDeptEd



MISSISSIPPI
DEPARTMENT OF
EDUCATION

Ensuring a bright future for every child

From: Tony Cook <tcook@houston.k12.ms.us>
Sent: Tuesday, August 28, 2018 2:18 PM
To: Alan Burrow <ABurrow@mdek12.org>
Subject: Proposed revision to cuts of schools with a 12th grade

When cut scores for 1,000 point schools were reset last year, it caused inflated growth numbers because of the correlation of scores between PARCC and MAAP assessments. These inflated growth numbers have adversely affected 1,000 point schools in the current accountability ratings. Since there is now a year to year comparison of MAAP to MAAP, last year's inflated growth numbers have disappeared and make current growth numbers appear lower than they should. The current numbers do not reflect the level of instruction, nor the true levels of growth, occurring in our classrooms. Therefore, I believe that this year's proposed revision of cut scores is needed.

Tony Cook
Houston School District

"Take care of the little things, and the big things take care of themselves."

"The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution, or use of the contents of this message is strictly prohibited. If you received this electronic message in error please notify, me at the email address above."

Katrina McDowell

From: Benigno, Chuck <cbenigno@wmcarey.edu>
Sent: Tuesday, August 28, 2018 9:29 PM
To: Accreditation
Subject: APA Comment - Business Rules for Reset of High School Baseline Scores

MDE Staff and State Board Members,

I applaud you for revisiting the 2018 baseline scores for schools with grades 12. The inflation that occurred to the 2017 baseline scores due to the high school having a PARCC to MAAP growth year certainly needed to be addressed. However, it is important to realize that the overall "school district" baseline scores were also impacted by the same legitimate concerns that you are addressing for the high schools.

I draw your attention to the 25 point increase (464 to 489) in the baseline score for districts to avoid being a "F" school district. In 2016, a district with a 463 or less was considered a "F" district. In 2017, the cut scores were recalculated which led to the bottom 14% of districts having a score of 488 or less to be a "F" district. Also, one cannot underestimate the impact of the English II cut score for proficiency moving from students needing 38 questions correct in 2017 to students in 2018 needing 45 questions correct to get the same proficiency. This means that the combination of lower than normal PARCC scores from 8th grade and an easier (38 questions correct) 2017 English II test caused many low-performing school districts to have an inflated score that is not comparable to 2018.

I know you have taken a great deal of heat for having to change the baseline cut scores for a third year in a row. I also know that you want to do what is right so that no school or school district is unfairly labeled a grade they do not deserve. If you will look at the changes to the school district cut scores from 2016 to 2017 (see below), you have to say that something is wrong when the score to be an "A" district was made 4 points easier (672 to 668) and the score to avoid being a "F" district became 25 points harder to avoid (463 to 488). Once a district or school is labeled a "F" it is difficult to escape that stigma. It is imperative that you evaluate whether the school district cut score is one that is fair and without a shadow of a doubt a true "F".

School District Baseline Changes from 2016 to 2017

A = 672 to 668 (4 points easier)

B = 588 to 599 (11 points harder)

C = 523 to 536 (13 points harder)

D = 464 to 489 (25 points harder)

F = 463 to 488 (25 points harder)

There is no question that the reason the score for the Bottom 14% of school districts rose to 488 in 2017 is partly due to the inflation that you have agreed happened to all high schools. It is only fair that this cut score also be evaluated. Thanks for considering! Chuck

Chuck Benigno, Ph.D.
Associate Professor
School of Education

William Carey University
710 William Carey Parkway

Hattiesburg, MS 39401
Cell: (601)-580-1810

Carey Strong – “God is our Refuge and Strength”

Psalms 46:1-2, 11

Katrina McDowell

From: Jon Delperdang <jondelperdang@gmail.com>
Sent: Wednesday, August 29, 2018 11:38 AM
To: Accreditation
Subject: Public comment on accountability cut scores

To Whom It May Concern,

I am writing to express my opinion as an educator with 12 years of experience in education on the possibility of an accountability cut score based on the percentage of schools. I will use a classroom example to illustrate the situation. Let's say last year I gave tests and quizzes and so an A was 93% and I was satisfied with my teaching delivery and the grade distribution. Then let's say this year there were a few goofball students who influenced other students to not try as hard. I taught the same lessons with the same tests and the students, based on previous performance in earlier grades, had the same ability as students from the prior year. It would be irresponsible for me, as an educator, to adjust the grades of students so a certain percentage have As, Bs, Cs, etc. because the performance of students this year was not as good as last year. If I changed the scale, then no one would be able to tell accurately how much a student learned in a given class.

I urge for MDE to set static grading standards rather than continually moving the target for districts, especially after the year being adjusted has already been completed. This ensures a clear expectation is set that educators can use as a guiding star for student achievement. Setting static grading standards also ensures a more accurate portrayal of academic achievement across Mississippi schools.

Thank you.

Jon Delperdang

Katrina McDowell

From: Carley Dear <carleydear@gmail.com>
Sent: Wednesday, August 29, 2018 12:13 PM
To: Accreditation
Subject: Accountability Ratings Comments

The accountability ratings are having to be reset in large part to school districts being able to manipulate accountability ratings with the acceleration component #9 in your framework. I do not think the scores need to be reset. I think the acceleration component needs to be reworked so the swings don't happen.

I feel that it is fair if a student receives a 3 or better on the AP exam. However, allowing dual credit students with a grade of C or higher as administered, in many cases, by the high school teacher working as an adjunct for the community college, does not carry the same weight as the AP or IB requirements. Some schools are now forcing students in vocational programs into dual credit programs even if they aren't sure they are ready to earn college credit or not. Other schools are potentially watering down the expected outcomes in order for students to get good grades.

If a school district can have over 1,000 students participating in dual credit and that raises the district from a B to A, then is that a reflection on the community college or the school? Or are other ratings being minimized?

It is my opinion that without the acceleration piece, the scores (graduation rate, growth, etc) would remain more stable and not require the major changes in the scores.

I do not like the percentile model as it suggests MS will always have failing schools. However, the bottom 14th percentile and lower schools may be in line with national benchmarks. I think schools should be scored not against other MS schools, but against a baseline number that aligns with national standards so districts know what they need to do for improvement... There are many A-level performing schools in MS.

I also don't agree with the large range for B schools and the expanded C school category.

This proposal needs to be examined more thoroughly.

~Carley Dear

Katrina McDowell

From: Christie Holly <cholly@tcsk12.com>
Sent: Wednesday, August 29, 2018 1:22 PM
To: Accreditation
Subject: Revision of Business Rules for 1000 point schools with grade 12

Good afternoon!

I am writing in support of the proposed change to the Mississippi Public School Accountability Standards, specifically the business rules as they relate to the resetting of baseline scores for schools with a 12th grade (1000 point schools).

As superintendent of Tishomingo County Special Municipal Separate School District, I support the proposed baseline resetting process for the 2017-2018 accountability results for the following reasons:

1. The 2016-2017 accountability results for 1000 point schools were based upon two different Algebra I tests - MAAP and PARCC. Due to the banking process involved with Algebra I, MDE was faced with trying to develop a leveling mechanism to compare growth for students between the two different assessments. This created a one-time growth inflation for 1000 point schools due to that process, thus setting the cuts for A-F rankings at a level only appropriate for that one year.
2. Due to the focus on student growth in Mississippi's accountability model, this growth inflation affected 20% of the components used in the model for 1000 point schools. However, the inflation was necessary in order to best compare students' growth across two distinctly different assessments (MAAP and PARCC).
3. In the 2017-2018 school year, MDE and schools were finally able to have valid growth comparisons on the state's assessments since PARCC scores were no longer involved in the banking process, and instead, MAAP to MAAP comparisons could be used for 10th grade students' Algebra I scores. Therefore, results from the 2017-2018 MAAP assessments were NOT inflated and do not currently reflect any needed leveling component.
4. Statewide data, as well as the data within my own district, show increases in proficiency and growth for students in Algebra I when compared to their 8th grade performance. However, if the cut scores from 2016-2017 are used, this does not accurately reflect that student performance increase. Instead, it would show a decline in student growth when actually student growth increased. In fact, data show that the state would have only produced 7 A-rated 1000 point schools. That is not representative of the data, and therefore, it is an inaccurate depiction of the hard work of students, faculty, administration, parents, and communities across our state. Therefore, I support the resetting of baseline scores in order to show the accurate growth of our students and schools.
5. Likewise, consideration should be given to the impact on district accountability scores in this process as well. Since close to 50% of the data from 1000 point schools determine district point totals, district cuts need to mirror that same data. The Technical Advisory Committee stated that minimal impact would occur within the district model. When observed, minimal change does occur in the A range. However, there is a 5-6 point difference in both the B and C ranges. A district that receives a D rating instead of a C rating, or a district that receives a C rating instead of a B rating due to these point differentials would not consider this impact to be "minimal" as referred to by the Technical Advisory Committee.

Our public looks at our schools' ratings and rankings seriously each year. It is my desire and prayer that ALL schools' data are accurate and reflect the fruit of the labor of our schools. Not only is the public eye on these ratings, but industry and business study these results when decisions are made regarding possible new jobs and new facility placements. Although these rankings don't and shouldn't define all aspects of a school's

worth, they are of immense importance because of the weight placed upon these results. Knowing this, I fully support the proposed change to existing cut scores for 1000 point schools in the current business rules in order to give an accurate depiction of learning in our state's public schools.

Thank you,

--
Christie Holly
Superintendent of Tishomingo County School District
(662) 423-3206

"Education is the most powerful weapon which you can use to change the world." ~ Nelson Mandela

Confidentiality Disclaimer:

The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution or use of the contents of this message is strictly prohibited. If you received this electronic message in error, please notify us immediately at 662-423-3206 or by email.

Katrina McDowell

From: Virgil Belue <vfbelue@gmail.com>
Sent: Wednesday, August 29, 2018 4:39 PM
To: Accreditation
Subject: ACCOUNTABILITY RATINGS FOR SCHOOL DISTRICTS

Dear Mr. Burrow:

Posted below are my comments concerning the never ending changes of the accountability ratings for the school districts.

It is my understanding that school districts' ratings are essentially determined by percentages that have been changed often so as to not have too many or fewer districts in the various A through F categories. In my opinion the teachers and administrators of the school districts are shooting at an unknown target, and they do not know how many "points" they need to make to move up to a higher category. As a results, the teachers, administrators, parents, and students are under a great deal of anxiety and stress.

Companies that develop standardized tests do so by testing the targeted population several times, and thereafter, cuts scores are made based on the data. The Mississippi State Department of Education has enough data to do the same. The raw data should be used to determine the various categories of A through F. The teachers and administrators would then know how many "points" they would have to make to improve enough to move up to a higher rating.

By using this method there would not be any set percentages to determine the ratings. The ratings would always be determined by the raw numbers that should not be changed until another cycle of testing is done to update the ratings. Under this plan it would be possible, but not practical, that there would be no school districts with a rating of F.

Legislators and State Department of Education personnel must understand that required curriculum changes invalidate the the tests that are currently in use. When new curricular changes are required, there should be separate tests administered for 3 or more years before these test results become a part of the ratings. The hold harmless methods that are presently used when new curricular changes are required are not based on valid data. Stability is a must in programs of teaching and testing.

In my opinion, many school district personnel have the attitude that they can keep doing the same each year because the SDE will take "care" of them by adjusting the ratings based on a percentage technique.

Virgil F. Belue, Ed.D.
Retired Superintendent of the Clinton Public District.

Katrina McDowell

From: Sara K Garrett <skgarrett@nasd.ms>
Sent: Wednesday, August 29, 2018 5:42 PM
To: Accreditation
Subject: Cut score adjustment

I would like to offer feedback about adjusting cut scores. Adjusting scores each year with a Bell curve restricts some schools from ever reaching the A level (because only so many schools are selected, no matter how much growth/learning has occurred). To say that a certain percentage of schools are going to be a failure next year, no matter what happens, sets a school up for disaster and futility. If we apply that same model to businesses, would we want that many businesses going bankrupt each year? Would we want that percentage of students failing each class every year? Would you fire a certain percentage of employees every year just because they are lower performing on a test? If they are still performing above necessary levels, how is that fair?

This is a waste of time, financial resources, taxpayer dollars, etc... Lower cut scores to 2016 ratings and be done with it. Reward growth and progress, and focus on other state education reform that has proven empirical data. You stay at the bottom by knowing you're at the bottom. You stay in the middle by focusing on the successful practices of others, and you ride to the top by looking within yourself and accessing your own full potential. Let the principals lead and the teachers teach, and the students will learn.

Thank you for your time!

-Sara K. Garrett

--

Sara K. Garrett
New Albany High School
English 10/ACT Prep

Katrina McDowell

From: Kim Clemons <kim_clemons1@yahoo.com>
Sent: Wednesday, August 29, 2018 8:15 PM
To: Accreditation
Subject: Change in cut scores

To whom it may concern:

It has come to my attention that once again MDE is considering changing the cut scores to increase the number of F's and decrease the number of A's on the high school tests, instead of showing the actual improvements achieved.

As a teacher who retired this year from the Mississippi Public Schools, may I say why this is not a good idea?

First, we are already feeling disrespected by the state legislature. No pay raise again?

Second, especially at the high school level, these tests are ridiculous to begin with, so to then change the scores again to not reflect the true improvements would be again disrespectful to the hard work put in by these teachers and students!

Finally, many teachers who are close to retirement would probably consider that the "straw that broke the camel's back". When you already have a dire teacher shortage, do you really want to be the reason for more to retire because of such a stupid decision?

Let the teachers teach!

Sincerely,

Kim Clemons
21650 Tucker Road
Long Beach, MS 39560

Sent from my iPhone

Katrina McDowell

From: Lula Moore <lulamooore@yahoo.com>
Sent: Friday, August 31, 2018 6:30 AM
To: Accreditation
Subject: Increasing Cut Scores/Changing School Accountability

I am an advocate for students' school success and a supporter of public schools in Mississippi. It not only concerns me, but my God-Spirit of Righteousness within me is grieved about MDE Education Board and Commisioners intent to change the cut scores and MS School Accountability System ratings by increasing cut scores and assigning "A to F" school ratings based on percentages not school performance. Students and teachers should be awarded for improvements, not punished because their school ratings improved.

Please know that God reminds us that "It is not about us". Many times those making decisions get submerged in themselves and forget who imaybe harmed by their "self" acts. We are in this earth to serve, righteously, for the benefit of others. When we help others to be successful, we become more successful. Will you please revisit, reconsider and modify your intent? Nothing goes unnoticed by my All Seeing, All Knowing God.

Thanks much.

Lula Moore, NBCT/M.Ed
President, PPSGLC, Inc.
Parents for Public Schools of Greenwood & Leflore County

Sent from Yahoo Mail for iPhone

Katrina McDowell

From: Weeks, Jimmy <jimmy.weeks@leecountyschools.us>
Sent: Friday, August 31, 2018 7:47 AM
To: Accreditation
Subject: Comments - Resetting baseline scores

Alan and Paula,

As you know, last year, cut scores in 1000 pt. schools were based on two different English tests and Algebra I tests. (PARCC and MAAP) Because of the necessary leveling formula applied to the two different sets of scores, growth scores were inflated and the accountability grades were assigned based on this. An inflation factor was present in 40% of the components applying to 1000 pt. schools. Since the 17-18 scores are compared to the previous year's MAAP test scores, growth score inflation hasn't occurred. Unless cut scores are reset, only seven 1000 pt. schools will be eligible to receive a letter grade of A. I just don't feel this is a true reflection of what is taking place in classrooms across the state. NAEP scores are rising. MAAP Math proficiency is rising. It seems to me grade level performance classifications would be representative of the actual data as well. I believe a resetting of these cut scores is the right thing to do and I am so pleased that MDE is working towards this. However, if 1000 pt. school cut scores change and with 50% of the data from those schools determining district point totals, shouldn't district cut scores change to mirror the changes in 1000 pt. school totals? Without resetting the cut scores for districts, I believe we won't have an accurate representation of all the great things happening in districts across Mississippi.

Thank you.

Jimmy Weeks

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

Confidentiality Disclaimer:

The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution or use of the contents of this message is strictly prohibited. If you received this electronic message in error, please notify us immediately at 662-841-9144.

Katrina McDowell

From: Billy Burnham <burnham@pasaints.com>
Sent: Friday, August 31, 2018 9:13 AM
To: Accreditation
Subject: Changing Baselines

I am opposed to it and I am disappointed in Dr Wright and the State BOE for allowing it once again. It does not throw a positive light on our state when we set expectations and lower them after the fact. It has been three or four years since a high school has received a true indicator of the progress or lack of in their school because of this moving backwards attitude. By the way I am a retired middle and high school principal.



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Katrina McDowell

From: Pitcock, Drew <dpitcock@wvsd.k12.ms.us>
Sent: Friday, August 31, 2018 12:36 PM
To: Accreditation
Subject: Public Comments

Good afternoon:

I believe it wise to adjust the cut scores, because growth last year obviously skewed the data; however, there can be no fair 1,000-point scale if we do not take into account all the unique 1,000-point school configurations. The data shows that 9-12 schools within the same district typically outscore the 3-8 schools in proficient/advanced and growth. This means that 1,000 -point schools that are not configured as 9-12 schools (k-12, 6-12, 7-12, 8-12) are at a distinct disadvantage when the scores are combined.

I understand that there may not be time to develop cut scores for each unique 1,000 configuration; however, the simple fix would be to assign letter grades based on 3-5, 6-8, and 9-12 scores. For example, an attendance center would have a letter grade based on 3-5, 6-8, and 9-12 data.

Respectfully,

--
Drew Pitcock, Ed.S.
Principal
Water Valley High School
550 Market Street
Water Valley, MS 38965

"The Greatness of a man is not in how much wealth he acquires, but in his integrity and his ability to affect those around him positively." ~Bob Marley

NOTICE OF CONFIDENTIALITY: This electronic mail transmission may contain confidential information, belonging to the sender, which is legally privileged. The information is intended only for the use of the individual or entity listed above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, use, or taking of any action on reliance of the contents of this electronically-mailed confidential information is strictly prohibited and may violate WVSD Board policy and the Family Education Rights and Privacy Act (FERPA). If you have received this electronic mail in error, please notify us by telephone immediately to arrange for return and correction of internal records; in addition, please delete the original message.

Katrina McDowell

From: Dr. Janice Page <jajohnson@gville.k12.ms.us>
Sent: Friday, August 31, 2018 9:42 AM
To: Accreditation
Subject: comment

I think that using the percentiles is a much better rule of measure versus changing the cut scores each year. I do understand that the accountability system cannot be rigid; however, there should be consistency and reliability. Hopefully, the percentiles will give us that consistency.

Janice Page, Ph.D.
Superintendent
Greenville Public School District

Safety+Supervision+Scores= Student Success

412 South Main Street/P.O. 1619
Greenville, MS 38702-1619
(o) 662-334-7001
(f) 662-334-3646
(e) jpagejohnson@gville.k12.ms.us

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 Greenville Public 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.*

Katrina McDowell

From: Todd English <tenglish@boonevilleschools.org>
Sent: Thursday, September 6, 2018 10:46 AM
To: Accreditation; Alan Burrow
Subject: Revision of Business Rules for 1000 point schools

I hope this email finds you well. Thank you for the opportunity to express my support of revising the business rules as it relates to the resetting of baseline scores for schools on the 1000 point scale. There are several factual reasons that I support the revisions:

1. The baseline scores set for the 2016-2017 results were artificially inflated because a leveling-mechanism had to be created to compare growth on two different tests in English 2 and Algebra I. This inflationary action was needed in order to account for the difference in rigor between PARCC and MAAP in the aforementioned subjects. The leveling-mechanism is not present this year because the growth comparisons are from MAAP to MAAP.
2. If the baseline scores remain, the students would be adversely affected. The proficiency level of our students in Mississippi are on the rise. Without a resetting of baseline scores for the 1000 point schools, our accountability scores would reflect the opposite. An improvement in the accountability scores should coincide with the improvement in proficiency. Since growth is 20-40% of the model, the inflated growth component of the 2016-2017 results simply cannot be ignored without adverse consequences.
3. I understand the state board's apprehension to changing the baseline scores for the 1000 point schools. Everyone would love a static model, but that is not the reality in 2018 and beyond. As opportunities change, does it not make sense that our model would do likewise?

I appreciate your efforts and consideration on this matter. Our motto in the Booneville School District is "Together We're Better". Together we will be successful.

Respectfully,

Todd English, Ed.D.

--
Superintendent
Booneville School District
201 N. First Street
Booneville, MS 38829

East Central High School

Jim Hughey, Principal
Ronald Rowell, Assistant Principal
5500 Hurley Wade Road/21700 Slider Rd.
Moss Point, Mississippi 39562
(228)588-7000

September 11, 2018

Mr. Alan Burrow, Director
Office of District and School Performance
Post Office Box 771
Jackson, MS 39205-0771

Mr. Burrow:

Over the past three years the state has used multiple testing companies to assess student achievement. Due to the inconsistency of measurement these examinations provided schools over these years, I am not confident state decision makers, in regard to test scores, have a clear picture of the accountability model. At East Central High School, we have never experienced any issues meeting growth with students until recently. It is my opinion, the current model is severely flawed because we are paying more attention to increasing student achievement not less. Our graduation rate, ACT performance and number of dual credit classes increased from 2016 – 2017 to 2017 – 2018 but our overall accountability score still fell substantially.

With this in mind, I am requesting the state lower cut scores for high schools, as well as, allowing schools earning 'A' status in 2016 – 2017 to keep the 'A' ranking for 2017 – 2018 until the state adopts an effective sustainable system.

Sincerely,



James Hughey, Principal
East Central High School

Katrina McDowell

From: Morgigno, Ray <rmorgigno@pearlk12.com>
Sent: Wednesday, September 12, 2018 8:37 AM
To: Accreditation
Subject: APA Comments on Accountability

We have a few concerns with the proposed changes to the accountability model. The first one is the high school cut scores. Before utilizing the bridge scale and inflated growth scores last year, the cut score was a 736 I believe. It was then changed to a 787 once the bridge scale/inflated growth scores were used. Everyone knew that the high school model would have to be changed again. The question is, why are we putting it above the 736 or so that was originally set as the top 10% when done with regular growth and no bridge scale. It seems as though the score should be put back to a 736 since that was the top 10% that it was originally set at. It almost appears that we are not being measured against a standard, but instead against one another. The other concern is that when we did the inflated growth model last year with high school growth, that not only changed the high school cut score, it increased the district cut score. The district cut score changed from a 666 to a 668. So, now that we are adjusting the high school scores back, it seems like we would adjust the district cut score as well since a high school's scores would impact the overall district scores. I do know that two points are not a whole lot, but again, are we are trying to see how we are doing against a standard, or one another? We have made tremendous strides across the state with district's sharing their best practices. If we start comparing ourselves against one another rather than how we did against a standard, we will be less likely to share best practices with other districts. That is my concern with constantly looking at the top 10%.

Another huge item that is lurking is the addition of the English as a Second Language portion on the accountability model. We were never shown any impact data prior to this being put into the accountability model. Now that we have the impact data, something has to change on multiple fronts with this. First, these students are already included in proficiency, growth for all, and lowest performing students growth rate. Thus they are being counted multiple times already and now we are adding an additional area for these students to affect a school and district's rating. Second is the issue of equity. This new ESL component drops our high school by 28 points, our junior high by 14 points, and our district by 15 points. This is a major impact. I have yet to speak to another district superintendent that has an ESL population that this is not having a similar effect on. Only around one half of the districts in Mississippi have an ESL population. This doesn't seem fair to have something that can potentially drop schools and districts by a whole letter grade when half of the districts in Mississippi are not impacted by this component of the accountability model. I understand ESSA has guidelines that say ESL is to be worked into the accountability model. However, it is our job to come up with a common sense, workable approach to how it goes into the accountability model. I ask that you please review the negative impact that this data will have on individual schools and districts across the state and revise the model to be fair and equitable for all.

Sincerely,

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

(601)847-8000 Office
(601)847-8001 Fax

Simpson County School District

111 Education Lane
Mendenhall, MS 39114

Superintendent
Greg Paes

September 12, 2018

Mr. Alan Burrow, Director
MDE Office of District and School Performance
P. O. Box 771
Jackson, MS 39205-0771

RE: Proposed changes in Accountability System for High Schools

Dear Mr. Burrow:

As Superintendent of Simpson County School District, it is my responsibility to ensure that all schools in our district are working diligently to improve student achievement every year but it becomes increasingly difficult when the cut scores are constantly being moved. Mendenhall High School experienced tremendous growth and academic progress moving from a "D" level to a "B" level. Those teachers, students, parents, administrative team and our entire community were so proud of that accomplishment and the school continues to work hard to maintain and exceed that level of success. Now, we are being told that MDE is asking the State Board to consider resetting the cut scores again this year for high schools. This resetting will have a negative impact on several schools. This is disheartening and quite frankly very disparaging.

Each time scores are reset, MDE uses the same percentile rankings to determine school and district ratings with a predetermined quota where 10 percent will receive As, 27 percent will receive Bs, 25 percent will receive Cs, 24 percent will receive Ds and 14 percent will receive Fs, regardless of how the students perform. This is wrong. If one of the goals for MDE is to ensure that all schools and districts are at least a C, how will this happen with this system involving percentages? If we are going to reset anything, it should be the entire accountability system we are using. How can schools' test scores show continued improvement yet the outcome depicts a lower rating? There is something wrong with the entire system when this happens. I believe we should spend this time revamping the entire system as opposed to continuing to reset the cut scores. Mendenhall High, our top performing high school, will regress under these proposed cut scores. It will go from a "B" level to a "D" level. That is a drop in 85 points for that school yet almost all indicators show positive growth points over the previous year. How is this possible? How do I explain this to the community, parents, students, teachers and administrators?

I am against the proposed changes in the accountability system for high schools. However, I am in support of developing an accountability system that is fair and does not change the cut scores after the test has been administered.

Sincerely,



Greg Paes
Superintendent

Achieving Excellence In Education

Katrina McDowell

From: Steven Hampton <steven.hampton@lamarcountyschools.org>
Sent: Thursday, September 13, 2018 9:50 AM
To: Accreditation
Subject: Reply to APA Notice: Revisions to the MS Statewide Accountability System

To whom it may concern,

I would like to take this opportunity to express the concerns I have with the proposed changes to 1.3 of the current Mississippi Public School Accountability Standards. In my opinion, by making this change in the Business Rules, MDE is formalizing a practice that has been in place since schools and districts have been receiving accountability ratings under the current accountability model. The practice I am referring to is the renorming or changing a school's or district's accountability rating from a specific score range to a range based on percentile rank. As a practicing educator, over the past few years I have noticed what I would classify as a cultural shift in how much and the type of information school's and district's share with one another.

When schools and districts were given a defined score they needed to have in order to achieve their desired accountability of A, B, C, D, or F schools and districts were focused on improving their school or district to reach the score that would get them to the next higher rating. During this time it was common practice for proactive educators like myself to reach out to other educators in hopes of networking or collaborating with other schools and districts to learn effective practices to improve student learning. Over the past year I have noticed a shift in my conversations with other educators. There has been a substantial decrease in the sharing of effective instructional practices and an increase in the conversations that compare assessment and accountability results and ranking. In my opinion, this shift has happened due to the environment in which the continued renorming of the accountability ranking based percentile rank has created. In this current environment it doesn't matter how high or low a school or district scores, it only matters that your school's or district's score is higher than 90%, 63%, 38%, or 14% of the other schools or districts. This has fostered a competitive environment where schools and districts feel it is no longer mutually beneficial to share instructional information or best practices with each other. Increasingly I have experienced situations where schools and districts are less willing to share information due to the fear they could be helping another school or district perform higher on their accountability score. This fear resonates from the possibility of helping another school or district could improve their accountability score and therefore their percentile rank which could result in your school's or district's percentile rank to be lower and therefore lower their accountability rating. There is even a possibility where a school or district could improve their accountability score but could see their accountability rating fall because other schools or districts improved their accountability score more. The fear of these possibilities has lead to an environment in which schools and districts are increasingly resistant to collaborate and share effective practices with one another.

Furthermore, if this proposal is passed by the State School Board of Education, I feel it would be appropriate to respectfully ask MDE's consideration in revising State Board of Education Goal number 6 which states "Every School and District Rated "C" or Higher". It is my position that continuing to rank schools and districts on this suggested percentile continuum will insure that fourteen percent of schools and districts will receive a ranking of F and 24 percent of schools and districts will receive a ranking of D. Therefore this change in the business rule would render goal 6 unattainable. I feel it is unfair to ask students, staff, faculty, and administrators in this state to strive to meet an unattainable goal.

Whether you realize it or not, and no matter if we like it or not, a school's or district's perceived effectiveness is solely based on the accountability rating that is assigned by MDE. It is my stance that by formalizing and continuing this practice of renorming accountability ratings based on percentile ranks will continue to perpetuate a unhealthy competitive environment in Mississippi's public education.

Respectfully,

Steven Hampton, PhD

Director of Accountability & Research



Confidentiality Notice: *This communication and any documents or files transmitted with it are confidential and are intended solely for the use of the Lamar County School District and the individual or entity to which it is addressed.*



**LAMAR COUNTY
SCHOOL DISTRICT**

empowering learners

P.O. Box 609
424 Martin Luther King Drive
Purvis, MS 39475
Phone: 601-794-1030 Fax: 601-794-1012
www.lamarcountyschools.org

September 13, 2018

To Whom It May Concern,

I would like to take this opportunity to express the concerns I have with the proposed changes to 1.3 of the current Mississippi Public School Accountability Standards. In my opinion, by making this change in the Business Rules, MDE is formalizing a practice that has been in place since schools and districts have been receiving accountability ratings under the current accountability model. The practice I am referring to is the renorming or changing a school's or district's accountability rating from a specific score range to a range based on percentile rank. As a practicing educator, over the past few years I have noticed what I would classify as a cultural shift in how much and the type of information school's and district's share with one another.

When schools and districts were given a defined score they needed to have in order to achieve their desired accountability of A, B, C, D, or F schools and districts were focused on improving their school or district to reach the score that would get them to the next higher rating. During this time it was common practice for proactive educators like myself to reach out to other educators in hopes of networking or collaborating with other schools and districts to learn effective practices to improve student learning. Over the past year I have noticed a shift in my conversations with other educators. There has been a substantial decrease in the sharing of effective instructional practices and an increase in the conversations that compare assessment and accountability results and ranking. In my opinion, this shift has happened due to the environment in which the continued renorming of the accountability ranking based percentile rank has created. In this current environment it doesn't matter how high or low a school or district scores, it only matters that your school's or district's score is higher than 90%, 63%, 38%, or 14% of the other schools or districts. This has fostered a competitive environment where schools and districts feel it is no longer mutually beneficial to share instructional information or best practices with each other. Increasingly I have experienced situations where schools and districts are less willing to share information due to the fear they could be helping another school or district perform higher on their accountability score. This fear resonates from the possibility of helping another school or district could improve their accountability score and therefore their percentile rank which could result in your school's or district's percentile rank to be lower and therefore lower their accountability rating. There is even a possibility where a school or district could improve their accountability score but could see their accountability rating fall because other schools or districts improved their accountability score more. The fear of these possibilities has lead to an environment in which schools and districts are increasingly resistant to collaborate and share effective practices with one another.

Furthermore, if this proposal is passed by the State School Board of Education, I feel it would be appropriate to respectfully ask MDE's consideration in revising State Board of Education Goal number 6 which states "Every School and District Rated "C" or Higher". It is my position that continuing to rank schools and districts on this suggested percentile continuum will insure that fourteen percent of schools and districts will receive a ranking of F and 24 percent of schools and districts will receive a ranking of D. Therefore this change in the business rule would render goal 6 unattainable. I feel it is unfair to ask students, staff, faculty, and administrators in this state to strive to meet an unattainable goal.

Whether you realize it or not, and no matter if we like it or not, a school's or district's perceived effectiveness is solely based on the accountability rating that is assigned by MDE. It is my stance that by formalizing and continuing this practice of renorming accountability ratings based on percentile ranks will continue to perpetuate a unhealthy competitive environment in Mississippi's public education.

Respectfully,

Tess R. Smith
LCSD, Superintendent

PARENTS' CAMPAIGN

Better Schools  Brighter Future

September 14, 2018

Mr. Alan Burrow, Director
Office of District and School Performance
Mississippi Department of Education
P.O. Box 771
Jackson, MS 39205-0771

Dear Mr. Burrow,

Please accept the following public comments regarding revisions in the business rules of the Mississippi Statewide Accountability System to reset the baseline scores for schools with Grade 12 effective for school year 2017-2018.

1. A seemingly entrenched pattern of resetting cut scores has compromised the validity of the accountability system in the minds of the public.

In 2016, the MDE and the State Board of Education publicly expressed an intent to use percentiles only to determine cut scores for the 2015-2016 year, after which the actual scores would remain in place as a measurable target toward which schools could aim. In 2017, that commitment was broken; baseline scores were reset and percentile rankings were re-imposed on schools and districts. Now, in 2018, schools with a 12th grade face a third year of forced percentile rankings, in which only 10 percent of schools will be allowed to receive an A rating and 14 percent will be required to receive an F rating.

Because the State Board of Education reset scores last year when it should not have done so, it now faces two bad options for schools with a 12th grade. Neither of those options offers an accurate reflection of what schools have accomplished.

Recommendation for 2017-2018 accountability ratings: Schools with a 12th grade should be evaluated on actual progress made over the last two years; MDE should determine a fair process for recognizing that progress.

2. Continuing to insist on the use of arbitrary percentile rankings – a practice that inflicts a failing rating on 14 percent of schools, regardless of how schools as a whole perform – is an illogical method of grading schools and districts that parents and educators alike find abhorrent. The Parents' Campaign has repeatedly called out the unfairness of percentile rankings, noting that the State Board's decision to ensure a smaller number of A-rated schools and districts (10 percent) than F-rated schools and districts (14 percent) is an unmistakable sign of an inherently unjust system. Furthermore, percentile rankings encourage competition, rather than collegiality, among schools. If only a limited number of

schools can be rated A, the motivation to work together to ensure that ALL schools rise to the highest level is eliminated.

The entrenched pattern of resetting scores, as mentioned above, means that this percentile ranking practice has been employed year after year. We believe the use of percentile rankings falls outside the bounds of ethical treatment of public schools and should be abolished.

Recommendation: Any time cut scores must be reset – this year or in the future – a fair and just system of determining baseline score targets for A-F ratings should be established.

The Parents' Campaign believes that public school children, their parents, and our state are best served by an accountability system that reflects high standards and that provides an accurate, not arbitrary, measure of the quality of education being provided in Mississippi schools.

Thank you for considering these comments.

Regards,



Nancy Loomer
Executive Director

Dear Mississippi Department of Education and Mississippi State Board of Education:

Districts have repeatedly faced changes to the accountability model. The current proposal is to update the model for schools with a grade 12 (1,000 point schools) for the 2017-2018 school year. Last year, the accountability model was changed to reset the cut scores for 1,000 point schools. The changes caused inflated growth scores for those schools due to the bridge scale. That inflation made growth numbers look abnormally high which caused the growth numbers from this year to look abnormally low. The growth this year is neither low, nor out of line with growth numbers from lower grades.

By resetting the cuts, the MDE is coming closer to reflecting what is occurring in high schools. With the current cuts, only 7 MS high schools would be classified as "A" schools which not reflective of what is happening in schools. Instruction has consistently improved as shown by increased NAEP scores, high school proficiency, graduation rate, acceleration, and college and career readiness performance. How, then, is it possible that letter grades would decline so dramatically? Therefore, I fully support that cut scores need to be revised to accurately reflect the performance in schools.

However, I have some concerns about setting new cut scores. The data from 1,000 point schools makes up a large portion of the district accountability model contributing directly to every number in the model. If the high school cut scores need to be reset, why then are district scores not being reset as well?

During the revision process, the task force agreed that 10% of Mississippi 1,000 point schools will be classified as an "A". Performance (letter grades) of districts is not being based on specified criteria. The criteria (cut scores) are being based on performance. This is mathematically backward. Originally, the district level educators on the Task Force asked that 15% of schools be classified as "A's" while MDE suggested 7%. At this point, maintaining that only 10% of 1,000 point schools are performing compete with other schools, rather than focusing on improving their own performance from year to year.

The accountability model has repeatedly changed after testing has occurred. Districts take testing seriously no matter the model. It is inherently unfair to move the target after the test is taken. Teachers morale is impacted since they went into the testing process with professional integrity. With the proposed changes, we are no closer to a concrete model with consistent targets which would provide teachers and districts with precise goals.

At the local level, we are expected to make and implement decisions after determining what the unintended consequences will be. MDE acts differently. MDE has decided to change the policy, but not as the issue was occurring. They changed the policy after tests were scored to make the model fit expectations. The changes benefit the same districts year after year. We ask teachers to teach and assess students with integrity and professionalism. Why, then, do we continue to treat the accountability model as flexible and malleable?

Respectfully,

Courtney Beard
Special Education Director
Pontotoc City School District
140 Education Drive
Pontotoc, MS 38863

Katrina McDowell

From: Darla Bryant <bryant_darla@yahoo.com>
Sent: Monday, September 17, 2018 6:44 AM
To: Accreditation

As a teacher when I give an assessment I do not predetermine the percentage of students who must make As and who must make Fs. Such a procedure undermines the integrity of my teaching and my expectations for my students. This is comparable to the expectations and preset outcomes the State Department has set for public schools. If scores are continually reset, the validity of said scores is jeopardized. If scores are being reset to accommodate certain schools and make their scores look better, that is egregious and incomprehensible. Consistency needs to be the goal for which we are reaching.

Sent from Yahoo Mail for iPhone

Katrina McDowell

From: Danielle Robinson <deerob0608@gmail.com>
Sent: Monday, September 17, 2018 7:14 AM
To: Accreditation
Subject: Cut Scores Reset

Dear Mr. Barrow,

As a constituent, educator, and parent for over a decade of the public education school system, I sincerely request that the high schools cut scores' formula that is to be voted on today be reconsidered. The current system is setting public schools up for failure and is neither just nor fair to the hard work and dedication that is conducted in an academic school year by administrators, faculty, staff, and our most important stakeholders, our Mississippi students.

We as Mississippians must be on an united front as it concerns the well being of over 95% of our students in the public education vector. Please listen to the concerns of your educators, parents, and community and restructure the model used to determine these test scores, in order that ALL students of our great state are successful.

Sincerely,

Danielle Robinson

Pearl River Central High School

7407 Highway 11
Carriere, Mississippi 39426
(601) 798-1986
FAX: (601)799-0068

DR. STACY BAUDOIN
Principal

KELLI BEECH
CTE Director

CRYSTAL PENTON
Assistant Principal

TARA WHITE
Assistant Principal

September 16, 2018

Mr. Alan Burrow
Office of District and School Performance
Mississippi Department of Education
P. O. Box 771
Jackson, MS 39205

Dear Mr. Burrow:

I am writing regarding the revisions to the business rules of the Mississippi Statewide Accountability System to reset the baseline scores for schools with Grade 12 effective for the school year 2017-2018.

I strongly believe that the validity of the accountability system in the eyes of the public has been compromised. The cut scores have been changed yearly for high schools for the past three years. As principal of a high school in Mississippi, I know first hand the difficulty of constantly trying to reach a moving target. Last year our school rating was an A. This year, we have made gains, but with the new cut scores, we have a B rating. When these scores are released to the public, our parents and community will incorrectly believe that we are not performing as well as the year before. My recommendation for the 2017-2018 accountability rating is for schools with a 12th grade to be evaluated on actual progress made over the past two years.

Sincerely,

Stacy Baudoin

Katrina McDowell

From: Janet Barefoot <jbarefoot@pontotoc.k12.ms.us>
Sent: Monday, September 17, 2018 8:08 AM
To: Accreditation
Subject: Accountability Standards

Dear Mississippi Department of Education and Mississippi State Board of Education:

The accountability model has repeatedly changed after testing has occurred. Districts take testing seriously no matter the model. It is inherently unfair to move the target after the test is taken. Teachers morale is impacted since they went into the testing process with professional integrity. With the proposed changes, we are no closer to a concrete model with consistent targets which would provide teachers and districts with precise goals.

At the local level, we are expected to make and implement decisions after determining what the unintended consequences will be. MDE acts differently. MDE has decided to change the policy, but not as the issue was occurring. They changed the policy after tests were scored to make the model fit expectations. The changes benefit the same districts year after year. We ask teachers to teach and assess students with integrity and professionalism. Why, then, do we continue to treat the accountability model as flexible and malleable?

Respectfully,

Janet Barefoot

Katrina McDowell

From: helen price <helen.price@lamark12.org>
Sent: Monday, September 17, 2018 8:52 AM
To: Accreditation
Subject: Public Comment on proposal to reset cut scores...

To whom it may concern,

I would like to take this opportunity to express the concerns I have with the proposed changes to 1.3 of the current Mississippi Public School Accountability Standards. In my opinion, by making this change in the Business Rules, MDE is formalizing a practice that has been in place since schools and districts have been receiving accountability ratings under the current accountability model. The practice I am referring to is the re-norming or changing a school's or district's accountability rating from a specific score range to a range based on percentile rank. As a practicing educator, over the past few years I have noticed what I would classify as a cultural shift in how much and the type of information school's and district's share with one another.

When schools and districts were given a defined score they needed to have in order to achieve their desired accountability of A, B, C, D, or F schools and districts were focused on improving their school or district to reach the score that would get them to the next higher rating. During this time it was common practice for proactive educators like myself to reach out to other educators in hopes of networking or collaborating with other schools and districts to learn effective practices to improve student learning. Over the past year I have noticed a shift in my conversations with other educators. There has been a substantial decrease in the sharing of effective instructional practices and an increase in the conversations that compare assessment and accountability results and ranking. In my opinion, this shift has happened due to the environment in which the continued re-norming of the accountability ranking based percentile rank has created. In this current environment it doesn't matter how high or low a school or district scores, it only matters that your school's or district's score is higher than 90%, 63%, 38%, or 14% of the other schools or districts. This has fostered a competitive environment where schools and districts feel it is no longer mutually beneficial to share instructional information or best practices with each other. Increasingly I have experienced situations where schools and districts are less willing to share information due to the fear they could be helping another school or district perform higher on their accountability score. This fear resonates from the possibility of helping another school or district could improve their accountability score and therefore their percentile rank which could result in your school's or district's percentile rank to be lower and therefore lower their accountability rating. There is even a possibility where a school or district could improve their accountability score but could see their accountability rating fall because other schools or districts improved their accountability score more. The fear of these possibilities has lead to an environment in which schools and districts are increasingly resistant to collaborate and share effective practices with one another.

Furthermore, if this proposal is passed by the State School Board of Education, I feel it would be appropriate to respectfully ask MDE's consideration in revising State Board of Education Goal number 6 which states "Every School and District Rated "C" or Higher". It is my position that continuing to rank schools and districts on this suggested percentile continuum will insure that fourteen percent of schools and districts will receive a ranking of F and 24 percent of schools and districts will receive a ranking of D. Therefore this change in the business rule would render goal 6 unattainable. I feel it is unfair to ask students, staff, faculty, and administrators in this state to strive to meet an unattainable goal.

Whether you realize it or not and no matter if we like it or not a school's or district's perceived effectiveness is solely based on the accountability rating that is assigned by MDE. It is my stance that by formalizing and continuing this practice of re-norming accountability ratings based on percentile ranks will continue to perpetuate a unhealthy competitive environment in Mississippi's public education.

Helen H. Price, Principal
Oak Grove High School
5198 Old Hwy 11, Hattiesburg, MS 39402
Website: oghs.lamarcountyschools.org
Facebook: Oak Grove High School, Hattiesburg, MS
Twitter: @OGHS1

Confidentiality Notice: *This communication and any documents or files transmitted with it are confidential and are intended solely for the use of the Lamar County School District and the individual or entity to which it is addressed.*

Katrina McDowell

From: Reba Greer <rbltr@maxxsouth.net>
Sent: Monday, September 17, 2018 8:54 AM
To: Accreditation
Subject: School Rankings

Having served on Standard development and score settings at a State and in a research setting, I am at a loss to understand the Mississippi situation.

What is actually the purpose and why the continuous changes?

Sent from my iPhone

Katrina McDowell

From: Dennis Penton <DPenton@npsd.k12.ms.us>
Sent: Monday, September 17, 2018 8:57 AM
To: Accreditation
Subject: Accreditation cut scores.

Mr. Burrows

I would like to take this opportunity to make comment on the current effort to adjust cut scores for the High Schools, Schools with a 12th grade. I am in favor in general of adjusting scores when necessary to offset statistical anomalies as well as adjust for things such as test changes that will occur over time as is the nature of the beast of Testing. I firmly believe that we must test in order to measure relative effectiveness of both districts and teachers/admin. I do not however prescribe to the idea that state test help us individualize assistance for students. I believe that that is better done by progress monitoring on a much more frequent schedule than annually.

All this being said I would like to make two suggestions that I am hopeful will make it to the powers that be.

1. We abandon the idea that we need to have a certain percentage of A's B's C's D's and F's in the state. We need to establish the criteria for these levels and allow every district that rises to the occasion to reach them regardless of what other districts do. Our current practice is the equivalent of telling a student that only x percent of you will get an "A" no matter how hard you work. Set the bar and provide support to reach it.
2. We need weighted growth. We all know that growth at the bottom is easier to achieve than at the top. The .25 is one aid but it does not account for the statistical fact that you can grow a level 1 easier than a level 4 or 5. We can run the data and determine the average growth for each level. We should then apply that data to a formula that would give proper credit for growth at all levels. Until we do this we will see the three year wave that comes from catching up with proficiency.

Thank you for all of your help and assistance

Dennis E. Penton

Katrina McDowell

From: Stacy Holifield <stacy.holifield@lamark12.org>
Sent: Monday, September 17, 2018 9:50 AM
To: Accreditation
Subject: Accountability Changes

Dear Mr. Burrow,

When percentile rankings are used to determine scores, the more students improve as a whole, the higher the cut scores are set, and the more difficult it becomes for schools and districts to receive a higher accountability grade. Now, I do support required growth. No school should remain stagnant.

Our accountability should allow top performing districts and schools to be recognized without limiting those who can receive an A rating. It is not fair to the public, parents, or schools that it is predetermined that 10 percent will receive As, 27 percent Bs, 25 percent Cs, 24 percent Ds, and 14 percent Fs, regardless of how students perform.

Can we celebrate our victories? our growth? our outstanding schools? Thank you for your consideration.

--
Stacy Holifield
Assistant Principal
Purvis High School
(601)794-6221 ext 3803

Confidentiality Notice: *This communication and any documents or files transmitted with it are confidential and are intended solely for the use of the Lamar County School District and the individual or entity to which it is addressed.*

1. This comment references the changes to the Business Rules in February. The changes were good and should have been approved. The changes increased the points districts and schools were able to get in several categories related to growth. This impacted the final numbers in growth for 2018. Each time a change is made there is a consequence.
2. Using percentile rankings implies that the test is norm-referenced. The state assessments supposedly are criterion-referenced assessments designed to measure a set of standards selected by the state. The goal is for students to master those standards at a proficient level.
 - a. Why would the state want to make a criterion referenced test norm referenced? Using it in this manner seems to cloud the issue of progress. The comparison is among Mississippi schools rather than the nation and rather than a bar of success.
 - b. If the goal is to have a norm-referenced assessment so that Mississippi students can be compared to other states, then perhaps it would be more practical to use a norm-referenced test that is designed for this purpose.
3. Changing the number of raw score points to reach proficiency implies there was an equating issue with the assessment. Even though multiple methods of equating were required by the TAC and they seemed satisfied, seven points seems excessive. Could it possibly be that teachers have been able to develop a clearer understanding of the standards and how they must be delivered to students to achieve proficiency. This is the purpose of using a criterion-referenced assessment.
 - a. Was it one particular standard that resulted in the equating problem or was it multiple standards?
 - b. How many questions were involved that created this issue?
 - c. How were the questions selected by Questar?
 - d. Did all the questions have an appropriate field test p value when selected?
4. Excessive changing each year makes it impossible to actually determine progress. It is clear that the state wants to maintain a percentage in each category as a primary concern rather than challenging districts and schools to reach a certain bar.
5. It is unfortunate that there have been 3 different tests and, in an effort, to equate those assessments for purposes of comparison, bridge scores were derived. This should have equated the assessments. However, additional manipulations based on percentile ranks further clouded the issue, creating additional confusion. MCT to PAARC in 2015, PAARC to MAP in 2016, MAP to MAAP in 2017 (this manipulation with percentile ranks created an impossible situation). The difference in the 2018 scores as compared with the 2016 scores shows a slight gain, which is reasonable. This indicates that the state is making slight progress but not the skewed progress indicated by the 2017 scores. If percentile ranks are used again this year, the same issue will be on-going. It is also clear that the issue is primarily in the high school where there are fewer scores.
6. The primary goal for students at the high school level is to pass the assessment for graduation. The primary goal for the district is proficiency and a conflict of interest has been created.
7. The issue of growth at the high school level from grade 8, almost always involves two schools. This occurs in other grade bands as well but will be a consistent problem in the high school because it occurs across multiple years. The test for comparison of students at the high school level will be from the 2016 assessment rather than 2017 where the greatest manipulation by the

state occurred. Other grades will be compared from 2017 to 2018, which attributes to the stability in those grades. Then the school comparison is adjusted from 2017 rather than 2016. Another way to cover up the fact that little progress is being made.

8. Resetting the cut scores will have to be continued and districts or schools will only have to determine percentage to maintain a desired level – they will not have to ensure that all students master the required material and the value of a criterion-referenced test will be lost.

Dear Mississippi Department of Education and Mississippi State Board of Education:

Districts have repeatedly faced changes to the accountability model. The current proposal is to update the model for schools with a grade 12 (1,000 point schools) for the 2017-2018 school year. Last year, the accountability model was changed to reset the cut scores for 1,000 point schools. The changes caused inflated growth scores for those schools due to the bridge scale. That inflation made growth numbers look abnormally high which caused the growth numbers from this year to look abnormally low. The growth this year is neither low, nor out of line with growth numbers from lower grades.

By resetting the cuts, the MDE is coming closer to reflecting what is occurring in high schools. With the current cuts, only 7 MS high schools would be classified as "A" schools which not reflective of what is happening in schools. Instruction has consistently improved as shown by increased NAEP scores, high school proficiency, graduation rate, acceleration, and college and career readiness performance. How, then, is it possible that letter grades would decline so dramatically? Therefore, I fully support that cut scores need to be revised to accurately reflect the performance in schools.

However, I have some concerns about setting new cut scores. The data from 1,000 point schools makes up a large portion of the district accountability model contributing directly to every number in the model. If the high school cut scores need to be reset, why then are district scores not being reset as well?

During the revision process, the task force agreed that 10% of Mississippi 1,000 point schools will be classified as an "A". Performance (letter grades) of districts is not being based on specified criteria. The criteria (cut scores) are being based on performance. This is mathematically backward. Originally, the district level educators on the Task Force asked that 15% of schools be classified as "A's" while MDE suggested 7%. At this point, maintaining that only 10% of 1,000 point schools are performing compete with other schools, rather than focusing on improving their own performance from year to year.

The accountability model has repeatedly changed after testing has occurred. Districts take testing seriously no matter the model. It is inherently unfair to move the target after the test is taken. Teachers morale is impacted since they went into the testing process with professional integrity. With the proposed changes, we are no closer to a concrete model with consistent targets which would provide teachers and districts with precise goals.

At the local level, we are expected to make and implement decisions after determining what the unintended consequences will be. MDE acts differently. MDE has decided to change the policy, but not as the issue was occurring. They changed the policy after tests were scored to make the model fit expectations. The changes benefit the same districts year after year. We ask teachers to teach and assess students with integrity and professionalism. Why, then, do we continue to treat the accountability model as flexible and malleable?

Respectfully,
Dr. Michelle A. Bivens, Superintendent
Pontotoc City School District

Katrina McDowell

From: Jaetta Prayer <jaetta.prayer@yahoo.com>
Sent: Monday, September 17, 2018 10:48 AM
To: Accreditation
Subject: Proposal to Reset High School Cut Scores

Mr. Alan Burrow, I Jaetta Prayer, was made aware of this proposal on today. As a parent of a 6th grader and 7th grader I am against this proposal. I realize that the kids did an exceptional job last year but maybe you are not aware of everything they went through to get those scores. Our kids came home to us stressed out & worrying that even though they passed the class would they get held back because of a mandated test. We were the ones wiping tears when the kids realized they would repeat a grade or not graduate with there class because they failed a test by 3 points. Our children have more on there plates than you or I ever had in school. Let them be. That is why I am against this proposal. Thank you for your time and consideration.

Katrina McDowell

From: Kay Brocato <brocatokay@gmail.com>
Sent: Monday, September 17, 2018 11:09 AM
To: Accreditation
Subject: Public Comments on Resetting of Cut Scores

Hello Mr. Burrows &/or others in receipt of this note:

While the resetting of score baselines for standardized tests is a legitimate clinical, normative research practice, the resetting is counterproductive and even unethical when used statewide year after year as . . .

- 1) a public relations practice for support to MS LEAs,
 - 2) a technique to improve teaching and learning, and
 - 3) a mechanism for growing up healthy children,
- all of which our assessment systems is designed to do.

Please note that this resetting is blatantly in violation of our primary role as education professionals. Resetting scores is certainly the exact, right way we practice statistical analysis in an experiment where the research conditions are held to even minimal standards of to stop intervening variables in order to ensure just the basic amount of research validity and research reliability. Our assessment settings (MS classrooms) in the state of Mississippi have not undergone *any* of even the minimal checks and balances which would allow for acceptable level of controls to variables in the setting. Baseline changes are not a good response to the lack of sound research and assessment design.

Would you please let our leaders know that we are using data in a highly damaging way which violates the most basic requirements of validity and reliability in a data collection environment in Mississippi if we continue to do this kind of data analysis.

Thanks for all you do,
Kay B.

FORREST COUNTY SCHOOL DISTRICT



EMBRACE • INSPIRE • CHALLENGE • GROW

BRIAN FREEMAN
Superintendent of Education
400 Forrest Street
Hattiesburg, MS 39401
Phone 601-545-6055 Fax 601-545-6054

September 12, 2018

Mr. Alan Burrow
Office of District and School Performance
Mississippi Department of Education
P.O. Box 771
Jackson, MS 39205

Dear Mr. Burrow,

Please accept the submission of this letter to serve as my support of the change in cut scores for schools with a grade 12, only because no school is negatively impacted. I do adamantly disagree with the use of arbitrary percentiles in determining the cut points.

Numerous times district and school administrators were told that percentiles would only be used to establish the baseline for cut scores. After the initial implementation, the use of percentiles would no longer be used. While I understand the argument of “we must use percentiles because it’s in the business rules,” the committee could suggest that the State Board amend the business rules. The continued use of percentile rankings, while not intentional, creates an environment of animosity among school leaders and communities. We should support and encourage all schools to perform at its highest level. I can’t even begin to express the frustrations of our teachers in regards to using percentiles.

There are several other areas of concern, but I do not think this is the forum to express those at this time.

Mr. Burrow, it is imperative that we have an accountability system that is fair statewide. A school’s location, economic status, or grade span should not have an impact on its accountability rating. I strongly recommend a complete independent review of our accountability system in regards to fairness statewide.

Thank you for your consideration and sharing this with Dr. Wright and the Mississippi State Board of Education.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Freeman', written in a cursive style.

Brian Freeman, Superintendent



Farrest 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

Stephen May
CFO

September 14, 2018

Mr. Alan Burrow
Office of District and School Performance
Mississippi Department of Education
P.O. Box 771
Jackson, MS 39205

Dear Mr. Burrow:

I am writing this letter to provide support for moving the cut points for schools on a 1000 point scale for the 2018 accountability ratings. While I am supporting the change at this time, I would like for the State Board of Education to consider taking an opportunity to address the model itself which seems to be causing these constant changes rather than continuing to address a new symptom of the model each year.

Over the past several years, public schools have received a black eye in the arena of public opinion. Trust is a huge issue for us with our public. Once again, we are changing the scorecard for public schools in our state so trust is in question with our public. We have a model which is very volatile rather than consistent that has resulted in changes in the past two years due to the business rules of the model. While viewing the last Commission on School Accreditation meeting as well as the SBE meeting, I heard presentations using the lack of consistent test data as one of the reasons we are still having to make these adjustments. So I would ask, did the bridge not take care of these issues? We know that next year we will face this again due to changes in the tests whether the changes will be made to the 700 or 1000 point schools. And I would ask you who has to explain this to the public?

One issue with the model is how we calculate graduation rate. We had one of the most accurate graduation rate calculations in the nation - apportionment. When Mississippi sent in the draft ESSA plan, we, districts, were told that MDE did not ask if the previous calculation (even though it was accepted each year) could be used. Instead we changed even though the Accountability Task Force's recommendation was to stay with apportionment.

The College and Career Readiness Indicator is defined in the business rules as the ACT. The ACT is a college readiness test with national benchmarks set for college readiness. Where is the career readiness in this? Moving forward, I would support the ACT and ACT Work Keys for the high school rather than the four subject area tests. I have always been a strong supporter the other way, but at this point in time, we need to focus on what is best for our students. The four subject area tests only have meaning in our state accountability model and in the plan submitted to the USDOE for ESSA. Our students do not feel the importance of this test since they now have other routes of meeting graduation requirements. Therefore,

the urgency of the test(s) no longer exists for students. The ACT and ACT Work Keys truly do mean something for a student's future whether it is an entry for college or credentialing for the workforce.

While most of us understand that there is no perfect accountability model, I would ask that you consider whether or not the current model is the best and most consistent for the work of our schools. Our students deserve a model which focuses on their futures.

Thank you for your time and consideration.

Sincerely,

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

Donna H. Boone, Ph.D.
Superintendent



Post Office Box 1359 • Brandon, MS 39043 • p 601.825.5590 • f 601.825.2618 • www.rcsd.ms

Given that the percentiles were established on data that did not include MAAP-to-MAAP comparisons, it would seem appropriate to revisit the Performance Classification Descriptors (Appendices A and B of the attached document) established by the initial Task Force to ensure that the cut points and percentiles adequately reflect the intended descriptors for school performance. **To reapply percentiles from 2016 and prior to accountability results in 2018 eliminates recognition of progress made by some schools and essentially re-normalizes the distribution to a percentile scale that may no longer be applicable.**

The charts below further illustrate this concept. For each chart, school names are suppressed and 2017 statewide median and top quartile data are used for comparisons; however, the chart data for each site reflects 2018 Final Accountability Results. The data in Chart B support that the Elementary and Middle School results mirror the original Performance Classification Descriptors, while the results for High School results in Chart A do not. Specifically, our top two performing high schools received a “B” rating while meeting and exceeding all the descriptors for an “A” rated school.

Chart A: 2018 High School Results (compared to 2017 State Median/Quartile)

PERFORMANCE CLASSIFICATION DESCRIPTORS	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50
2017 STATE MEDIAN	41.5	34.5	54.2	60	72.7	72.7	80.8	86.9	84.2	32.6	55.3	644
2017 TOP QUART	54.3	48	65.5	72.1	86.1	85	91.9	97.7	88.4	47.3	61.9	722

School Name	Reading Proficiency	Math Proficiency	US History Proficiency	Science Proficiency	Reading Growth All	Math Growth All	Reading Growth Low	Math Growth Low	Graduation Rate	CCR Rate	Acceleration Rate	Total Points	Grade wo EL
	64	54.4	79.9	84	75.8	81.3	61	91.2	89.6	53.9	72.5	752	B
	60.4	60.1	81.2	72.9	74.9	82.2	57.1	81.5	90.3	65	69.2	741	B
	55.6	41.8	52.7	72.7	76.3	57.1	71.7	59.9	89.8	50	72.7	666	B
	34.6	40.1	76.5	63.7	54.9	61.9	52.1	51.3	86.6	48.4	79.6	602	C
	37	42.1	60.7	58.6	50.3	57	44.1	49	93.3	30.4	66.5	575	D
	38.6	40.5	58	65.5	48.6	55.8	38.4	47.2	92.3	44.2	61.7	568	D
	42.1	25.6	58.2	59.5	58.6	41.4	59.1	40.6	87	38.8	83	551	D
	38.9	29.6	52	65.4	58.6	40.9	60.3	33.1	83.5	46.4	69	545	D

Chart B: 2018 Elementary and Middle School Results (compared to 2017 State Median/Quartile)

PERFORMANCE CLASSIFICATION DESCRIPTORS	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50	A>TQ: B/C<=50
MEDIAN	32	35	63	55	57	57	350
TOP QUART	44	50	74	61	68	64	404

School Name	Reading Proficiency	Math Proficiency	Science Proficiency	Reading Growth All	Math Growth All	Reading Growth Low	Math Growth Low	Total Points	Grade wo EL
	72.3	84.1	55.1	78.9	95	65.1	76.7	567	A
	63.7	69.9	89.9	79.8	87.8	79.1	69.7	540	A
	64	69.2	94.7	75.6	80.3	75.8	60.9	521	A
	69.6	75		78.5	83.4	71.9	60.8	512	A
	61.5	69.8		81.6	83.6	77.6	59.5	506	A
	62.3	55.6	75	82.5	78.3	75.7	74.2	504	A
	55.7	64.8		79.2	85.1	75.6	61.9	493	A
	56.4	61.3	77.2	78.1	77.6	80.8	61	492	A
	55.6	72.2	86.2	70	87.8	54.4	64.2	490	A
	50.7	58.5	68.9	64.3	84.7	56.3	74.4	458	A
	46.9	36.9		64	88.8	63.4	81.3	445	A
	43.5	37.9	75.3	68.6	72.6	68.5	77.9	444	A
	52.4	56.2	70	69.5	68.7	69.8	57.7	444	A
	51.4	66.8	77.1	61	79.2	51.4	56.2	443	A
	47.6	49.2	81.6	73.1	62.7	75	52.5	442	A
	46.1	50.8	67.3	68.4	76.7	65.7	62.8	438	B
	48	67.6	76.5	56.7	79.8	49.6	54.3	433	B
	56.6	48.1	82.1	66.1	65.4	60.6	51.8	431	B
	35.8	38	72.2	70.2	65.9	71.1	59.7	413	B

Dr. Sue Townsend
Superintendent of Education



Post Office Box 1359 • Brandon, MS 39043 • p 601.825.5590 • f 601.825.2618 • www.rcsd.ms

2. We respectfully request that the State Board of Education re-evaluate the application of rule 15.2 with the 2018 Accountability results. Business rule 15.2.2 states: *The performance measure [for English learners] will be equal to 5% of total available points in the accountability system. All other components will be reduced by a total of 5% cumulatively when the EL performance measure is included.* The preliminary results shared with districts used a slightly different method, and this new calculation is **punitive** to every school with an average score below 0.90. As illustrated by the schools in our district in the table below, this punitive calculation creates an unintended consequence within the model, sending the message that EL students can only increase the school's accountability if they meet 90% of their goals. Using the method as outlined in rule 15.2.2, however, four of the schools in our district have a slight increase in score, even while not attaining the 0.90 average. While this component does not directly impact Accountability 2018, the values are being publicly reported. Therefore, the decision to follow this procedure should be reviewed and addressed through the Administrative Procedures Act before publishing EL Component results for 2018.

Final Results	EL Average	As Computed with ACCT18				As Originally Proposed			Score Difference
		PROJECTED	38.5/55 * AVER	DIFF	PTS WITH EL	PROJECTED (@95% BLOCK)	35/50 * AVER	SUM	
School A	0.70	413	27.0	8.1	405	392.4	24.5	417	-11.9
School B	0.53	438	20.4	14.6	423	416.1	18.6	435	-11.7
School C	0.90	445	35.0	0.0	445	422.8	35.0	458	-12.8
School D	0.69	444	26.6	8.4	439	421.8	24.2	446	-6.9
School E	0.77	493	29.6	5.4	491	468.4	27.0	495	-4.3
School F	0.72	540	27.7	7.3	533	513.0	25.2	538	-5.2
High School A	0.41	545	22.6	27.5	519	517.8	20.5	538	-19.3
High School B	0.67	690	36.9	13.2	679	655.5	33.5	689	-10.0
High School C	0.65	741	35.8	14.3	727	704.0	32.5	736	-9.4

Thank you for seeking input on the proposed revisions. Your time and attention to this matter is greatly appreciated.

Sincerely,

Sue Townsend, Ph.D.
 Superintendent of Education
 Rankin County School District

Attachment: Performance Classification Standards: Method for School Accountability (August 2013)

Dr. Sue Townsend
 Superintendent of Education



Post Office Box 1359 • Brandon, MS 39043 • p 601.825.5590 • f 601.825.2618 • www.rcsd.ms

Appendix A: Performance Classification Descriptors

Table 1A. Elementary/Middle Schools

Rating	Descriptor	Characteristic
A	Reading, Mathematics, and Science proficiency rates are in the top quartile of performance. Reading and Mathematics growth in the all students group is above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading and Mathematics growth component.	Highest Status Highest Growth Subgroup Growth
B	Reading, Mathematics, and Science proficiency rates are above the state median for the given year. Reading or Mathematics growth in the all students group is above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading and Mathematics growth component.	High Status Typical Growth Subgroup Growth
C	Reading, Mathematics, or Science proficiency rates are above the state median for the given year; however, no rate is in the lowest quartile. Reading and Mathematics growth in the all students group is above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading or Mathematics growth component.	Typical Status Typical Growth Subgroup Growth
D	Reading, Mathematics, and Science proficiency rates are below the state median for the given year. Reading or Mathematics growth in the all students group is below the state median for the given year. The lowest 25% subgroup did not earn at least 50 points in the Reading or Mathematics growth component.	Low Status Low Growth Low Subgroup Growth
F	Reading, Mathematics, and Science proficiency rates are in the first quartile for the given year. Reading and Mathematics growth in the all students group is below the state median for the given year. The lowest 25% subgroup did not earn at least 50 points in the Reading or Mathematics growth component.	Lowest Status Low Growth Low Subgroup Growth

Source: “Performance Classification Standards: Method for School Accountability” (August 2013)



Appendix A: Performance Classification Descriptors (cont.)

Table 2A. High Schools

Rating	Descriptor	Characteristic
A	Reading, Mathematics, and Science proficiency rates are in the top quartile of performance. Reading and Mathematics growth in the all students group is above the state median for the given year. A majority of the History proficiency, graduation rates, and college & career readiness indicators are above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading and Mathematics growth component.	Highest Status Highest Growth Subgroup Growth
B	Reading, Mathematics, and Science proficiency rates are above the state median for the given year. At least four of the five additional performance indicators (Reading growth, Mathematics growth, History proficiency, graduation rates, and college & career readiness in the all students group) are above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading and Mathematics growth component.	High Status Typical Growth Subgroup Growth
C	Reading, Mathematics, or Science proficiency rates are above the state median for the given year; however, no rate is in the lowest quartile. At least three of the five additional performance indicators (Reading growth, Mathematics growth, History proficiency, graduation rates, and college & career readiness in the all students group) are above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading or Mathematics growth component.	Typical Status Typical Growth Subgroup Growth
D	Reading, Mathematics, and Science proficiency rates are below the state median for the given year. Reading or Mathematics growth in the all students group is below the state median for the given year. At least two of the three additional performance indicators (History proficiency, graduation rates, and college & career readiness in the all students group) are below the state median for the given year. The lowest 25% subgroup did not earn at least 50 points in the Reading or Mathematics growth component.	Low Status Low Growth Low Subgroup Growth
F	Reading, Mathematics, and Science proficiency rates are in the first quartile for the given year. Reading or Mathematics growth in the all students group is not above the first quartile for the given year. The three additional performance indicators (History proficiency, graduation rates, and college & career readiness in the all students group) are below the state median for the given year. The lowest 25% subgroup did not earn at least 50 points in the Reading or Mathematics growth component.	Lowest Status Lowest Growth Low Subgroup Growth

Source: "Performance Classification Standards; Method for School Accountability" (August 2013)

Mississippi Department of Education

Performance
Classification
Standards: Method
for School
Accountability

The RIA Group
8/13/2013

Mississippi Department of Education Establishing Performance Classification Standards

Context

The Mississippi Department of Education, in accordance with the State Board of Education's policy, has developed a new school accountability model for use in meeting both state (Senate Bill 2396) and federal (34 C.F.R. 200) requirements. In April 2013, a set of recommendations created by the Accountability Task Force was presented to the State Board of Education. These recommendations contained a new performance classification system that would assign letter-based ratings (i.e., A, B, C, D, and F). These ratings would be based upon a composite score derived from several performance indicators. These indicators would aggregate data using the following metrics:

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

1. Reading Proficiency
2. Reading Growth - All Students
3. Reading Growth - Lowest 25%
4. Mathematics Proficiency
5. Mathematics Growth - All Students
6. Mathematics Growth - Lowest 25%
7. Science Proficiency

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

1. Reading Proficiency
2. Reading Growth - All Students
3. Reading Growth - Lowest 25%
4. Mathematics Proficiency
5. Mathematics Growth - All Students
6. Mathematics Growth - Lowest 25%
7. Science Proficiency
8. U.S. History Proficiency
9. Graduation Rate [Four (4) Year] - All Students
10. College & Career Readiness (Mathematics 50% and English/Reading 50%)

Although the aforementioned performance indicators were clearly delineated by the Commission, the composite score representing each level (i.e., “cut scores”) of performance enumerated by the A-F rating requires both impact data and a qualitative process to establish the necessary classification standards.

Method

The Mississippi Department of Education proposes to establish performance standards based upon identified “cut scores” that delineate five (5) performance levels. These performance levels will create the classification scheme necessary to assign a school rating for a given year. The established “cut scores” and applicable performance classification descriptors will be based on the overall composite score derived from several, unweighted indicators (dependent on school type).

Similar to traditional academic achievement standards (AAS) used in Mississippi’s statewide assessments, the proposed classification standards would describe a performance continuum using criterion-based terminology. These declarative statements would articulate the characteristics of school performance at each of the five levels; however, because of the compensatory nature of the accountability system, schools having the identical composite score within a particular performance category could demonstrate different values at the indicator level.

Using the performance classification descriptors to “calibrate” the panelist is the first process step prior to the review of data. In other words, the panelist will bring his or her individual interpretation of what the typical “A” school’s performance should be in order to have “face validity” with the both educators and the general public. Once a shared understanding of the performance classification descriptors is established by the panelists, making decisions on where to place the minimum composite score for each classification level will be more consistent among the panelists.

School-based classification standards will delineate a performance continuum based upon the combination of seven (7) or ten (10) indicators. The data from each indicator will be transposed onto a 100 point scale, which in turn will be combined (in a compensatory nature) to create a single, composite score. For elementary schools, the maximum score is 700, while for schools with a grade 12 (i.e., high schools), the range is increased to 1000 points. All indicators will be given the same weight when combined into overall composite score. The overall composite scores

are the values used to delineate (“cut”) each level. Once these “cut scores” are established, the Mississippi State Board of Education’s policy requires schools be assigned one of five letter classifications (i.e., A-F) that will reflect the classification standards.

In order to meet this classification requirement, the MDE will conduct a technical workshop comprising panelists from the Accountability Task Force. The Accountability Task Force will review the draft performance level descriptors, evaluate the initial “cut scores” values, examine indicator data, and refine draft material for consideration by the State Board of Education. Panelists will apply an “analytical reasoning” approach (Cizek & Bunch, 2007) that combines criterion-based descriptors and normative impact data in deciding the minimum score for each classification standard.

Data and Assumptions

The impact data was provided by National Strategic Planning and Analysis Research Center (nSPARC) at Mississippi State University. Drs. Parisi and Taquino used data provided from several sources to attribute data to each school in the sample (n=885), which closely approximates the population of schools in Mississippi.

A series of validity checks (see Beaudoin et al., 2006) were conducted to determine the quality of the data. The results suggest that 100% of the schools had an overall composite score; however, schools had the following anomalies:

- Missing ACT scores (15 schools)
- No graduation rate but contained both ACT and History Scores (1 school)
- Missing History test data (5 schools)

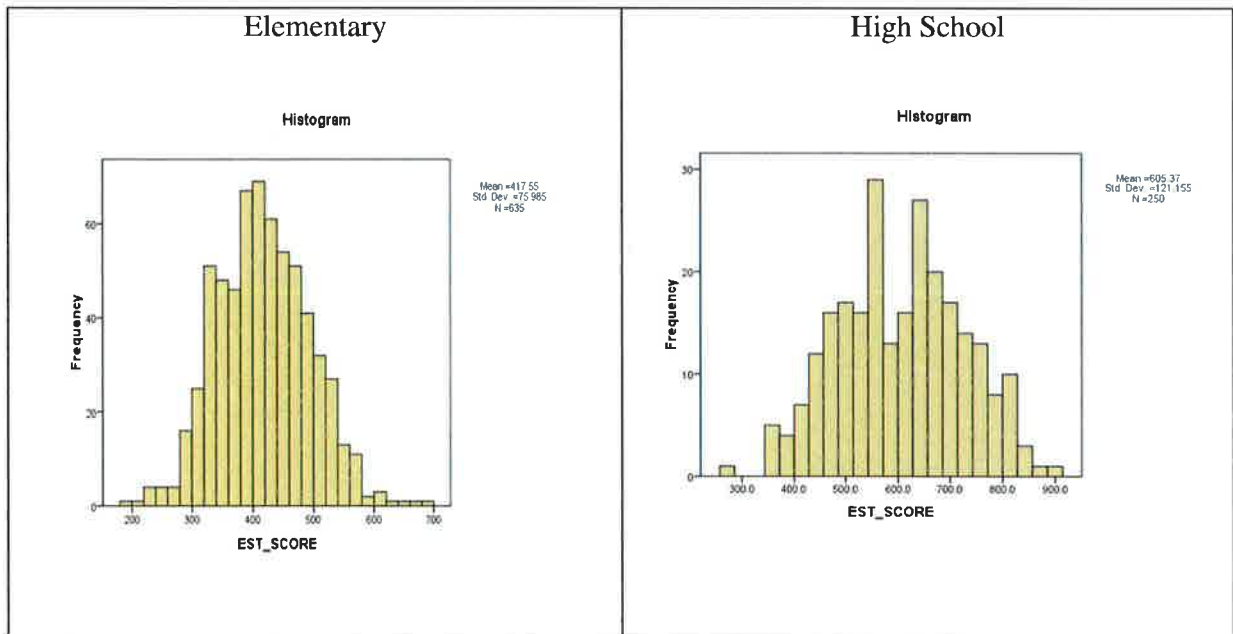
The above anomalies appeared randomly distributed among the preliminary classification scheme; yet, all missing data were attributed to high schools. Further, anecdotal information regarding the “match rates” of ACT data to schools will require panelists to interpret these data with caution.

The performance indicators were based upon SY 2011-12 results. Student-level data were handled by nSPARC once migrated from the MDE, thus the following assumptions are germane to the panelists:

- Student scores were attributed (linked) to the correct school.
- Business rules used to manipulate accountability data were applied with fidelity, including the application of the full academic year (FAY) criteria.

- For growth calculations, student scores were correctly linked across years.
- Graduation rates were calculated following the 34 C.F.R. 200.19 requirements and include only students earning a regular, high school diploma.

The data file was manipulated, and then a series of descriptive statistics were applied to determine the shape of the distribution. Once explored, the data file was separated into two distinct files based upon the number of indicators (elementary vs. high school). The median score for both distributions was used to establish the initial “cut score” separating “C” and “D” scores. The extreme scores in the 90th and 10th percentile were used to initially delineate “A” and “F” classifications. The final level, “B” was the midpoint between the “A” score and the median score. Once these values were assigned, the numeric values were changed to “smooth” the data, thus better reflecting the overall distributions’ shape (see figures below).



Appendix A: Performance Classification Descriptors

Table 1A. Elementary/Middle Schools

Rating	Descriptor	Characteristic
A	Reading, Mathematics, and Science proficiency rates are in the top quartile of performance. Reading and Mathematics growth in the all students group is above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading and Mathematics growth component.	Highest Status Highest Growth Subgroup Growth
B	Reading, Mathematics, and Science proficiency rates are above the state median for the given year. Reading or Mathematics growth in the all students group is above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading and Mathematics growth component.	High Status Typical Growth Subgroup Growth
C	Reading, Mathematics, or Science proficiency rates are above the state median for the given year; however, no rate is in the lowest quartile. Reading and Mathematics growth in the all students group is above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading or Mathematics growth component.	Typical Status Typical Growth Subgroup Growth
D	Reading, Mathematics, and Science proficiency rates are below the state median for the given year. Reading or Mathematics growth in the all students group is below the state median for the given year. The lowest 25% subgroup did not earn at least 50 points in the Reading or Mathematics growth component.	Low Status Low Growth Low Subgroup Growth
F	Reading, Mathematics, and Science proficiency rates are in the first quartile for the given year. Reading and Mathematics growth in the all students group is below the state median for the given year. The lowest 25% subgroup did not earn at least 50 points in the Reading or Mathematics growth component.	Lowest Status Low Growth Low Subgroup Growth

	Reading Proficiency	Math Proficiency	Science Proficiency	Reading Growth	Reading Low Growth	Math Growth	Math Low Growth
State Median	54.9	63.1	54.3	65.2	56.0	69.2	55.6

Appendix A: Performance Classification Descriptors (cont.)

Table 2A. High Schools

Rating	Descriptor	Characteristic
A	Reading, Mathematics, and Science proficiency rates are in the top quartile of performance. Reading and Mathematics growth in the all students group is above the state median for the given year. A majority of the History proficiency, graduation rates, and college & career readiness indicators are above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading and Mathematics growth component.	Highest Status Highest Growth Subgroup Growth
B	Reading, Mathematics, and Science proficiency rates are above the state median for the given year. At least four of the five additional performance indicators (Reading growth, Mathematics growth, History proficiency, graduation rates, and college & career readiness in the all students group) are above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading and Mathematics growth component.	High Status Typical Growth Subgroup Growth
C	Reading, Mathematics, or Science proficiency rates are above the state median for the given year; however, no rate is in the lowest quartile. At least three of the five additional performance indicators (Reading growth, Mathematics growth, History proficiency, graduation rates, and college & career readiness in the all students group) are above the state median for the given year. The lowest 25% subgroup earned at least 50 points in the Reading or Mathematics growth component.	Typical Status Typical Growth Subgroup Growth
D	Reading, Mathematics, and Science proficiency rates are below the state median for the given year. Reading or Mathematics growth in the all students group is below the state median for the given year. At least two of the three additional performance indicators (History proficiency, graduation rates, and college & career readiness in the all students group) are below the state median for the given year. The lowest 25% subgroup did not earn at least 50 points in the Reading or Mathematics growth component.	Low Status Low Growth Low Subgroup Growth
F	Reading, Mathematics, and Science proficiency rates are in the first quartile for the given year. Reading or Mathematics growth in the all students group is not above the first quartile for the given year. The three additional performance indicators (History proficiency, graduation rates, and college & career readiness in the all students group) are below the state median for the given year. The lowest 25% subgroup did not earn at least 50 points in the Reading or Mathematics growth component.	Lowest Status Lowest Growth Low Subgroup Growth

	Reading Proficiency	Math Proficiency	Science Proficiency	Reading Growth	Reading Low Growth	Math Growth	Math Low Growth	History Proficiency	ACT	Grad Rate
State Median	47.9	69.9	50.0	66.1	44.2	83.7	72.2	50.0	56.3	75.6

Appendix B: Preliminary “Cut Scores”

Table 1B. Elementary/Middle Schools

Rating Label	Composite Score	% PTS Earned	%tile
A	518	74.0%	90 th %tile
B	455	65.0%	69 th %tile
C	400	57.1%	42 nd %tile
D	325	46.4%	11 th %tile
F	<325		

Technical Note: **Mean** [418], **Median** [415], **SE** [3], **SD** [76]

	Reading Proficiency	Math Proficiency	Science Proficiency	Reading Growth	Reading Low Growth	Math Growth	Math Low Growth
State Median	54.9	63.1	54.3	65.2	56.0	69.2	55.6

Table 1B.1. Schools at the “A” cut score

SCHOOLID	RDGPROF	MTHPROF	SCIPROF	RDGGROW	RDGGROW_LOW	MTHGROW	MTHGROW_LOW	EST_SCORE
A	64.6	69	35.3	82.9	91.8	86.3	88.2	518
B	78.4	87	86.7	70.2	54.3	80	61	518
C	70.9	80.4	74.3	69.1	67.5	78.7	76.7	518

Table 1B.2. Schools at the “B” cut score

SCHOOLID	RDGPROF	MTHPROF	SCIPROF	RDGGROW	RDGGROW_LOW	MTHGROW	MTHGROW_LOW	EST_SCORE
A	50.6	72.1	49.8	63.4	54.1	83	83.4	456
B	67.6	74.9	63.2	69.4	52	75.3	53.6	456
C	67.7	73.9	60.5	69.9	49	77.6	56.7	455

Table 1B.3. Schools at the “C” cut score

SCHOOLID	RDGPROF	MTHPROF	SCIPROF	RDGGROW	RDGGROW_LOW	MTHGROW	MTHGROW_LOW	EST_SCORE
A	44.1	79.4	20.8	66	56	70.4	63.8	401
B	52.5	53	65.2	61.8	48.2	67.9	51.9	400
C	50	54.7	36.2	66.4	66.7	61.3	64.7	400

Table 1B.4. Schools at the “D” cut score

SCHOOLID	RDGPROF	MTHPROF	SCIPROF	RDGGROW	RDGGROW_LOW	MTHGROW	MTHGROW_LOW	EST_SCORE
A	41.2	32.7	19.7	63.5	53.6	54.7	60.7	326
B	38.9	38.9	25	59.5	72.2	50.9	40	325
C	29.7	44.6	45.8	46.8	46.7	60.9	50	325

Table 2B. High Schools-Final

Rating Label	Composite Score	% PTS Earned	%tile
A	762	76.2%	89 th %tile
B	687	68.7%	73 rd %tile
C	595	59.5%	47 th %tile
D	485 461	48.5% 46.1%	18 th %tile 12 th %tile
F	<485		

Technical Note: Mean [605], Median [610], SE [8], SD [120]

	Reading Proficiency	Math Proficiency	Science Proficiency	Reading Growth	Reading Low Growth	Math Growth	Math Low Growth	History Proficiency	ACT	Grad Rate
State Median	47.9	69.9	50.0	66.1	44.2	83.7	72.2	50.0	56.3	75.6

Table 2B.1. Schools at the “A” cut score

SCHOOL ID	RDGPROF	MTHPROF	SCIPROF	RDGROW	RDGROW_LOW	MTHROW	MTHROW_LOW	HISPROF_HS	ACT_HS	GRAD_HS	EST_SCORE
A	54	70	54.2	94.6	107.3	96	91.8	94.1	28.9	75.5	766
B	64.6	81.5	67.4	84.8	55.6	97.5	89.8	70.7	69.7	83.8	765
C	61.8	98.4	67.2	83.5	43.8	110.3	111.5	39.1	71.4	77.8	765

Table 2B.2. Schools at the “B” cut score

SCHOOL ID	RDGPROF	MTHPROF	SCIPROF	RDGROW	RDGROW_LOW	MTHROW	MTHROW_LOW	HISPROF_HS	ACT_HS	GRAD_HS	EST_SCORE
A	50.7	92.2	52.2	81.3	58.6	109.5	103.3	64.7	#NULL!	82.8	695
B	53.3	65.3	60.8	65.7	51.3	75.7	64.1	66.7	100	88	691
C	63.9	85.1	84	69.4	44.8	96.9	76.3	38.5	66.7	62	688

Table 2B.3. Schools at the “C” cut score

SCHOOL ID	RDGPROF	MTHPROF	SCIPROF	RDGROW	RDGROW_LOW	MTHROW	MTHROW_LOW	HISPROF_HS	ACT_HS	GRAD_HS	EST_SCORE
A	41.6	75.7	51.4	62.5	32.7	94.7	70.7	44.4	54.3	69	597
B	55.2	67.4	45.4	73.9	36.9	75.1	39	59.3	72.6	71.5	596
C	47.4	64.6	60.9	66.8	45.7	73.3	40.2	63	72.4	61	595

Table 2B.4. Schools at the “D” cut score

SCHOOL ID	RDGPROF	MTHPROF	SCIPROF	RDGROW	RDGROW_LOW	MTHROW	MTHROW_LOW	HISPROF_HS	ACT_HS	GRAD_HS	EST_SCORE
-----------	---------	---------	---------	--------	------------	--------	------------	------------	--------	---------	-----------

A	49.2	53.7	53.7	59.8	45.5	64.4	31	#NULL!	53.6	75.2	486
B	20.3	62.5	19	50.7	35	76.7	82.9	23.6	36.5	78.6	486
C	24.1	64.3	30.1	50.2	29.3	78.2	69.5	25.1	52.6	62.3	486

Appendix C: Descriptive Statistics

Elementary Schools

Case Processing Summary

	Cases					
	Valid		Missing		Total	
	N	Percent	N	Percent	N	Percent
EST_SCORE	635	100.0%	0	.0%	635	100.0%

Descriptives

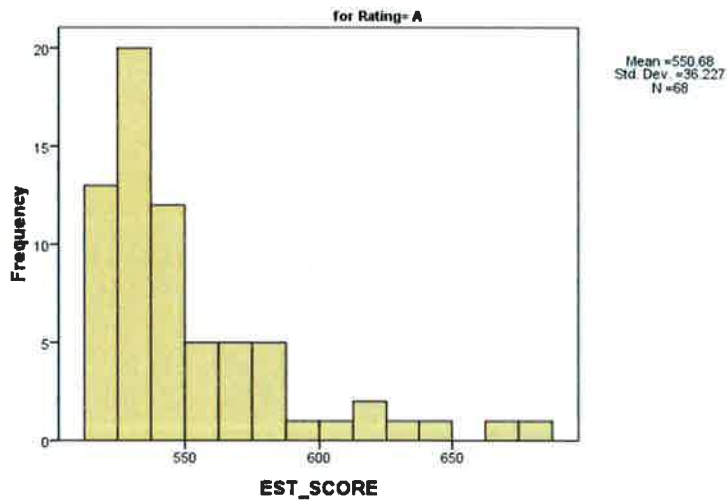
		Statistic	Std. Error
EST_SCORE	Mean	417.55	3.015
	95% Confidence Interval for Mean		
	Lower Bound	411.63	
	Upper Bound	423.47	
	5% Trimmed Mean	416.83	
	Median	415.45	
	Variance	5.774E3	
	Std. Deviation	75.985	
	Minimum	188	
	Maximum	686	
	Range	498	
	Interquartile Range	108	
	Skewness	.169	.097
	Kurtosis	.041	.194

Percentiles

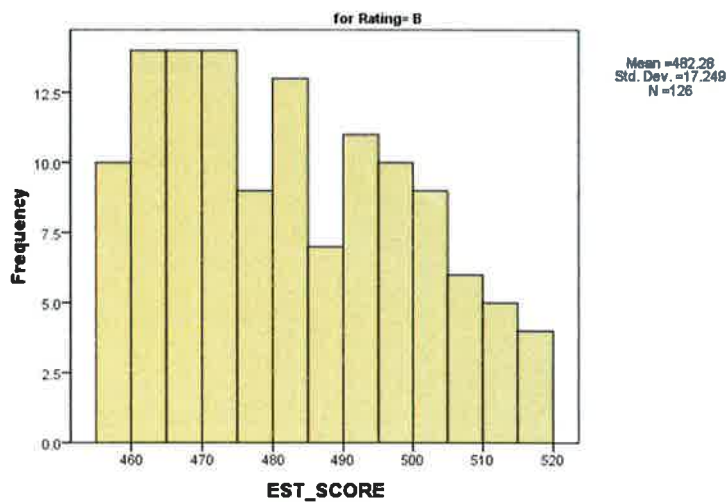
		Percentiles						
		5	10	25	50	75	90	95
Weighted Average(Definition 1)	EST_SCORE	302.37	322.87	361.42	415.45	469.13	518.36	541.92
Tukey's Hinges	EST_SCORE			361.52	415.45	468.80		

Elementary Schools (cont.)

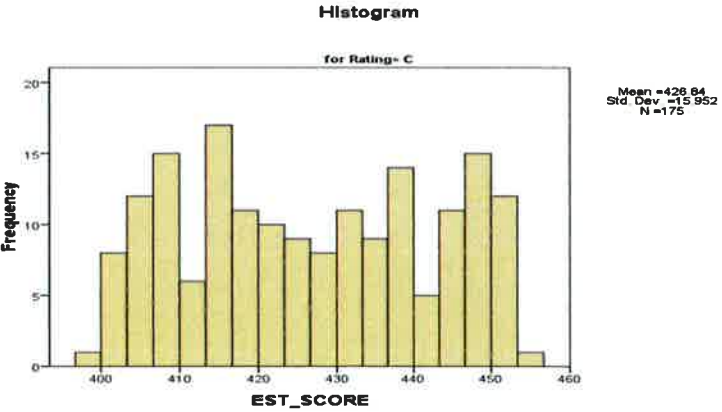
Histogram



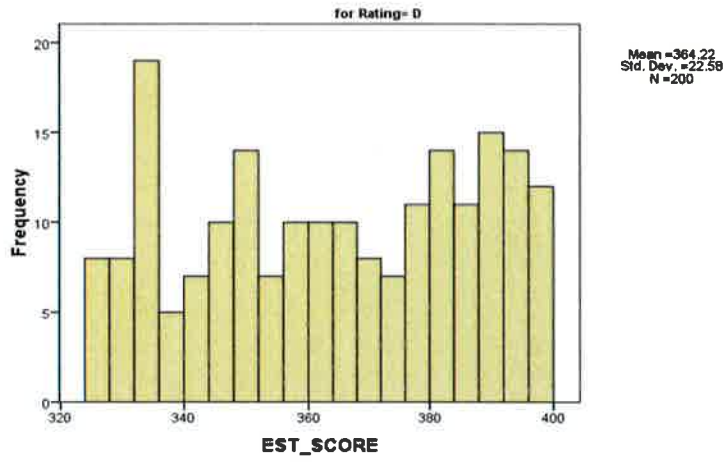
Histogram



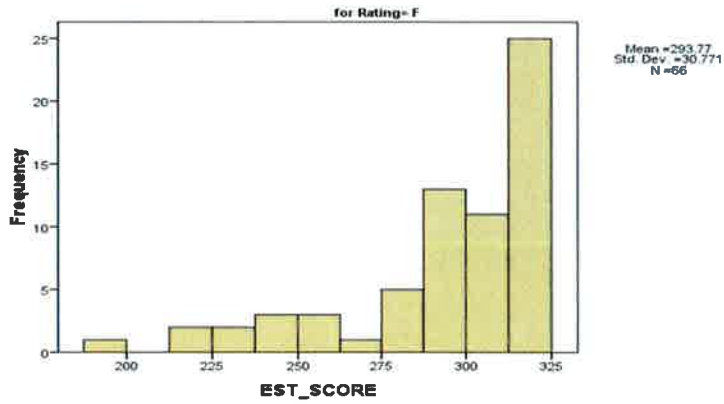
Elementary Schools (cont.)



Histogram



Histogram



High Schools

Case Processing Summary

	Cases					
	Valid		Missing		Total	
	N	Percent	N	Percent	N	Percent
EST_SCORE	250	100.0%	0	.0%	250	100.0%

Descriptives

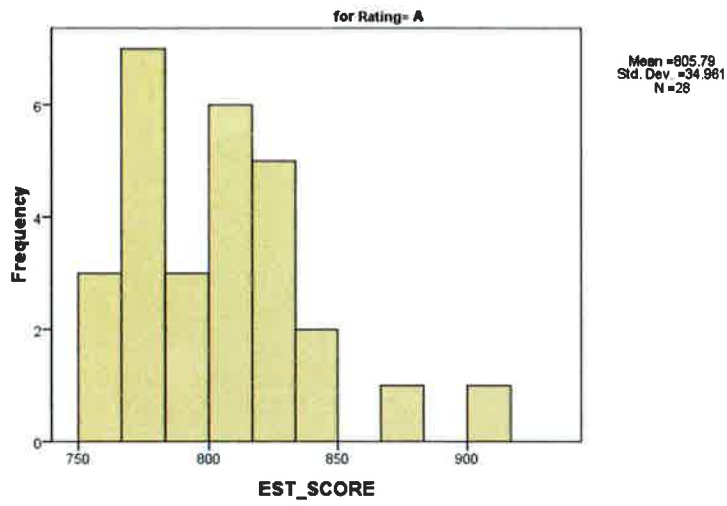
		Statistic	Std. Error
EST_SCORE	Mean	605.372	7.6625
	95% Confidence Interval for Mean		
	Lower Bound	590.280	
	Upper Bound	620.463	
	5% Trimmed Mean	605.733	
	Median	609.830	
	Variance	1.468E4	
	Std. Deviation	1.2115E2	
	Minimum	276.3	
	Maximum	909.0	
	Range	632.7	
	Interquartile Range	180.7	
	Skewness	-.023	.154
	Kurtosis	-.551	.307

Percentiles

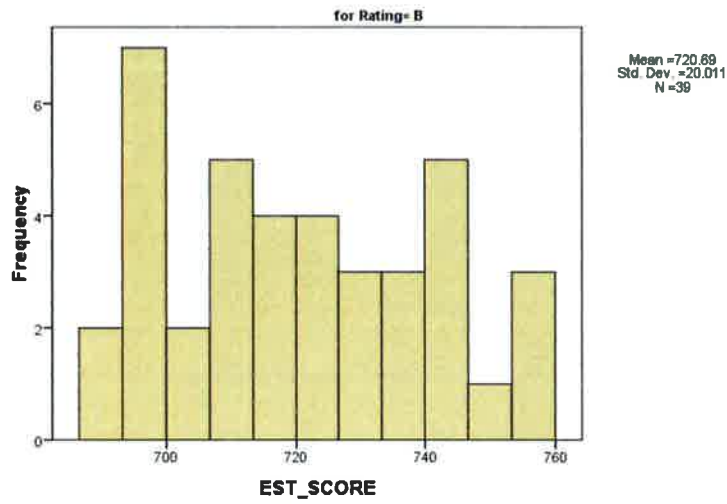
		Percentiles						
		5	10	25	50	75	90	95
Weighted Average(Definition 1)	EST_SCORE	401.954	449.483	516.951	609.830	697.633	767.710	811.375
Tukey's Hinges	EST_SCORE			518.428	609.830	697.432		

High Schools (cont.)

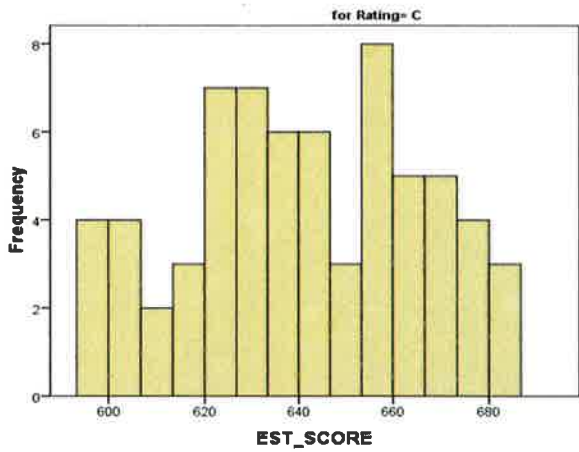
Histogram



Histogram

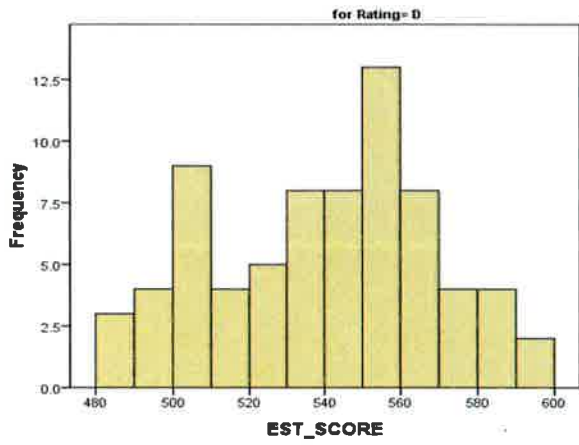


Histogram



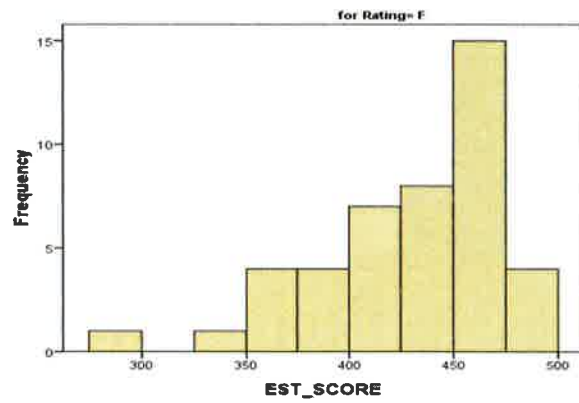
Mean =641.18
Std. Dev. =24.509
N =67

Histogram



Mean =539.84
Std. Dev. =28.621
N =72

Histogram



Mean =429.33
Std. Dev. =46.098
N =44

Katrina McDowell

From: Reba Greer <rblrtr@maxxsouth.net>
Sent: Monday, September 17, 2018 8:54 AM
To: Accreditation
Subject: School Rankings

Having served on Standard development and score settings at a State and in a research setting, I am at a loss to understand the Mississippi situation.

What is actually the purpose and why the continuous changes?

Sent from my iPhone

Katrina McDowell

From: Felicia Ward <feliciaward69@gmail.com>
Sent: Monday, September 17, 2018 1:36 PM
To: Accreditation
Subject: Concerned parent on test scores

Hello to whom it may concern I am a parent of children in the greenwood public school district and I am not ok with the test scores being raised....some students are having problems meeting the test scores that already set. Please don't raise the test scores...

Felicia ward

Katrina McDowell

From: Angela Riley <abriley5@icloud.com>
Sent: Monday, September 17, 2018 1:40 PM
To: Accreditation
Subject: Raising test scores

Good evening,

I am writing with concern about the raising of the test score requirement for students in the MS Delta. I have 3 children currently in the Public School system. They have done well with the test thus far, but if you raise the requirements it will only make it harder for them to continue to pass these tests. Our students should be rewarded and not punished for doing well on these test. If you can please reconsider your decision, it will greatly be appreciated.

Sent from my iPhone

From: TODD BOSWELL <rboswell@cableone.net>
Sent: Monday, September 17, 2018 2:10 PM
To: Accreditation
Subject: Resetting of Baseline Scores

Mr. Alan Burrow, Director
Office of District and School Performance
Mississippi Department of Education

Mr. Burrow,

I am a Mississippi resident with two children- an Ocean Springs Middle School student and a 2016 Ocean Springs High School graduate. The success of our public schools is one of the most important priorities in our state in my personal opinion. I have been an active advocate of and volunteer in public schools since my college student began kindergarten. I am a licensed attorney in Mississippi, but my undergraduate training was in English secondary education. I have very serious concerns about our testing and measurement practices, thus I would like to make this public comment.

I strongly oppose the use of percentiles in setting of baseline scores, and I assert that such destroys the validity of the tests. The use of percentiles in setting scores is just plain offensive to me as a parent, a trained educator and a Mississippian. If a certain number of schools are going to receive an F or other rating regardless of the performance of the students on the test, then the test is unquestionably INVALID. We will not be measuring the amount of knowledge the students were able to gain at school; we will instead only be comparing our schools against each other. If a comparison is the only goal of our testing, then it is a complete waste of taxpayer funds to spend dollars on testing. You could simply make

up an in-house test at MDE and let all students take that test. Use those results to compare our schools against one another, and then assign your pre-set percentile grades to the schools. That sounds outrageous; however, it is the same thing that has been happening every time MDE uses percentiles in setting scores. We spend a great deal of taxpayer dollars on tests that are not even valid.

I know that I cannot rely on your rankings to let me know how my school is doing on your test that is supposedly based on the standards you have chosen. The only information that I can gain is a general understanding of my school's place in a comparison of all schools who administered the test. That information is useless to me and to my student. If you are going to force our students to endure the stress of all of the testing that you are requiring, then the results should be required to be valid at the very least. The only results that are relevant for my student is how he performed on a test that is based only on the standards and only at the appropriate grade level. However, you are not providing that information to me or to my child.

The thought that your percentile plan presupposes that 14 percent of schools will receive an F rating - that enrages me as a Mississippian. That assumes that 14 percent of schools will not be able to educate their students, which is a significant number of Mississippi children. This is a sweeping dismissal of those children, their teachers, and their parents. This is unacceptable as a public policy.

Arbitrary percentiles are unfair and in my mind are a fraud on our students. Students DESERVE a fair test that is not kept hidden from teachers and parents. Students DESERVE scores that actually show them what they learned or failed to learn at the appropriate grade level. Schools DESERVE ratings that actually correspond to the performance of their students instead of being assigned ratings that fit into arbitrary percentiles.

I remain shocked that this percentile practice in a reality within a governmental organization. This practice has rendered Goal #6 of your board's 5-year strategic plan to be an IMPOSSIBILITY. Your percentiles will prevent 38 percent of schools from receiving a C rating simply because you set a policy that kept them at a D or F rating regardless of test performance.

Goal 6: Every School and District is Rated "C" Or Higher

- Outcome: Increase the growth of D and F districts along the A – F spectrum, by improving the letter grade and/or increasing the number of points within a letter grade
- Outcome: Increase the growth of D and F schools along the A – F spectrum, by improving the letter grade and/or increasing the number of points within a letter grade
- Outcome: Increase the growth of districts under conservatorship along the A – F spectrum by improving the letter grade and/or increasing the number of points within a letter grade
- Outcome: Increase the growth of schools under conservatorship along the A – F spectrum by improving the letter grade and/or increasing the number of points within a letter grade
- Outcome: Increase the percentage of districts rated "C" or higher
- Outcome: Increase the percentage of schools rated "C" or higher

Please immediately abandon your effort to use percentiles in setting school rankings. If you must continue with this testing culture, please just make sure that the results are valid, fair and meaningful to students, teachers and parents.

Thank you for the opportunity to comment.

Robin Reid Boswell
rboswell@cableone.net

Katrina McDowell

From: Lawanda Harvey <lawandaharvey58@gmail.com>
Sent: Monday, September 17, 2018 2:35 PM
To: Accreditation

I am a concern parent I do not think you should raise the test scores. The students are having full blown panic attacks trying to reach the passing score now if you raise it it might just make them have a heart attack

Katrina McDowell

From: Veronica Williams <veronicawilliams12@yahoo.com>
Sent: Monday, September 17, 2018 3:00 PM
To: Accreditation
Subject: School Performance and Testing Scores

Good Afternoon:

My name is Veronica Williams and I am a parent of children in Mississippi. First of all I would like to personally thank the system for job well done on making sure that the tests and scores were graded accurately and with proficiency.

I come to you in this email to give my opinion on why I think that the test scores should not be raised in MS. First of all, they need to be taught life experiences and learning from books by reading on a daily, not tested on materials that they can't study. The dropout rate will increase tremendously if they are not given a chance. MS is a state that is already considered to be one of the poorest states, so we should want to better our State by educating our kids to be the best. Everybody is not financial able to give their child homeschool or private school, so they have to result in the public school. We should want as many kids from our State to represent Greatness!! Overall, I saw a lot of posts with excitement from kids and parents all around MS of their scores from last year and that made me proud. But I think to challenge them even more will cause our kids as a whole to fail. Please, I repeat please Do Not Raise the Test Scores!! Please let's start back Teaching to Educate!!! I'm begging!!!

Sent from Yahoo Mail for iPhone

Katrina McDowell

From: John Garner <johnbgr@yahoo.com>
Sent: Monday, September 17, 2018 3:18 PM
To: Accreditation
Subject: accreditation standards

Dear Mr. Burrow,

Do NOT reduce the standards to which the students are held.

John Garner

Loretta McClee
606 W Monroe Ave
Greenwood, MS, 38930
September 17, 2018

Mr. Alan Burrow, Director
Office of District and School Performance
Mississippi Department of Education
P.O. Box 771
Jackson, MS 39205-0771

Dear Mr. Burrow,

Please accept the following comment regarding the revisions in the business rules of the Mississippi Statewide Accountability System to reset the baseline scores for the schools with Grade 12.

Several parents and I are upset with the resetting pattern. Our kids are already on edge with the scoring system as it currently is designed. Some of the kids did not make the minimum, on the previous tests. We currently have to counsel our children, because the tests are engulfing them in unwanted stress. Our prayer circles have become geared toward them passing these tests in order to conquer a milestone in their lives.

It's unfortunate how the already educated are raising the requirements that you as well as others did not have to excel at. I want to know why we are making it harder, while cutting funding to education at the same time. What lessons are we trying to teach our children? In Leflore County we barely have enough teachers and to top it all off our children do not have books to bring home to further prepare them for the tests. Passing this bill will add more stress and increase the dropout rate among public school attendees.

Please consider evaluating our students on the actual progress made over the last two years. MDE should determine a fair process for recognizing the progress already made.

Sincerely,

Loretta McClee

September 11, 2018

Mr. Alan Burrow

Office of School Performance

Mississippi Department of Education

PO Box 771

Jackson, MS 39205-0771

Dear Mr. Burrow –

I ask that you please accept the following as public comments regarding revisions to the business rules of the Mississippi Statewide Accountability System for individual schools containing a Grade 12 for the 2017-2018 school year:

- A. On August 24, the State Board of Education voted to reinstate percentile rankings for schools with a Grade 12. This will be the **third consecutive year** in which percentiles will be used to determine cut scores for Grade 12 schools. Imagine a Chemistry class in which those percentages were used to determine a student's score on his/her final exam. Regardless of how well or how poorly individuals perform, only 10% of the students will make an "A" and 14% will receive an "F". Sound irrational?? Then how can we justify creating an accountability system that does this very thing to our schools with a Grade 12?
- B. The business rules for accountability ratings for the 2017-2018 school year were published well in advance of the 2017-2018 school year. Schools and districts had ample time to prepare their teachers and students for the task at hand. A target cut score was established by MDE and the State Board of Education and schools around the state set out to hit their targeted goal. Seven (7) grade 12 schools across the state reached the "A" level set by these cut scores. They knew their target, knew what they needed to score, and they worked feverishly to hit that mark. Kudos to those students and teachers for making that happen. The percentile method changes all of this and moves schools that failed to reach their target into the "A" grouping as well. Is this fair to the seven schools that achieved an "A" based on the criteria set way before the "game" began?
- C. MDE recently released their new Strategic Plan. Goal 6 states: **EVERY SCHOOL AND DISTRICT IS RATED "C" OR HIGHER** . If that is the goal of MDE and the State Board of Education, then how will it ever be achieved if we continue to use a percentile

ranking? The revised business rules state that *“numerical values will replace percentiles following the appeals’ decision and the final calculations of the accountability model”*. (pg 2). So at that point we will attempt to have designated “cut scores” again? The question was asked in the last board meeting if we could possibly face this dilemma each year (especially with new tests in Science and US History on the horizon) and the answer was “yes”. How many times will we change the rules in the middle, or even worse, at the end of the game?

- D. Speaking of the “appeals’ decision”, Superintendents received an e-mail regarding final accountability results on September 11th. This e-mail stated that final accountability ratings, with grades for each school and district, were available for view in Sharepoint. It also stated that, **“As MDE has done in the past, a media file containing the state’s 2017-2018 accountability data will be provided to all interested media members on Monday, September 17, 2018. If contacted by the media, please be reminded that these data are EMBARGOED until Thursday, September 20, 2018 following the State Board meeting.** If the final accountability decision has yet to be decided, why send out accountability ratings to the school districts and the media? What happens if the State Board decides not to uphold the revisions on September 20th?

I appreciate you taking time to listen to these comments. I understand the monumental task you have to ensure that an accountability system is in place that truly reflects the high standards of our great State. I applaud the dedication from you and your staff.

Thank you again for considering these comments.

Sincerely,



Josh Perkins

Superintendent

Enterprise School District



Thomas D. Parker
Superintendent of Education
5204 HWY 11 North
Ellisville, MS 39437
Telephone (601) 649-5201
Fax (601) 649-1613

September 17, 2018

Alan Burrow, Director
MDE – Office of District and School Performance
359 N. West Street
Post Office Box 771
Jackson, MS 39205-0771

RE: APA Comments – Revision of the MS Public School Accountability Standards, 2018;
specifically the business rules of the MS Statewide Accountability System

Dear Mr. Burrow,

I would like to take this opportunity to thank you for noticing that the grading system for our schools is not reflective of the many improvements that our students and schools experienced this past school year due to the fact that test scores improved and grade levels for schools decreased. I definitely agree that the model needs to change and should certainly begin with the cut points (most especially the 1000 point system). While I agree that the proposed cut scores more closely reflect the actual work performed by students and teachers, I believe the current system for re-establishing the baseline should consider other factors before considering the percentile ranks only due to the potential need to reset these scores each year.

There are a few reasons why the system for determining the cut points should be re-examined using methods other than percentile rank.

Reason 1) We have three types of schools in the state of Mississippi and only two types are represented in the accountability model. The three types are as follows:

- 1) Type 1: Schools without 12th grade (These are K-5, 3-5, K-6, K-8, etc. - 700 point schools).
- 2) Type 2: Schools with a 12th grade that do not have scores reflected from grades below EOC courses (These are 9-12 schools – 1000 point schools).
- 3) Type 3: Schools with a 12th grade that also have scores from elementary and middle school courses (These are K-12, 7-12, 8-12, 6-12 – 1000 point schools).

Type 2 and type 3 schools are combined into one category although they are not the same type of schools. The way the 1000 point system is designed, Type 3 schools only receive half of the points for 5th and/or 8th grade science compared to other schools who receive the full points. Combining schools into this one category also dilutes any 3-8 results with EOC results which may be from the current testing year or may be from a different year due to banking. These two types of schools should not be combined into the same category. If we have three types of schools, we should have three types of point categories: 700 pts., 1000 pts., and 1700 pts.

Approximately two-thirds (2/3) of our 1000 point schools are 9-12 schools, while the other one-third (1/3) of our 1000 point schools are 6-12, 7-12, 8-12, K-12 schools. Using the information found in the media file for the 2016-17 Accountability results, ALL 50 "A" ranked schools are 9-12 (Type 2) schools. The first school ranking that occurs for a Type 3 school is number 55. Also, according to the 2016-17 report, approximately 63% of "D" and "F" rated schools are Type 3 schools. Some of this disparity among school distributions may be due to the difference in the types of schools and should be investigated further to be sure that we are comparing apples to apples.

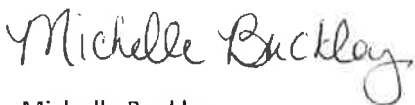
The current accountability model cut points are being determined based upon percentile ranks where two different school types are being combined into the same category.

Reason 2) During the state board meetings regarding this change (8/16/18 and 8/23/18), officials admit that we may need to re-examine these cut points each year due to changes in assessments and reporting categories. Each time the cut scores are reset using percentile ranks, there must always be schools at the bottom in the failing category. When schools are placed in those categories, extensive work, resources, and monies are spent to ensure school improvement supports are provided for those schools. In MDE's strategic plan goals, item 6 states, "Every School and District is Rated 'C' or Higher". When percentile ranks are used repeatedly to reset the cut scores, someone will always be on the bottom with no regard for this strategic goal. Percentile ranks should be used as verification of the scoring distribution based upon a model when considering baseline score setting and should not be considered the model itself. We need to design an accountability model which strives to assign a "Grade" to our schools instead of a "Rank" to our schools.

Reason 3) When the cut scores are reset each year as changes occur, schools and districts do not know what their "grade" will be. When we set goals, our goals should be specific and measurable yet our statewide grading scale is neither specific nor measurable until after all of the data is in. Schools and districts should be given a set of standards that should be met to achieve "A" status. Levels falling below that target, should determine other grade levels. When our students come to class, they are graded based upon how well they can meet a set of standards and guidelines not based upon how well everyone else is doing. If I used the current accountability model for our students, I would always have students who have an "F" with no regard for specific goal attainment. Likewise, grades for our schools should be assigned based upon the ability to meet a defined set of standards.

While changing the cut scores this year to the proposed changes is more closely reflective of actual performance, I look forward to investigating and exploring ideas that may improve upon our current accountability grading system. Thank you for your consideration in this matter as we all work together to strive for student success and improved achievement for all of Mississippi's children.

Sincerely,



Michelle Buckley
Accountability Director
Jones County School District

Katrina McDowell

From: Laurel <laurel_tifle@yahoo.com>
Sent: Monday, September 17, 2018 4:35 PM
To: Accreditation
Subject: Public comments regarding baseline scores for the statewide accountability system

Dear Mr. Burrow:

I write to you both as a concerned parent of a child in the Hattiesburg Public School District, and as an educator who is committed to public education in this state. I am dismayed at the plan to once again use percentile rankings; it's incredible to me that these will predetermine a smaller number of A schools than F schools. This system is arbitrary and unethical. Schools should be evaluated on their progress over recent years, rather than continuing to have their baseline moved. It is very important that a fair process for determining baseline scores be followed and that that process be transparent to stakeholders. Please do the right thing by Mississippi's children.

Thank you for your time,

Dr. Laurel Abreu
10 Alexander Dr
Hattiesburg, MS 39402

Katrina McDowell

From: Alexandra Melnick <alexandrasmelnick@gmail.com>
Sent: Monday, September 17, 2018 4:59 PM
To: Accreditation
Subject: Public Comments: MDE Proposal to Reset High School Cut Scores

Hello Mr. Burrow,

I am submitting my public comment about the possible reset of High School Cut Scores.

It is my belief that resetting the cut scores would compromise our state data and undermine the overall validity of our state tests in terms of accurately measuring the successes and failures of our students.

Alexandra Melnick

September 17, 2018

Mr. Alan Burrow, Director
Office of District and School Performance
Mississippi Department of Education
P.O. Box 771
Jackson, MS 39205-0771

Dear Mr. Burrow,

Please accept the following public comments regarding revisions in the business rules of the accountability system that would be applied to the current school year:

1. High schools should be evaluated on growth made over the last two school years, which would accurately reflect and reward the work of teachers and students in building that have a 12th grade.
2. All scores should be reset every year to establish baseline targets for each grade label for schools and districts and to encourage a spirit of collaboration and support among districts. In turn, this would inevitably help scores statewide in lieu of breeding an atmosphere of districts being only concerned about themselves as there is a current system in place that only allows for a certain number of A's regardless of scores and growth.

Thank you for considering these comments.

Sincerely,

Dr. Karen Norwood
Assistant Superintendent
Biloxi Public Schools

Katrina McDowell

From: Eva Bengten <eva.bengten@gmail.com>
Sent: Monday, September 17, 2018 4:04 PM
To: Accreditation
Subject: Public comment regarding revisions in the business rules of the Mississippi Statewide Accountability System

September 17, 2018

Mr. Alan Burrow, Director,
Office of District and School Performance
Mississippi Department of Education
P.O. Box 771
Jackson, MS 39205-0771

Dear Mr. Burrow,

Please accept the following public comment regarding revisions in the business rules of the Mississippi Statewide Accountability System to reset the baseline scores for schools with Grade 12 effective for school year 2017-2018.

I wish that the Mississippi Department of Education would consider using a fair and just accountability scoring based on the schools and districts meeting set quality standards. The percentile ranking is an outdated, arbitrary and irrational system of grading schools and districts.

Rather than resetting the accountability cut scores every year and determining the rating based on the ranking, efforts should be made to establish target scores for the A through F ratings so that parents and students can understand how their schools and districts scored. This would provide a transparent system where efforts in teaching and learning are reflected in the ratings.

Thank you for considering these comments.

Regards,

Eva Bengten

Eva Bengten, Ph.D.

Murrah High School Parent