OFFICE OF CHIEF ACCOUNTABILITY OFFICER Summary of State Board of Education Agenda Items May 9, 2019

OFFICE OF DISTRICT AND SCHOOL PERFORMANCE

O2. Approval to revise the business rules of the Mississippi Statewide Accountability System effective for school year 2018-2019 and thereafter [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]

(Has cleared the Administrative Procedures Act process with public comments)

<u>Background Information</u>: The Commission on School Accreditation (CSA) met in a special-called meeting on Thursday, March 21, 2019, and approved the proposed revisions to the business rules of the Mississippi Statewide Accountability System. The proposed revisions from the Accountability Task Force and MDE will modify the business rules outlined below:

- 1) Assignment of Performance Classification for Nontraditional High School Configurations (Section 1.7)
- 2) Acceleration (Section 9)
- 3) English Learners (EL) (Section 15)
- 4) Alternative, Career and Technical, and Child Development Centers (Section 21)
- 5) Other
 - General updates to language for Every Student Succeeds Act (ESSA),
 - Address technical issues that have arisen in the past,
 - Clarify language for existing business rules, and
 - Remove obsolete language or language no longer applicable.

The public comment period was open through 5:00 p.m. April 30, 2019 with 42 public comments received. There were 21 comments in favor, 16 comments against, two comments that varied by section, and three that were unrelated to the proposed changes. There are no recommended changes to the business rules in response to the APA process.

This item references Goals 1, 2, 3, 4, 5, and 6 of the *Mississippi Board of Education 2018-2022 Strategic Plan*.

Recommendation: Approval

Back-up material attached

PERFORMANCE STANDARDS

The Mississippi Statewide Accountability System is designed to improve student achievement and increase the level of accountability for both school districts and individual schools. The accountability system focuses on student performance at each school and at the district level. Performance standards have been established, and student data from established performance metrics are used to determine individual school performance classifications and district level performance classifications.

The following specifications for establishing school and district performance standards and accountability requirements are addressed in Miss. Code Ann. §37-17-6(5), §§ 37-18-1 through 37-18-7.

The SBE shall establish, design, and implement a program for identifying and rewarding public schools that improve. The SBE shall apply an "A," "B," "C," "D," and "F" designation to the school and school district statewide accountability performance classifications outlined in Miss. Code Ann. §37-17-6(5).

A school shall be identified as a School At-Risk and in need of assistance if the school is designated as an "F," as identified by the SBE. See Accreditation Policy 3.4

INCLUSION OF STUDENTS WITH DISABILITIES AND ENGLISH LEARNERS (EL)

The Mississippi Statewide Assessment System provides procedures to ensure the inclusion of all students in the assessment programs, including a wide range of testing accommodations, instructional level testing on statewide assessments and alternate assessments. The data for students using testing accommodations are treated no differently from any other test data. The scores for students with disabilities taking alternate assessments are included in the achievement and growth components. The weighting procedures in the achievement component ensure that those students count equally within the achievement level assigned to the school.

School districts are allowed to exclude the academic achievement results only for first-year English Learners (EL) students (on a case-by-case basis) from determinations of Mississippi Statewide Accountability System results, consistent with the requirements of the Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act (ESSA).

MISSISSIPPI STATEWIDE ACCOUNTABILITY SYSTEM, EFFECTIVE 2013-2014

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

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

- 1. Reading Proficiency
- 2. Reading Growth All Students
- 3. Reading Growth Lowest Performing Twenty-Five Percent Student Subgroup
- 4. Math Proficiency
- 5. Math Growth All Students
- 6. Math Growth Lowest Performing Twenty-Five Percent Student Subgroup
- 7. Science Proficiency

For schools (and districts) with 12th grade, the following schedule will be used:

During the 2013-2014 school year, schools (and districts) with 12th grade will have nine (9) components, totaling 900 possible points:

- 1. Reading Proficiency (100 points)
- 2. Reading Growth All Students (100 points)
- 3. Reading Growth Lowest Performing Twenty-Five Percent Student Subgroup (100 points)
- 4. Math Proficiency (100 points)
- 5. Math Growth All Students (100 points)
- 6. Math Growth Lowest Performing Twenty-Five Percent Student Subgroup (100 points)
- 7. Science Proficiency (50 points)
- 8. U.S. History Proficiency (50 points)
- 9. Graduation Rate All Students (200 points)

During the 2014-2015 school year, schools (and districts) with 12th grade will have nine (9) components, totaling 900 possible points:

- 1. Reading Proficiency (100 points)
- 2. Reading Growth All Students (100 points)
- 3. Reading Growth Lowest Performing Twenty-Five Percent Student Subgroup (100 points)
- 4. Math Proficiency (100 points)
- 5. Math Growth All Students (100 points)
- Math Growth Lowest Performing Twenty-Five Percent Student Subgroup (100 points)
- 7. Science Proficiency (50 points)
- 8. U.S. History Proficiency (50 points)
- 9. Graduation Rate All Students (200 points)
- 10. DELETED

Beginning with the 2015-2016 school year, schools (and districts) with 12th grade will have 11 components, totaling 1000 possible points:

- 1. Reading Proficiency (100 points)
- 2. Reading Growth All Students (100 points)
- 3. Reading Growth Lowest Performing Twenty-Five Percent Student Subgroup (100 points)
- 4. Math Proficiency (100 points)
- 5. Math Growth All Students (100 points)
- Math Growth Lowest Performing Twenty-Five Percent Student Subgroup (100 points)
- 7. Science Proficiency (50 points)
- 8. U.S. History Proficiency (50 points)
- 9. Graduation Rate All Students (200 points)
- 10. College- and Career-Readiness (Math 50% and English/Reading 50%) (50 points)
- 11. Acceleration (Participation and Performance Combined) on the following sliding scale:
 - a. Year 1 (2015-2016): Participation 70%/Performance 30% (50 points)
 - b. Year 2 (2016-2017): Participation 60%/Performance 40% (50 points)
 - c. Year 3 (2017-2018) and beyond: Participation 50%/Performance 50% (50 points)

Mississippi Statewide Accountability System: Business Rules

1. Assignment of Performance Classifications

- 1.1 Standards for student, school, and school district performance will be increased when student proficiency is at a 75% and/or when 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. See Miss. Code Ann. § 37-17-6.
 - 1.1.1 When performance classification cut-points are established, the following percentiles shall apply:

1.2 Grades for schools (and districts) with no 12th grade (elementary/middle schools) shall be determined based on the following cut-points effective with the 2016 - 2017 school year:

1.3 Grades for schools with a 12th grade will be determined based on the following cut-points effective with the 2017 - 2018 school year:

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

- 1.5 Assignment of district performance classifications shall be calculated by treating the district as one (1) large school based on the same performance classifications used for schools.
- 1.6 Cut-points for schools/districts shall be reviewed following the implementation of a new assessment.
- 1.7 Schools with grade configurations that include both 12th grade and grades below 9th grade shall have a performance classification assigned consistent with Section 1.3, but the composite score shall be adjusted to account for the inclusion of performance measures for students below 9th grade. The following process shall apply:
 - 1. Compute a composite score separately for students in grades below 9th grade and for students in 9th through 12th grades.
 - 2. Transform the composite score for students in grades below 9th grade to the scale consistent with Section 1.3.
 - 3. Weight each composite score by the percentage of students represented in the calculation and add the two (2) weighted scores together to obtain the adjusted composite score.
 - 1.7.1 The adjustment provided for in this section shall not be applied in the calculation of cut-points for districts and schools.
 - 1.7.2 The adjustment provided for in this section shall only apply in the assignment of the performance classification and shall not apply to federally-required school identification measures.

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% (≥ 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 calculation of FAY. 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. If 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 performance classification 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.
 - 2.11 If a student has concurrent enrollment in more than one (1) school/district, the period of concurrent enrollment will be included in FAY calculations at both locations.

3. N-Count Minimums

3.1 School Totals

- In order for a school to earn a performance classification, 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 will have data from prior years combined with the current year [up to three (3) years of data] in order to achieve the minimum N-count. See Sections 15, 22, and 24 for exceptions to this rule.
- 3.2 N-Count Minimums for the Lowest Performing Twenty-Five Percent Student Subgroup
 - 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 Twenty-Five Percent Student 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 Twenty-Five Percent Student 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 Twenty-Five Percent Students subgroup. 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 subgroup for that grade level for that subject.

Note: See Section 7 for more information on the Lowest Performing Twenty-Five Percent Student subgroup.

4. Participation Rates

- 4.1 If a school/district does not meet an overall 95% participation rate, the school/district will automatically be dropped one (1) performance classification and will have 95% of its enrollment included in proficiency calculations, as required by federal regulation. Participation rates are not rounded.
- 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 end-of-course, subject area assessments 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 end-of-course, subject area 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.

- 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 Beginning with the 2015-2016 academic year, the ACT assessment will be included in 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.
 - For proficiency components worth 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 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 end-of-course, subject area assessments. This includes all Alternate Assessments based on Alternate Achievement Standards (AA-AAS) for SCD students. Note: 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. If 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 end-of-course, subject area assessments.
- 6.9 For students taking end-of-course, subject area 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 end-of-course, subject area 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 3rd through 8th grades 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.

7. Lowest Performing Students

- 7.1 Calculation methodology for students whose baseline assessment score is 3rd through 7th grade:
 - 7.1.1 The Lowest Performing Twenty-Five Percent Student subgroup in reading and the Lowest Performing Twenty-Five Percent Student 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 students in a school is applied separately by grade, and the identified students are combined across all grades to comprise the Lowest Performing Twenty-Five Percent Student subgroup and to determine learning gains.

Note: The Lowest Performing Twenty-Five Percent Student subgroup will be determined by identifying the percentage 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.
- 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 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.
- 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 Lowest Performing Twenty-Five Percent Student subgroup for that
 subject/grade.

6. Repeat the process for each grade for the subject then combine students to form the Lowest Performing Twenty-Five Percent Student subgroup for the school for the subject.

Note: The number of students in the Lowest Performing Twenty-Five Percent Student 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. It is possible for the Lowest Performing Twenty-Five Percent Student subgroup to be more than 25% when steps 5 and 6 are applied.

7.1.2 DELETED

- 7.1.3 The Lowest Performing Twenty-Five Percent 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 Twenty-Five Percent Student subgroup. Therefore, a student may be identified in the Lowest subgroup in one (1) school, but not the other.
- 7.2 The Lowest Performing Twenty-Five Percent Student 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 Twenty-Five Percent Student 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].

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 or state-defined alternate 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 (9th) 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.
- 8.2 Ungraded students will be assigned to their peer-age cohort, based on the year in which the student obtains the age of 14 prior to September 1.
- 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 In the calculation of graduation rates, students are assigned to the school and district of longest enrollment during the federally-defined, four-year adjusted cohort window. In the event a student has equal enrollment in one (1) or more schools or districts, the student will be assigned to the school and district of final enrollment.
- 8.5 The school/district graduation rate applied in the graduation component is lagged one (1) 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 accelerated courses which include Advanced Placement (AP), International Baccalaureate (IB), Advanced International Certificate of Education (AICE), dual credit or SBE-approved industry certification courses. For students taking dual credit courses,

passing refers to students who are passing the course with an unweighted "C" or above. For AP courses, the student must score at least three (3) on the AP exam. For IB courses, the student must score at least four (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 Dual credit courses must be credit-bearing courses with a minimum of three (3) semester hours credit, and beginning in school year 2019 2020, shall be limited to the list of articulated courses found in Appendix V of the current *Procedures Manual for the State of Mississippi Dual Enrollment and Accelerated Programs* document. Refer to the current edition of the *Approved Courses for Secondary Education* for approved Career and Technical Education (CTE) courses.
- 9.2.2 Beginning in school year 2019 2020, non-weighted, course grades for dual credit courses must be provided by the post-secondary institution issuing credit for the course.
- 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): (Participation-70%/Performance-30%) ÷ 2
 - b. Year 2 (2016-2017): (Participation-60%/Performance-40%) ÷ 2
 - c. Year 3 (2017-2018) and beyond: (Participation-50%/Performance-50%) ÷ 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 as defined in Section 9.2.
 - 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. Ninth (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 dual credit 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.
- 9.9 For students taking and passing accelerated courses in AP, IB, AICE, or industry certification that have a normed, end-of-course assessment, the numerator will be doubled in weight.
- 9.10 For students in 9th through 12th grade that participate in accelerated courses as described in Section 9.2 that are designed with a two (2) year curriculum and do not have an associated assessment in the first year, the student will be included in participation calculations but will be excluded from performance measures in the first year and will be included in both participation and performance measures in year two (2).

10. Banking Scores: End-of-course, subject area assessments taken before 10th grade

- 10.1 Scores of students taking Algebra I, Biology, English II, or U.S. History end-of-course, subject area tests 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: See Section 4 (Participation) and 6 (Growth) for additional information.
- 10.3 If a student matriculates from the 9th grade to the 11th grade without enrolling in the 10th grade, banked scores will be included in accountability measures when the student is enrolled in the 11th grade.

11. Comprehensive Support and Improvement Schools (CSI)

- 11.1 Title IA High Schools with a graduation rate less than or equal to 67 percent shall be identified as a Comprehensive Support and Improvement school. This identification will occur on a three (3) year cycle.
- 11.2 Title IA schools with a composite accountability score in the bottom five (5) percent of overall accountability index will be identified as a Comprehensive Support and Improvement school. This identification will occur on a three (3) year cycle.
- 11.3 Beginning with the 2021-2022 academic year, a school previously identified as an Additional Targeted Support and Improvement school with three (3) consecutive years of subgroup proficiency performance in ELA or math at or below that of all students in the bottom five (5) percent of Title IA schools shall be identified as a Comprehensive Support and Improvement school. This identification will occur annually.

12. Targeted Support and Improvement Schools (TSI)

- 12.1 A school with a subgroup composite score that is in the lowest 50 percent and in the lowest quartile of the three (3) year average gap-to-goal, and in the lowest quartile of the three (3) year improvement toward gap-to-goal closure shall be identified as a Targeted Support and Improvement school.
- 12.2 Schools meeting the requirements in Section 12.1 will be rank-ordered annually, using the composite accountability score, and the bottom five (5) percent of all schools not identified for

Comprehensive Support and Improvement will be identified as a Targeted Support and Improvement school.

13. Additional Targeted Support and Improvement Schools (ATSI)

13.1 A school with a three (3) year average subgroup performance score at or below that of all students in the lowest performing five (5) percent of Title IA schools shall be identified as an Additional Targeted Support and Improvement school.

14. DELETED

15. English Learners (EL)

- 15.1 The scores of English learners who have attended a U.S. school for less than 12 months will only be included in participation calculations in the first (1st) year. In the second (2nd) year, growth will be included, and in the third (3rd) year, growth and proficiency will be included in accountability measures.
 - 15.1.1 Local Education Agencies (LEA) shall 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. Note: For more information, contact the Office of Federal Programs.
- 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 Section 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% 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 (5) years of entry into an EL program. The annual progress goal will be equal to the minimum score needed to achieve proficiency at year five (5), 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 five (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 zero (0) and one (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 zero (0). No student will receive a rate higher than one (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.

16. Students with Disabilities

- 16.1 United States Department of Education (USDE) regulations limit the number of scores of children taking alternate assessments for SCD students scoring proficient or above to one percent (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 greater than one percent (1%) of their total population scoring proficient or above on an alternate assessment, the percent above one percent (1%) will count as not proficient in accountability calculations.
- 16.2 All eligible SCD students will be expected to participate in statewide assessments per the schedule provided by the Office of Student Assessment. Note: 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 shall be considered invalid.
- 16.4 Students with disabilities will be those students whose SPED indicator in MSIS is "Y" (Yes) at the end of month eight (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. If 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

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Students with invalid test scores will be counted as "not tested" for participation calculations.18.1.1 Following an invalidated score, when a student retests, the first valid test score will

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 performance classifications have been assigned, the school/district's performance 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 For students in 3rd grade through eighth 8th grade, 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, and 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 end-of-course, subject area assessments or high school alternate assessments.

19. Rounding

19.1 In the calculation of each of the components in the statewide 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 performance classification calculation.

Example:

<u>, </u>	
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 FAY at the time of testing. See Section 2 for details on FAY. 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 Child Development Centers

21.1 Effective before and with the 2017 – 2018 academic year, no performance classifications-will be assigned to alternative, career and/or technical programs, or child development centers authorized in Miss Code Ann. §37-23-91. Scores of students attending these programs will be included in the accountability calculations of the student's official MSIS home school of residence.

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, ReadingLowest Performing Students, and Math-Lowest Performing Students for that
 Pre-K through 2nd grade school. The students would have to have met FAY in
 - o the Pre-K through 2nd grade school during 2nd grade,
 - o the 4th grade school in the same district, and
 - o 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 the 3rd grade 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, ReadingLowest 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 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 and ending with the 2017-2018 school year, the cutpoints established for elementary/middle schools that do not have science scores will remain static in succeeding years. In subsequent years, the cut-points shall 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 will have available proxy data applied in the following order of availability; three (3) year historical school average, two (2) year historical school average, prior year school score, current year district score, prior year district score. 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 be assigned the school performance classification of the next level school to which that school feeds. If the school feeds to multiple schools, the performance classification 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 be assigned performance classifications.
 - 23.1.2 If a student takes an end-of-course, subject area 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 DELETED

- 23.3 Other State/Special Schools
 - 23.3.1 State agencies (i.e., Hudspeth, Ellisville State School, etc.) will not be assigned performance classifications.
 - 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 performance

- measures included in the calculations of the school/district in which he/she is enrolled in MSIS.
- 23.3.3 Students enrolled in special/non-public schools with codes 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 performance classifications.
 - 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 Education Data Exchange Network (EDEN) reporting requirements as a separate school entity will receive a performance classification

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 performance classification because it will be based on the same data calculations.

25. College- and 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- and Career- Readiness Indicator.
- 25.2 The College- and 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 50 points: (Math + English/Reading) ÷ 2
- 25.3 A student will be included in the numerator for Mathematics if he/she is considered Collegeand 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- and 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- and Career- Readiness component.
- 25.6 ACT Composite scores will not be included in the College- and Career- Readiness component. (Rationale: ACT does not designate a composite score to indicate college readiness.)
- 25.7 The highest available sub-score for each student at the end of month nine (9) in Mathematics and English/Reading, as described above, will be used in the College- and Career- Readiness Indicator accountability calculations.

25.7.1 DELETED

- 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 11th graders. Ungraded students whose birthdates link them to the cohort of students identified as 11th graders will also be included. Students may take the ACT as many additional times as they choose, at their own expense.
- 25.9 If the IEP committee deems it appropriate, an SCD student may participate in the administration of the ACT.
- 25.10 The ACT scores of all students identified in the Senior Snapshot will be included in the calculation.
- 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- and 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- measures. Senior Snapshot captures ALL students who have been enrolled in a Mississippi public school starting in month one (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 Beginning in 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

The Office of Accreditation received the following APA comment(s) to revise the business rules of the <u>Mississippi Statewide Accountability</u> System effective for school year 2018-2019 and thereafter

Summary of Comment	MDE Response
As a concerned citizen and supporter of public education, "I am in agreement with the proposed revisions to the business rules of the Mississippi Statewide Accountability System as outlined by the Parents' Campaign."	
I agree that public school children, their parents and our state are best served by an accountability system "that reflects high standards and that provides a fair and accurate measure of the quality of education being provided in Mississippi's public schools."	:-
(Section 1.7)	
These changes are needed and directly affect our school district. They are positive changes allowing each student's score to count without regard for the school configuration.	
(Section 9)	
This change supports schools in making decisions regarding course offerings	
that best meet the goals of each student.	
(Section 15)	ii
These changes are needed. This allows every school regardless of their	
school demographics to receive credit for student performance.	

Summary of Comment	MDE Response
First, it seems that changing targets at this late date in the school year is unfair to school districts.	The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.
Second, arbitrarily deciding ahead of time the percentage of F schools and so forth does not allow each school district the same chance to attain a high ranking.	Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year and it does not change currently established cuts.
Privileging the performance of districts that can afford opportunities such as dual enrollment and AP offerings over districts with fewer resources will only lead to more stratification of school districts in the state, where schools with fewer resources will continue to be ranked lower and lower, simply because they don't have the support for these extra categories. (9.5)	The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
A school/district should not be dropped a letter grade because they did not fit a certain percentile. I disagree with weighing some areas more than others. It seems to favor a small number of districts.	Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This change does not affect performance classification assignment. Performance classifications are assigned based on the school or district's composite score using established cuts.
	The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.

Summary of Comment	MDE Response
The minority of districts in this state that have EL populations will be punished with this new proposed EL component.	Proposed changes to the methodology regarding how the EL component impacts the composite score is in response to feedback from schools and districts regarding the concern that having an EL component may only negatively impact the composite score. The proposed change makes the component consistent with other components in the model and allows for impact to be responsive to relative performance on other indicators. This change does not necessarily favor schools/districts with an EL component or without the component.
Dual Credit and AP classes have been considered equal courses in the model. What changed in the research that supports this radical change? Please explain so that we might explain.	The proposed changes to the Acceleration component address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
I am concerned on the change to the acceleration component. I disagree with the doubling of the AP weight. If our goal is to make students college ready, it seems that completing a college course is just as good as completing an AP course.	The proposed changes to the Acceleration component address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
(Section 9) There should not be changes to the acceleration component. The changes in the acceleration component create inequitable circumstances for high schools and district across the state.	The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
(Section 15) I see no changes that will make the EL component equitable for all schools and districts. Question: Have changes in Business Rule 15 been made to allow for a more equitable EL component for all schools and districts in the state?	Proposed changes to the methodology regarding how the EL component impacts the composite score is in response to feedback from schools and districts regarding the concern that having an EL component may only negatively impact the composite score. The proposed change makes the component consistent with other components in the model and allows for impact to be responsive to relative performance on other indicators. This change does not necessarily favor schools/districts with an EL component or without the component.

Summary of Comment	MDE Response
The current accountability model has a negative impact for schools that have an n-count of greater than 10. Please consider not penalizing schools that have an influx of EL students.	The EL component is a Federal Requirement under ESSA and must be included in the Mississippi Statewide Accountability System.
At this point in the school year, no changes should occur in the previously established accountability system. It would be completely unfair to make such changes when the majority of the school year is complete.	The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.
"When performance classification cut-points are established, the following percentiles shall apply." How often will cut-points be established? Will they change every year?	Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year.
In the past, it was punitive for school districts which met the N count of ten, now it seems it may benefit those districts with an EL population, giving them an advantage. over the districts which do not meet the N count.	Proposed changes to the methodology regarding how the EL component impacts the composite score is in response to feedback from schools and districts regarding the concern that having an EL component may only negatively impact the composite score. The proposed change makes the component consistent with other components in the model and allows for impact to be responsive to relative performance on other indicators. This change does not necessarily favor schools/districts with an EL component or without the component.
Changes to Rule 8.4, which address the graduation rate, are a great concern for our district. Our population can be very transient.	The proposed revision in Section 8.4 is a clarification of existing policy and is consistent with the Comprehensive State Plan under ESSA. The current methodology for calculating graduation rates was applied in 2017, consistent with requirements under ESSA.

Summary of Comment	MDE Response
The first concern is that we are recommending changes to the system in April of the year, basically changing the playing field in the final quarter of the game.	The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.
Second, continually changing the cut scores makes it more difficult for districts to be successful.	Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year. The MDE does not intend to continually change cut scores.
(Section 9) Not in favor of changes Placing a greater value on IB and AP courses put students and districts in a difficult position as the success rate on these models is not as high as for Dual Credit/Dual Enrollment.	The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
The component addressing EL student success, the recommendation	Proposed changes to the methodology regarding how the EL component impacts the composite score is in response to feedback from schools and districts regarding the concern that having an EL component may only negatively impact the composite score. The proposed change makes the component consistent with other components in the model and allows for impact to be responsive to relative performance on other indicators. This change does not necessarily favor schools/districts with an EL component or without the component.
Sections 15.3 and 15.4.3 I agree with the proposed changes.	
The policy guarantees a certain number of "F" districts each year no matter how hard the districts work or how much the districts	Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year and does not establish a certain number of "F" districts or schools.

Summary of Comment	MDE Response
Neither the changes concerning additional weight for advanced placement nor I.B. should be considered for this school year, if ever. To implement these changes this year would be to change the rules at the "end of the game".	The proposed changes to the Acceleration component address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade. This change does not negatively impact any school or district.
International Baccalaureate is unique in that only two or three districts in the entire state of Mississippi offer it and thus they will be the only districts with an opportunity to achieve these additional points if this is implemented now. It is my belief that high performing schools would benefit most from the changes thereby causing them to earn more points. I do agree that recommendations to adjust the model for unique grade configurations such k-12 due to the fact that our model does not accurately reflect a true comparison of schools as it currently stands.	IB is an option for a district to participate in and receive credit under the Acceleration component. There are many options available and participation among districts varies significantly across the various programs.
I do not believe that section 9.9 should give more or less credit to one accelerated credit over another. The ability to provide AP,IB,AICE or industry certifications are very much dependent on wealth of a district and possibly more importantly the wealth of individual students and their families.	The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.

	Summary of Comment	
he proposed changes	should be NOT be applied	

The proposed changes should be NOT be applied to the accountability results for this school year (2018-19). It is unfair to change the rules after the game has been played.

The recommendation to change Rule 1.1.1to add "When performance classification cut-points are established, the following percentiles shall apply," needs further clarification. How often will these be established?

The recommendation for changes to Rule 9 addresses the acceleration component. My suggestion is that all changes in this section be rejected. The changes that are being recommended in this section create an inequitable playing field for schools across the state.

(Section 15)

The new recommendation has been adjusted to an advantage for those schools which meet the requirements for an EL component-now making it less advantageous for schools without an EL subgroup.

(Section 8.4) addresses the calculation of graduation rate. We need to go back to the apportionment method that we used previously.

MDE Response

The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.

Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year.

The proposed changes to the Acceleration component address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.

Proposed changes to the methodology regarding how the EL component impacts the composite score is in response to feedback from schools and districts regarding the concern that having an EL component may only negatively impact the composite score. The proposed change makes the component consistent with other components in the model and allows for impact to be responsive to relative performance on other indicators. This change does not necessarily favor schools/districts with an EL component or without the component.

The proposed revision in Section 8.4 is a clarification of existing policy and is consistent with the Comprehensive State Plan under ESSA. The apportionment method would be inconsistent with Federal law.

Summary of Comment	MDE Response
I am most concerned about the Performance Classifications and the use of percentile rankings. The percentiles proposed for permanent use in the accountability model were adopted based on the score distribution of a model that has kept changing over the past 2-3 years. There should be NO limit to the number of schools/districts that can earn an A (or F) rating.	Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year and it does not establish a limit to each performance classification.
I do not feel that any of the proposed changes should be applied to the accountability results for this school year (2018-19).	The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.
There is a recommendation to change Rule 1.1.1 to add "When performance classification cut- points are established, the following percentiles shall apply." How often will this occur?	Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year.
(Section 9) The proposed changes do not give a fair playing ground for all schools, especially rural ones like ours. Our district cannot afford, nor will it be able to offer both AP classes. There is not logical rational for weighting one over the other. My recommendation is that IB be removed from all of the sections in Rule 9, especially since only a few schools/districts are currently using it.	The proposed changes to the Acceleration component address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
(Section 15) The new suggested rule could be problematic for schools without an EL subgroup.	Proposed changes to the methodology regarding how the EL component impacts the composite score is in response to feedback from schools and districts regarding the concern that having an EL component may only negatively impact the composite score. The proposed change makes the component consistent with other components in the model and allows for impact to be responsive to relative performance on other indicators. This change does not necessarily favor schools/districts with an EL component or without the component.
Clarifying language that does not change the rules for the current year is understandable and acceptable, but changing the calculation of points for anything is illogical as we have spent the past ten months preparing with this set of rules.	The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.
Section 9.2.1 – delete ALL changes and leave as it was	
Sections 9.9 and 9.10 - delete	

Summary of Comment	MDE Response
The recommended changes to Section 9 and Section 25 of the Mississippi Accountability Business Rules are needed and I am in support	
It is frustrating for professional educators and parents when the accountability system changes at this point in the year. We should not be forever moving the target and changing the game.	The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.
I object to the decision to use specific percentiles from a single historical moment, namely 2016. Basing today's accountability standards - which are being applied after the administration of a different set of assessments - on the single administration of a set of assessments which have changed is not in keeping with sound educational practice.	Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year. Standard-setting was conducted in the initial year (2016) of the current assessment (MAAP).
(Section 9) Acceleration Language in 9.9 disproportionately disadvantages low-wealth districts.	The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
in support of the Accountability Model change (9.10)(9.9)	, V
We strongly support the changes in the business rules of the Mississippi Statewide Accountability System addressing acceleration.	
These two components of our academic program illustrate true acceleration in academics. Both require rigorous college-level instruction, and both require the passing of a rigorous national/international assessment in order to receive the college credit. Therefore, these two programs should factor more heavily in the acceleration piece of the accountability model.	

Summary of Comment	MDE Response
We are in strong support of the changes in the business rules of the Mississippi Statewide Accountability System addressing acceleration.	
These two components of our academic program illustrate true acceleration in academics. Both require rigorous college-level instruction, and both require the passing of a rigorous national/international assessment in order to receive the college credit. They also require many more seat hours for credit. Therefore, these two programs should factor more heavily in the acceleration piece of the accountability model.	
My first concern is regarding the acceleration component. Although I think it is beneficial to encourage schools and districts to promote acceleration. I feel that the current method causes undue to discrimination to lower income districts and students.	The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
My other concern is regarding ELL component. I understand this is a federal mandate. However, it places unfair weight on only those schools that have an ELL population. There should be some way of equalizing the weight put on those schools vs. schools that do not have an ELL population.	Proposed changes to the methodology regarding how the EL component impacts the composite score is in response to feedback from schools and districts regarding the concern that having an EL component may only negatively impact the composite score. The proposed change makes the component consistent with other components in the model and allows for impact to be responsive to relative performance on other indicators. This change does not necessarily favor schools/districts with an EL component or without the component.

Summary of Comment

Generally, it is a concern that rule changes made at the end of a school year, when it is too late for educators to adjust their systems to benefit from the changes, would be used to calculate school and district accountability ratings for that school year.

This practice of imposing artificial limits on ratings categories contradicts the Board's stated goal of moving all schools and districts to a rating of C or higher. Our accountability system should allow the actual performance of schools and districts to be reflected in a fair classification unrestrained by arbitrary boundaries.

(Section 1.7)

... agrees with the changes made to this section of the business rules and believes that it will reflect more accurately the performance of students and teachers in schools with both elementary and/or middle school and high school grades.

(Section 9)

We have a continued concern with the acceleration component of the accountability model because we believe the component disproportionately disadvantages low-wealth districts.

(Section 15.1)

The changes made to the business rules that apply to English Learners (EL) are an improvement, though areas of concern remain. Inclusion of this component still will create significant disparities in the expectations for districts that have substantial EL populations versus those that do not.

MDE Response

The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.

Proposed changes to Section 1 incorporate current board policy into business rules in order to provide clarification. This proposed change does not establish that these percentiles will apply each year. The MDE does not arbitrarily or "artificially" establish policy and does not limit the number of certain performance classification assignments. Although it should be noted that Miss. Code Ann. §37-17-6 does establish that standards will be increased when 65% or more of schools and/or districts are earning a grade of "B" or higher.

The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.

Federal provisions require the inclusion of an English Learner component. Proposed changes to Section 15 are in direct response to feedback from schools and districts and will have a positive impact over the methodology used last year. The MDE is committed to continue working with other states and the Council of Chief State School Officers (CCSSO) regarding the review and revision of this component.

Summary of Comment	MDE Response
Let me start by stating that none of the proposed changes should be applied to the accountability results for this school year (2018-19).	The changes proposed do not have a negative impact on accountability scores or ratings for the current year. Changes to Business Rule 9.2, which may impact course planning, are delayed until the 2019-2020 school year to allow for any changes that a district may want to consider.
(Section 9) The changes that are being recommended in this section create an inequitable playing field for schools across the state. Not all school districts in the state can pay for the AP tests and neither can the students in those districts.	The MDE recognizes the challenges that districts face with inequities in resources. The proposed changes to the Acceleration component do not attempt to address these challenges, rather it is to address the inequity in the performance requirement between more rigorous courses, such as AP, IB, and industry certifications verses dual credit. For example, in 2018, 32% of students taking the AP exam received a successful score of 3, while 97% of students taking dual credit courses received a "C" or higher grade.
(Section 15) The previous recommendation had punitive repercussions for those schools/districts which met an N count for EL. Now the new recommendation has been adjusted to an advantage for those schools which meet the requirements for an EL component- now making it punitive for schools without an EL subgroup.	Proposed changes to the methodology regarding how the EL component impacts the composite score is in response to feedback from schools and districts regarding the concern that having an EL component may only negatively impact the composite score. The proposed change makes the component consistent with other components in the model and allows for impact to be responsive to relative performance on other indicators. This change does not necessarily favor schools/districts with an EL component or without the component.
(Section 1.7) Currently we are assessed grades 7-12 on the 1000 point system. A more accurate assessment would be to have the middle school assessed on the 700 point system, the same as the traditional 700 point school s and the high school assessed on the 1000 point system, the same as the other 9-12 high schools.	

Summary of Comment	MDE Response
I would like to share my feedback concerning dual credit/enrollment and the acceleration component. At times, students are being placed into college-level coursework without meeting the entrance/admissions standards that traditional students face. This creates unequal opportunities across the board.	
Because schools receive points for course completion based on students' earning an A, B, or C in the accelerated coursework, the involved instructors (generally either the high school teacher and/or an adjunct) feel compelled to pass students at the C level or above.	
(Section 1.7) It is my belief that being able to score the middle grades on the same system as traditional 700 point will provide a more accurate picture for our school and our community of our level of performance.	
(Section 1.7) We believe that the middle school (7th & 8th in our case) point score of 700 and the high school (9th -12th grade in our case) point score of 1000 is a more accurate measurement of our school's performance level.	
(Section 9) My comments are in support of the proposed changes to 9.2, 9.2.1, and 9.2.2. From the perspective of a community college administrator and dual credit host institution, these changes have the potential to level out some of the inequality and inconsistency that has accompanied the recent surge in dual credit enrollment.	
(Section 1.7) It is my sincere hope that the Board will consider changes to the accountability classification system recognizing that not all high schools are of the same configuration.	
(Section 9) I feel strongly that AP and dual credit should be given equal weight in the accountability model.	
(Section 9) I strongly support the proposed changes for the Accountability Model, especially the proposed changes for campuses with 12th grade and grades below 9th grade.	

Summary of Comment	MDE Response
The recommended changes to Section 9 and Section 25 of the Mississippi Accountability Business Rules are needed and I am in support.	
(Section 15)	
I am writing to express support for the revisions to Section 15.	
(Section 15.2.2)	
The reallocation method vs. the subtraction method is actually just	
common sense.	
(Section 15.4.3)	
Must be discontinued as is recommended.	
I am writing in support of the recommended changes for Section 9,	
Section 15 and Section 25 of the Mississippi Accountability	
Business Rules	
(94:0)	
(Section 9)	
Performance credit for the areas that have a normed test typically have around a 30% pass rate on average while Dual Credit courses	
typically have around a 90% pass rate.	
typically have around a 50% pass rate.	
(Section 9.10)	
Will allow students the ability to count for a school for a course	
where they should count vs. now where they are not able to.	
(Section 15.2.2)	
The reallocation method vs. the subtraction method is actually just	
common sense.	
(Section 15.4.3)	
Must be discontinued as is recommended.	
(Section 25.7)	
We were treating seniors unfairly by not allowing their last ACT	
scores to count. This only makes sense to change this.	
(Section 15)	
I am writing to express support for the recommended changes for	
Section 15.	

Summary of Comment	MDE Response
(Section 15)	
I am writing to express support for the recommended changes for Section 15.	
I am writing to express support for the recommended changes for Section 9, Section 15 and Section 25.	

Dear Mr. Burrow:

As a concerned citizen and supporter of public education, I am in agreement with the proposed revisions to the business rules of the Mississippi Statewide Accountability System as outlined by the Parents' Campaign.

I agree that public school children, their parents and our state are best served by an accountability system "that reflects high standards and that provides a fair and accurate measure of the quality of education being provided in Mississippi's public schools."

Thanks very much for your consideration of the proposed changes.

Sincerely,

Erle E. "Bubby" Johnston 603 Betty Circle Quitman, MS 39355 April 30, 2019

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 rule of the MS Statewide Accountability System

Dear Mr. Burrow,

I would like to take this opportunity to thank you, the State Board of Education, and the Accountability Task Force for the tedious work that has been done this year regarding these proposed revisions to the accountability rules. I believe the consideration and professionalism demonstrated by each person on the Task Force has brought about discussion that was aimed at improving the Accountability System for all schools. Please consider the following comments:

1.	Assignment of Performance Classification for Nontraditional High School Configurations (Section 1.7):	I SUPPORT THESE CHANGES.	These changes are needed and directly affect our school district. They are positive changes allowing each student's score to count without regard for the school configuration.
2.	Acceleration (Section 9):	I SUPPORT THESE CHANGES.	This change supports schools in making decisions regarding course offerings that best meet the goals of each student.
3.	English Learners (EL) (Section 15):	I SUPPORT THESE CHANGES.	These changes are needed. This allows every school regardless of their school demographics to receive credit for student performance.

The conscientious work to improve our accountability grading system performed by the State Board of Education, the accountability department, and the task force is greatly appreciated. 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 Good afternoon,

I am writing to provide comments on the changes to the Performance Standards.

First, it seems that changing targets at this late date in the school year is unfair to school districts, who have been working all year towards the targets with which they were familiar.

Second, arbitrarily deciding ahead of time the percentage of F schools and so forth does not allow each school district the same chance to attain a high ranking. Instead of being compared to its own previous performance, each school is compared with and competes against the others, and, under these percentiles, we already know how many will be labeled as "failing." Why should there automatically be more schools labeled as A then F? (1.1.1.)

Privileging the performance of districts that can afford opportunities such as dual enrollment and AP offerings over districts with fewer resources will only lead to more stratification of school districts in the state, where schools with fewer resources will continue to be ranked lower and lower, simply because they don't have the support for these extra categories. (9.5)

Strengthening public education in Mississippi requires allowing for more improvement, rather than dooming a predetermined number of schools to fail. Thank you for considering my comments.

Sincerely,

Dr. Laurel Abreu

Hattiesburg, MS

- Requiring the use of established percentiles when cut-points are reset. Most of this is good, however, we should add that a school/district should not be dropped a letter grade because they did not fit a certain percentile if the school performed as well as they did the year before.
- Acceleration component. I disagree with weighing some areas more than others. It seems to favor a small number of districts. Districts have the option to choose what they offer. The proposed way seems to prioritize some courses/tests even though they should all weight the same.
- Inclusion of alternate diploma students in the calculation of graduation rate. This is really good.

Dr. Lundy Brantley

Superintendent

Neshoba County School District

Please accept the following feedback for the accountability model changes.

Our EL population is already accounted for in the current model in both overall proficiency and growth and again in the LPS growth component. We welcome the accountability for the district and for ALL of our students. The minority of districts in this state that have EL populations will be punished with this new proposed EL component. Please consider that districts impacted by this provision could receive bonus points or a cushion because of the inequity of the measure, instead of what is proposed. Please consider an attempt to keep things fair for everyone.

For as long as the business rules have been in place, Dual Credit and AP classes have been considered equal courses in the model. Districts have spent time, money, energy and our resources on building these programs, training teachers and educating parents and students that these courses are considered EQUAL. What is the justification for now saying they are NOT equal? How will we explain to the same set of stakeholders this change and that someone thinks that AP weight should now be doubled? I'm assuming the initial decision for weighting these courses the same was backed by educational research? What changed in the research that supports this radical change? Please explain so that we might explain.

Rather than give double bonus weight to the elite, academically gifted students who are taking Advanced Placement, give the double bonus weight to those EL students who are facing the most challenges? At a minimum, weight the same. The way the model is proposed now gives every advantage to the elite student and the districts that have the finances to support the AP programming, and punishes the English Learner and the districts that are trying to meet their every need.

Thank you so much for your consideration.

Dr. Karen Norwood

Assistant Superintendent

Biloxi Public Schools

(228)374-1810 x134

Mr. Burroughs,

Thank you for your continued work on the accountability model. I only have a few concerns on the proposed changes. First, I am concerned on the change to the acceleration component. I disagree with the doubling of the AP weight. Currently, a student that takes a Dual credit course gets 1.0 point for the first semester, the second semester, the student gets 0.1 point. So, the total for the year is 1.1 point. Currently, a one year AP course yields 1 point at the end of the year. Therefore, it is currently pretty equitable. So, doubling this is going to now make it more advantageous to take AP courses. My first issue is that for many students, common sense says to take the college course where you know that you will receive college credit. AP is not always accepted at all colleges, even in Mississippi. This almost seems like a move to push more students into AP. If our goal is to make students college ready, it seems that completing a college course is just as good as completing an AP course. Therefore, I would ask that we not make this change.

Thanks,

Raymond C. Morgigno, Ph.D.

Superintendent, Pearl Public School District

(601) 932-7916



LAWRENCE COUNTY SCHOOL DISTRICT

TAMMY G. FAIRBURN
SUPERINTENDENT OF EDUCATION

346 THOMAS E. JOLLY DRIVE - MONTICELLO, MISSISSIPPI 39654-9301 Telephone 601-587-2506 • Fax 601-587-2221

April 30, 2019

To The Mississippi State Board of Education:

Please consider the comments/concerns listed below as they pertain to the Mississippi Statewide Accountability System: Business Rules.

Business Rule 9: Acceleration

Comment: There should not be changes to the acceleration component. The changes in the acceleration component create inequitable circumstances for high schools and district across the state. Dual credit classes provide college credits that can easily transfer to a post-secondary institutions and are more accessible to rural districts such as the Lawrence County School District. College credit for Advanced Placement courses are at the discretion of the post-secondary institution to use as content courses or as an electives. Not all school districts can fund AP tests and not all families/students can afford the tests. Additionally, not all districts in the state have teachers who are trained to teach AP courses.

Question: Why would the Mississippi Department of Education recommend choosing to weight one over the other and to change to only the use of an unweighted grade for dual credit classes?

Business Rule 15: English Learners (EL)

Comment: The current EL Business Rule has punitive repercussions for those schools/districts which meet an N count. According to Superintendent Wright, during her presentation at the Superintendent Regional Meeting in Jackson, the suggested changes to the EL Business Rule would be equitable for schools and school districts in the state. In my review of the Business Rule 15, I see no changes that will make the EL component equitable for all schools and districts.

Question: Have changes in Business Rule 15 been made to allow for a more equitable EL component for all schools and districts in the state?

Thank you for your time in reading my comments, and thank you for your commitment to serve the students in Mississippi.

Sincerely,

Tammy Fairburn, Superintendent Lawrence County School District



Superintendent of Education Bobby Jones

Deputy Superintendent Tyrone Marshall

Wayne County School District

Preparing Tomorrow's Leaders Today

810 Chickasawhay Street Waynesboro, MS 39367 Phone: (601) 735-4871 · Fax: (601) 735-4872



Amy Brown, District 1 Wilma Taylor, District 2 George Alsworth, District 3 Al Smith, District 4 Robert Dean, District 5

> Board Attorney Marcus Evans

http://www.wayne.k12.ms.us

April 30, 2019

To Whom It May Concern:

I am writing to share my thoughts regarding the Mississippi Accountability System that is currently out for public comment. Please consider the following:

- Adjusting the EL n-count to 25 students, which is below the n-count of 30 students which is allowable by ESSA
- The current accountability model has a negative impact for schools that have an n-count of greater than 10. Please consider not penalizing schools that have an influx of EL students

Sincerely,

Tyrone Marshall

Assistant Superintendent

Wayne County School District



COLUMBIA SCHOOL DISTRICT

613 Wildcat Way Columbia, Mississippi 39429 Telephone: 601-736-2366

Fax: 601-736-2653

Jason Harris, Ph.D.
Superintendent
jharris@columbiaschools.org

April 30, 2019

To Whom It May Concern,

I am writing in regard to the proposed revisions to the business rules of the Mississippi Statewide Accountability System that are currently out for public comment. Columbia School District would like to express our concerns with some of the proposed changes. At this point in the school year, no changes should occur in the previously established accountability system. It would be completely unfair to make such changes when the majority of the school year is complete. Specific concerns we have are as follows:

- 1. Further clarification needs to be given to the proposed change to Rule 1.1.1 "When performance classification cut-points are established, the following percentiles shall apply." How often will cut-points be established? Will they change every year?
- 2. Changes to the English Language component, Rule 15, should not punish or benefit any school district. We believe this change needs further investigation on the effect it will have on school districts. In the past, it was punitive for school districts which met the N count of ten, now it seems it may benefit those districts with an EL population, giving them an advantage over the districts which do not meet the N count. There must be a more equitable model. One step could be to increase the N count to a larger number, such as 30.
- 3. Changes to Rule 8.4, which address the graduation rate, are a great concern for our district. Our population can be very transient. By giving sole responsibility to the school in which the student attended the most is not fair. We have seniors who have attended 6+ schools during their high school years. We received them half way through their senior year, yet we would be held accountable for the entire high school academic experience? This is not a fair distribution of responsibility. The previous method holds all schools in which the student attended accountable.

Thank you for taking the time to read our concerns.

Sincerely,

Jason Q. Harris, Ph.D.

C. Joseph M. M. James

Superintendent



Yazoo County School District

94 Panther Drive Yazoo City, Mississippi 39194

662.746.4672; Fax: 662.746.9270 Dr. Ken Barron, Superintendent

April 26, 2019

To Whom It May Concern:

Please find this correspondence regarding the business rules out for public comment on the Statewide Accountability System. The first concern is that we are recommending changes to the system in April of the year, basically changing the playing field in the final quarter of the game. It creates an unfair environment for the districts throughout the state.

Second, continually changing the cut scores makes it more difficult for districts to be successful. The SBE's goals of all schools being rated a "C" or higher cannot be achieved if the scores are constantly reset as the result will always be a percentage in the "D" and "F" range.

On the acceleration component, there are multiple issues. First, if we are truly attempting to help students, we would encourage them to take courses that will improve their chances of success in the future. Placing a greater value on IB and AP courses put students and districts in a difficult position as the success rate on these models is not as high as for Dual Credit/Dual Enrollment. International Baccalaureate is only utilized in two-three school districts throughout the state, it is illogical for the SBE to make a rule specifically to benefit these two-three schools. It is my recommendation that the SBE reject all changes to Rule 9.

On Rule 15, the component addressing EL student success, the recommendation that we provide only ways for districts with EL students to gain slants the playing field against the schools that do not have an EL population.

I would request that we resubmit our ESSA plan with some adjustments.

- ➤ Rule 3.2 change the N-count from 10 to 30 which is allowed in ESSA without providing justification
- ➤ Rule 8.4 needs to return to the apportionment method accepted by the USDOE.

Finally for Rule 25 there needs to be some method to measure "Career" readiness as the term College and Career Readiness implies. As it stands at this point, we measure the "College" portion through measuring the ACT scores of the students in the schools, we have no measurement for the "Career" part. I would suggest we adopt the ACT Work Keys to measure this component.

Thank you for your time in reading my comments.

Ken Barron, Ed. D. Superintendent Yazoo County School District In section 15.4, last two sentences: "Any student who does not demonstrate progress will have a rate of zero (0). No student will receive a rate higher than one (1). I disagree with not allowing students to score greater than a 1." I believe that exceeding the calculated growth goal should have either a weight of 1.25 or be given 1.25 points. Something very similar is being applied to other areas of accountability, I believe it should be applied here as well. Students, schools, and districts need incentives and should be awarded points for growing beyond what was expected.

Sections 15.3 and 15.4.3 I agree with the proposed changes. Respectfully,
Dr. Melissa M DeAngelo
Director of English Language Education
Pascagoula-Gautier School District

Good afternoon,

I propose rule 9.2 and 9.9 should include and outline (ACT WorkKeys Career Readiness Exam) as a national certification in the acceleration component for a few reasons. First, funding is available to school districts via workforce investment boards for testing at no cost. Second, communities are able to attract more industries due to the number of students (emerging workforce) who possess the ACT WorkKeys certification. Third, ACT WorkKeys is a nationally recognized, portable certification students can use to obtain and/or be promoted in the workplace. Last, the Mississippi Economic Council also supports offering the WorkKeys assessment to all graduating seniors to attack more industries and businesses to our state.

School districts will be more likely to support CTE and career readiness efforts; stimulate economic development, and received acceleration points if the rule outlines the ACT WorkKeys national certification.

Thank you for your consideration,

SDF

Shirlaurence D. Fair

sfair@cmsd.k12.ms.us

Director of Career and Technical Education Carl Keen Career and Technical Education Center Clarksdale Municipal School District (1420) Office 662-627-8580 Direct 662-645-7778 Fax 662-627-8582 We would appreciate links being added when references are made to other supporting documents. We also need definitions along the way for important terms, such as, "state-defined alternate diploma." Thank you.

Gwen P. Reiber, Ed.D.
Director of Accountability, Student Information and Assessment
Vicksburg Warren School District

Please consider the following thoughts concerning the proposed changes to accountability. Neither the changes concerning additional weight for advanced placement nor I.B. should be considered for this school year, if ever. To implement these changes this year would be to change the rules at the "end of the game". These type changes should only be implemented at the beginning of an accountability year whereby all schools could schedule accordingly thereby creating an equal opportunity for districts to achieve additional points. Further I believe we should not be adding additional weight to either advanced placement not I.B. for the following reasons. Advanced placement opportunity depends on several factors such as ability to pay for the test, availability of A.P. qualified teachers, proximity or availability of college teachers to facilitate the courses. International Baccalaureate is unique in that only two or three districts in the entire state of Mississippi offer it and thus they will be the only districts with an opportunity to achieve these additional points if this is implemented now.

The fact that our accountability model cut scores are based on percentages presents another issue when considering adding weight to A.P. and I. B. It is my belief that high performing schools would benefit most from the changes thereby causing them to earn more points. It logically follows that these higher point totals will cause the percentage based cut scores to be set even higher and subsequently making it more difficult for other schools to maintain their current rating or to achieve a higher rating . I realize that some would argue that the cut scores are not based on percentages but history proves otherwise .

I do agree with the recommendations to adjust the model for unique grade configurations such as k-12 due to the fact that our model does not accurately reflect a true comparison of schools as it currently stands . It has been demonstrated that some schools would rate higher if broken up into different grade bands for example k through k and k through k rather than k 12 attendance centers . It is therefore obvious that the system as currently structured does not in any way present a true comparison of schools if grade configuration alone can change the rating achieved. Please note that this change has been proposed and studied for multiple years previous and is a good example of how change to the system should come about . It is also my belief that this change disadvantages no school and puts all on an equal playing field .

Thank you for considering my thoughts Warren Woodrow
Superintendent of Education
West Jasper School District
MDE

I do not believe that section 9.9 should give more or less credit to one accelerated credit over another. I believe the subjective and selective nature of this decision will create more inequity in an already flawed system. The ability to provide AP,IB,AICE or industry certifications are very much dependent on wealth of a district and possibly more importantly the wealth of individual students and their families.

With this being said, the very nature of the acceleration component has in effect changed the primary function of public schools. We have been forced to assume the role of an institution of higher learning. This shift has put K12 and IHL in a competitive position and caused a clear split in the collaborative relationship that we have had in past years.

Realizing that we are in changing times and roles do change we have embraced the expectation of being leaders in innovation and expanding roles. I do not feel as though we should create more disparity than already exist among our student's opportunities or district's opportunity by imposing elitist loopholes in our accreditation model. If you need quantitative evidence of the financial problems this will cause simply look at the change in what dual credit cost the districts and students since the colleges and universities realized that it was in effect now mandatory and not voluntary on our part.

Sincerly

Dennis E. Penton
Superintendent
North Pike School District



Forrest County Agricultural High School

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Donna H. Boone, Ph.D. Superintendent

Charles B. Johnson Principal

April 30, 2019

To Whom It May Concern:

I am writing to share my concerns regarding the revisions to the business rules of the Mississippi Statewide Accountability System while they are currently out for public comment. Let me start by stating that ANY proposed changes should be NOT be applied to the accountability results for this school year (2018-19). It is unfair to change the rules after the game has been played. Our school year will be over in a month, and we cannot make adjustments to schedules or the like since the year will quickly see its end. Please see my comments below.

The recommendation to change Rule 1.1.1 to add "When performance classification cut-points are established, the following percentiles shall apply," needs further clarification. How often will these be established? Each time the percentile are set, the SBE cannot meet its goal of all schools being rated a C or higher because schools are being forced into one of five categories. The reality is that cut-points could be established each year. This rule needs further clarification.

The recommendation for changes to Rule 9 addresses the acceleration component. My suggestion is that all changes in this section be rejected. The changes that are being recommended in this section create an inequitable playing field for schools across the state. Dual credit classes provide college credits that can easily transfer to a post-secondary institution as the course was intended. Advanced Placement credits, while can be college credit bearing, are at the discretion of the post-secondary institution to use as a content course or as an elective. Not all school districts in the state can pay for the AP tests and neither can the students afford the cost. Nor do all districts have teachers who have the AP certification to teach these classes. Districts can utilize the local community college to teach dual enrollment classes. Why would the Mississippi Department of Education recommend choosing to weight one of the acceleration components over the other and to change to only the use of an unweighted grade for dual credit classes which is again a penalty to those schools who either have a small number of AP offerings or none at all but do have dual credit offerings?

Based on my research, only two or three districts in the state offer the International Baccalaureate (IB) program. My recommendation is that IB be removed from all of the sections in Rule 9 until at some

point in the future when it has a larger implementation across the state. Why would the State Board of Education pass a rule which would only apply to less than five districts in the state? Isn't that one of the reasons why the Cambridge Program was not accepted? Advanced Placement and International Baccalaureate are not the same type of program. Advanced Placement was designed to assist students in preparing for college while International Baccalaureate is an international (Switzerland) diploma to create critical thinkers who are also encouraged through curricular exposure to also be caring individuals. The addition of Rule 9.10 is for IB and is not needed. So again, I hope that you will reject all changes to Rule 9 and remove all references to IB.

The English Learner (EL) component, Rule 15, has been on the forefront now for the past year. The previous recommendation had punitive repercussions for those schools/districts which met an N count (10) for EL. Now the new recommendation has been adjusted to an advantage for those schools which meet the requirements for an EL component- now making it less advantageous for schools without an EL subgroup. My suggestion is that MDE look at what other states have included in their models which creates a more equitable model for those schools/districts with EL and those without.

I would like to respectfully request that our state ESSA plan be resubmitted to make a few adjustments. Rule 3.2 uses 10 as an N count. ESSA allows for an N count to be as high as 30 without justification. I would suggest that we change our N count to 25 which is equivalent to a normal class size. Rule 8.4 addresses the calculation of graduation rate. We need to go back to the apportionment method that we used previously which was always approved by the USDOE. Our previous method holds all schools which taught the student proportionately accountable for a student's graduation.

The Mississippi Statewide Accountability Model refers to a College- and Career- Readiness Indicator. Rule 25 pertains to that portion of the model. Currently, it is not a college- and career – readiness indicator, but rather a college-ready indicator. We continue to ask that we include ACT WorkKeys in this component of the model. It would be of great benefit to the students across the state if as part of your legislative agenda next year you would request funding for ACT WorkKeys for all juniors or seniors. Many communities are working to become certified as a Work Ready Community and allowing students to receive certification through ACT WorkKeys would assist in the support of workforce development. This one addition would move this indicator to be truly what its name implies – college- and career-ready.

Thank you for your time in reading my comments, and thank you for your commitment to serve the students in Mississippi.

Sincerely,

Donna H. Boone, Ph.D.

Donna H. Borne

Superintendent

Dear Mr. Burrow,

I am a parent of two children at JPS and would like to provide the following comments regarding revisions to the MS Statewide Accountability System.

I am most concerned about the Performance Classifications and the use of percentile rankings. The percentiles proposed for permanent use in the accountability model were adopted based on the score distribution of a model that has kept changing over the past 2-3 years. There should be NO limit to the number of schools/districts that can earn an A (or F) rating. If cut scores must be reset, then MDE should use a standards-based system for determining the baseline score.

Parents, teachers, and administrators are enormously frustrated by this constantly-changing model. It is not in the best interests of students or teachers to be chasing a moving target. This creates frustration and hardship for all. Furthermore, I am concerned about changing rules at the end of a school year.

Thank you for your consideration.

Sincerely, Joy Parikh April 29, 2019

To Whom It May Concern:

Please find enclosed my concerns regarding the business rules of the Mississippi Statewide Accountability System since the revisions are currently out for public comment. I do not feel that any of the proposed changes should be applied to the accountability results for this school year (2018-19).

There is a recommendation to change Rule 1.1.1 to add "When performance classification cut-points are established, the following percentiles shall apply." How often will this occur? Each time the percentile are set, the SBE cannot meet its goal of all schools being rated a C or higher because schools are being forced into one of five categories. Could this possibly be every year? I think there needs to be some clarification to this rule.

The recommendation for changes to Rule 9 addresses the acceleration component. My suggestion is that all changes in this section be rejected. The proposed changes do not give a fair playing ground for all schools, especially rural ones like ours. Our district cannot afford nor will it be able to offer both AP classes. There is not logical rational for weighting one over the other. Again, this creates an unfair advantage for larger school districts that can offer AP Courses.

My recommendation is that IB be removed from all of the sections in Rule 9, especially since only a few schools/districts are currently using it. The addition of Rule 9.10 is for IB and is not needed. So again, I hope that you will reject all changes to Rule 9 and remove all references to IB.

The English Learner (Rule 15) component has been on the forefront now for the past year. The new suggested rule could be problematic for schools without an EL subgroup. I suggest that MDE look at what other states have done in regards to inclusion of EL students in their accountability models. Rule 3.2 uses 10 as an N count. ESSA allows for an N count to be as high as 30 without justification. Why not resubmit the ESSA plan and change this rules.

Please consider the voices of all our districts in making your decisions to change aspects of our accountability model.

Sincerely,

Charles L. Breland, Superintendent Greene County School District

Thursday, April 18, 2019

To the State Board of Education President and members,

Thank you for this opportunity to respond to the item being considered, Rule 28.7 Districts of Innovation and Schools of Innovation. My name is Jason Spears. Currently, I serve as President of the Board of Trustees for the Columbus Municipal School District located in Columbus, Mississippi. In the CMSD, we live by the guiding principle "Every Decision Made in the Best Interest of Students". Our board, our superintendent, and all other stakeholders believe and unite under this doctrine. In the CMSD, students are provided opportunities to take dual credit courses from the Mississippi University for Women (Columbus) or East Mississippi Community College (Mayhew). Last year, three students graduated the CMSD with a High School Diploma and Associate Degree. Our enrollment, participation, and success in this effort have continued to grow. We expect the number of students graduating with both will continue multiplying every year going forward. This program is a large allocation within our budget to cover <u>all</u> costs associated with providing this opportunity to our students. However, we, the Columbus Municipal School Board and district leadership, know this is worth every penny of the investment.

Back in 2015, it was proposed to the CMSD, we join a consortium of schools to be part of a pilot program known as the Golden Triangle Early College High School (GTECHS). This opportunity would allow students considered at-risk who were rising high school freshmen, an opportunity to apply. They, if accepted to the program, would be bussed from the Columbus High School campus to the East Mississippi Community College campus at Mayhew for classes on path to earning a High School Diploma and Associate Degree. The selected students would complete all their high school years in this program. This May, GTECHS will graduate its first class. We are happy for our CHS students, who will be completing the program this year.

Recently, it was discovered the students' test scores and other related accountability information does not return to their home school. All scores and accountability data are credited to the Lowndes County School District even though students from the "feeder school districts" were responsible for students' education the previous eight years. The Columbus Municipal School Board, upon discovering this, unanimously approved a change to the MOU and sent it to MDE, EMCC, and LCSD. Essentially, we have been told, we are not going to allow the change. When students apply and are accepted to other State Special Schools such as Mississippi School for Math and Science (Columbus), School for the Deaf (Jackson), School for the Blind (Jackson), or the School of the Arts (Brookhaven), all testing and related accountability data is returned and credited to the student's home school.

Simply put, the pernicious enactment of these unfair rules would undermine the broader efforts of so many others. Why would the Columbus Municipals School District, Starkville Oktibbeha Consolidated School District, West Point Consolidated School District, and Noxubee County School District give up MAEP funds, expend additional dollars to transport students back and forth to Mayhew to the program and have the Mississippi Department of Education give all testing and related accountability data to the Lowndes County School District? Every district in this consortium are under the same pressure to move students and the districts to higher performing. Why would the precedent established with other successful programs within our State not be the same for this program? Why would MDE and this body consider creating this separate guideline and consider it to be equal?

We understand the effort it takes to bring about a long-lasting and impactful change for students. We, the Columbus Municipal School District have been providing public education to students of this State longer than any other. In 1821, Franklin Academy (which is still operating in our district to this day) opened and we have delivered a high-quality education to the children of our community every year since. We join with you in helping children achieve more. We join with you in making the educational system of Mississippi better. Our guiding principle "Every Decision Made in the Best Interest of Students" includes sending students and MAEP dollars to the GTECHS program. What it does not include is providing an opportunity for some students at the expense of the rest of the students of the Columbus Municipal School District.

In closing I propose the following solution and pose this question. In the summer of 2018, this body, the State Board of Education, voted to take over the Noxubee County School District. We realize this decision was not made in haste or taken lightly. The local board was dissolved, the superintendent removed, money had to be infused to cover operations, a new superintendent appointed, and a promise made to the students, staff, parents, and other stakeholders to return the school back to academic success and local control in the near future. A promise I know each member of this body intends to keep. My question is, how will you explain to the students, staff, and parents of the Noxubee County School District their district will be under conservatorship for a longer period because it was decided to give credit for the 20+ Noxubee County students' test scores, who attend GTECHS, to the Lowndes County School District? The precedent exists and has worked well for decades. Have the students' scores and other related accountability data returned to the home school of the student.

I thank you for your time and strong consideration of this request. I, along with the Board Presidents of the Starkville Oktibbeha Consolidated School District and West Point Consolidated School District, request you make the decision to return the students' scores and other accountability data to our respective districts. We, too, encourage you to do the same for the Noxubee County School District in your effort to return them to academic success. If you have additional questions, I will be in attendance of the May 9, 2019 meeting and be glad to answer them.

Forward to prosperity,

Jason D. Spears President Columbus Municipal School District Board of Trustees

Good Morning,

I am writing in regards to the English learners component of the model.

Although ESSA requires statewide entrance and exit procedures for English learners, requires reporting on English learners with disabilities, as well as reporting on the percentage of students who are long-term English learners, as measured by students who have maintained the classification for five or more years, AND requires that we build English proficiency rates into our accountability framework, it is our state that can determine to what extent we weight. this

Georgia has proposed 3% and 3.5% This will not cut as deeply for those districts serving EL populations in comparison to Mississippi's 5%. Why is Mississippi set on 5%? **DECREASE THE PERCENTAGE.**

Thank you for your consideration in helping to keep Mississippi moving in the right direction.

Respectfully, Kelleigh Reynolds Principal Biloxi Upper Elementary 1424 Father Ryan Avenue Biloxi, MS 39530 Phone: 228-432-3700

Fax: 228- 432-3715

Response to request for public comment on APA to revise the business rules:

The first concern lies with the adjustment occurring effective for the current school year. We started this year and are moving along preparing for the accountability rules and standards for this year and now we are proposing to make changes that will affect this year in April of said year. Clarifying language that does not change the rules for the current year is understandable and acceptable, but changing the calculation of points for anything is illogical as we have spent the past ten months preparing with this set of rules.

Section 3.1.1—Minimum number of valid test scores should be changed for all subgroups to 30. This is permitted under ESEA. Claims to the contrary are false. The minimum N-counts for all subgroups need to be set at 30.

Section 9.2.1—delete ALL changes and leave as it was

Section 9.4.3—the multiplier should be based on classes taken not based on the number of students who are taking classes. This penalizes districts who have smaller numbers of advanced students who can take more advanced classes, but the district has a lower number of students eligible to take the DC classes.

Sections 9.9 and 9.10—delete

Ken Barron, Ed. D.
Superintendent Yazoo County School District
Awesome, not average!
Dear Sirs and Madams:
Thank you for the opportunity to comment.

Τ

The recommended changes to Section 9 and Section 25 of the Mississippi Accountability Business Rules are needed and I am in support of the following.

A change to Rule 9.9 is necessary to make each high school's Acceleration calculation an accurate reflection of the corpus of knowledge and level of performance students attending that school achieve.

The completion of a course that culminates in a for-credit performance exam, such as Advanced Placement (AP) Subject Area Tests written by the College Board, is far more intellectually challenging than the completion of a dual enrollment Community College course. The two options are both needed but meet different student requirements.

AP exams, and thus the subject course leading to their successful completion, require students to reference a deeper knowledge base and to command a stronger performance skill than is needed to successfully complete a community college course earning the grade of "C" as a final grade. The work and skill involved in earning a Community College "C" and the work and skill involved in completing an AP course and then earning a "3" on the exam is disproportionate.

Well-meaning high school principals understand the Accountability business rules by which their schools are judged. These well-meaning principals are dropping AP courses to put more students into dual enrollment courses so their school and community will benefit from the highest Accountability score possible. Though both kinds of courses serve a purpose, they serve different purposes in the educational needs of high school students.

Dual enrollment courses give students a cost-effective way to earn college credits before taking on the cost of advanced study at a university. Dual enrollment gives students the confidence needed to know that they are college material. AP courses allow students to maximize their potential within a given subject.

Dual enrollment teachers must hold a master's degree in the subject area. AP teachers must hold a degree and be College Board certified within the field of study, being recertified every five years. This certification coursework assures that the pool of teachers providing AP instruction are up to date in their subject area and exposes the teachers to the best practices of instruction within the subject area throughout their careers. Even those students in an AP course who pass the class, but fail to earn a "3" on an exam, learn more than they would have learned in a dual enrollment course. AP courses are designed to prepare students to excel in the advance study required within a chosen field. In summary, a dual enrollment is an excellent way to get required courses out of the way before going to a university to deeply dive into a subject. An Advance Placement course is the deep dive.

By making this proposed change, the model will incentivize principals to encourage students to choose the AP or the dual enrollment course that will benefit the student the most. Ideally, students will take a combination of dual enrollment and AP courses, choosing the course that best suits their skills and interests. The course that best meets the student's personal requirements should be the course that provides the greatest benefit to school's Accountability score.

In addition, the Acceleration calculation within the Accountability Model today, fails to provide high schools with just compensation for ALL student achievement. Rather, the current Acceleration calculation pushes principals to assure equity of outcome across the student body as a whole while failing to reward principals who create an environment that encourages students to push themselves towards their potential. The current calculation awards high schools for a student's first "C" in a dual enrollment course or first "3" on an AP exam but devalues all other "Cs" or "3s" proportionally.

This lack of respect for high achievement across the curriculum encourages well-meaning principals to select one subject at which his or her school will excel and run all students through that subject. The current minuscule calculation incentive is too low for a principal to devote a portion of a teacher's day to a second or third course that would provide students with acceleration in other subjects. The current calculation rewards principals who mass produce a certain type of acceleration, regardless of student needs, dramatically outweighing the current incentive given to principals who provide course offerings based on student skills and needs.

If a principal selects English as the subject of choice for Dual Enrollment and AP courses then sends a large number of students through acceleration courses in that one subject, the scores will push up the school's participation and performance calculations. There are likely students in that high school who would strive to maximize their potential in biology, chemistry, and calculus in the hopes of eventually becoming a doctor. This one student, however, is mathematically less valuable to the school scoring well on five AP exams than five different students completing English through a community college dual enrollment course all earning "Cs."

The change to Rule 9.10 allows, or incentivizes, principals to offer courses (both AP and Dual Enrollment) that were unavailable during the baseline year. High schools that offer a new course should at least receive credit for student participation in that course. In the current Acceleration model, the student grades or student AP exam scores are not included within participation because of the baseline year omission, but are included within performance when a low score is earned. Currently student performance of a "D" or lower, or a "2" or less, in one of these courses hurts the high school's overall Accountability score when the scores of classmates who meet the higher standard cannot help the Accountability score. Ideally, principals and the high schools they lead should receive credit for participation and performance in new subject offered through dual enrollment or as an AP College Board course.

The change to Rule 25.7 allows the highest sub-score earned by a student on the ACT through April of the student's senior year to count towards the high school's Accountability score. This aligns with the calculation practices of Mississippi's universities. April tests, and final semester grades, when submitted by a student to a university, are accepted and included in the calculation of scholarship funds given to the student.

Respectfully, Emily Nelson Director of Leadership Development DeSoto County Schools.



Ocean Springs School District

2300 Government Street (39564) Post Office Box 7002 (39566-7002) Ocean Springs, Mississippi Phone (228) 875-7706 Bonita Coleman, Ph.D. Superintendent of Schools

April 11, 2019

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

Dear Mr. Burrow,

Please accept this letter in support of the Accountability Model change (9.10) that would clarify the participation and performance calculation for International Baccalaureate courses. As evidenced in my *attached letter* to Dr. Vanderford in November of 2017, this technical issue has actually unfairly penalized Ocean Springs High School for participating and excelling in a program of study that is internationally benchmarked.

In addition, we also support the additional weight that is proposed in business rule 9.9. Students who participate in nationally/internationally benchmarked coursework and successfully pass a qualifying exam should receive additional weight based on excelling at rates that are clearly exemplary.

Thank you for taking the steps necessary to remedy these two issues as we move forward together.

Bonita Coleman, PhD

Sincerely

Superintendent of Schools



Ocean Springs School District



2300 Government Spect (39864) Post Office Hox 7002 (39566-7002) Ocean Springs, Mississippi Phone (228) 875-7706

Bonka Coleman, Ph.D. Superintendent of vilos s

November 28, 2017

Paula A. Vanderford, Ph.D.
Office of Accountability
Mississippi Department of Education
Post Office Box 771
Jackson, MS 39205-0771

Re: Acceleration Model and International Baccalaureate Courses

Dear Dr. Vanderford:

Over the past two years, the Ocean Springs School District has worked diligently to fully understand and appreciate all facets of the Mississippi (MS) Accountability Standards. This work is cyclical and ongoing in our district and we are still reviewing the results of the 2016-2017 accountability results in an effort to build on our successes and address our challenges as it relates to student achievement. This letter is in reference to a noted issue with the Acceleration Component of the model.

Business Rule 9.3 of the MS Public School Accountability Standards. 2016 notes that 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 scale:

- Year 1 (2015-2016): (Participation-70%/Performance-30%) divided by 2
- Year 2 (2016-2017): (Participation-60%/ Performance-40%) divided by 2
- Year 3 (2017-2018) and beyond: (Participation-50%/ Performance-50%) divided by 2

This calculation assumes that each Advanced Placement (AP). International Baccalaureate (IB), Advance International Certification of Education or approved industry certification course has an accompanying assessment that certifies passing (see Business Rule 9.2). However, that is NOT the case for all International Baccalaureate courses. Specifically, the following courses require a two semester participation before the qualifying exam is administered.

- IB Biology Part I (Jr.) No test
- IB Biology Part 2 (Sr.) Test
- History of the Americas Part I (Jr.)- No test
- History of the Americas Part 2 (Sr.) Test
- IB English III No test
- IB English IV Test

In addition, TOK (IB Course) is taken during the senior year and has an internal assessment not an external assessment so there is no assessment. AP Seminar and AP Research also do not have

Dr. Paula Vanderford Page 2 November 28, 2017

external assessments; but, as a school district that now offers the AP Diploma these courses are required.

As you can see, the unintended consequence of this issue is that our district was penalized in the acceleration component on the performance side for our IB students who took classes that had NO accompanying examination until the second semester. Please address this matter in the revision of the business rules so that it will not continue to penalize our school for teaching the most rigorous coursework that can be offered at the high school level. I understand that you cannot retroactively address this matter; but, I look forward to a proactive response from MDE.

Sincerely

Bonita Coleman, Ph.D. Superintendent of Schools

BC/caj

Cc: Dr. Carey M. Wright. State Superintendent of Education

Mr. Roy Gill, Superintendent of Schools, Harrison County School District

A Standard for Excellence:

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

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

Mr. Burrow:

At Ocean Springs High School, we pride ourselves on achieving a balance of the three As: Athletics, Arts, and Academics allowing our students to become very well-rounded individuals ready for the next step. We are in strong support of the changes in the business rules of the Mississippi Statewide Accountability System addressing acceleration.

Over the last 12 years, we have increased our academic success by incorporating the International Baccalaureate Diploma Programme into our curriculum. Our students are performing on the same level and in many cases exceeding the international averages. Our IB students not only endure and grow through the rigorous instruction, but they must also score well on the end-of-course exam that is administered internationally.

In addition to creating our IB program, our school has increased the number of Advanced Placement courses offered to our students. Our participation in the courses as increased exponentially and our student success rate of earning a qualifying score of 3 or higher has gained national attention. We are also only of two high schools in the state to offer the AP Capstone program which requires intense research and writing.

These two components of our academic program illustrate true acceleration in academics. Both require rigorous college-level instruction, and both require the passing of a rigorous national/international assessment in order to receive the college credit. They also require many more seat hours for credit. Therefore, these two programs should factor more heavily in the acceleration piece of the accountability model.

We also have a strong dual credit program, and while these courses should be factored into the acceleration piece, there is no qualifying exam at the end of the course. Students will receive this credit as long as they pass the course.

Thank you in advance for providing this outlet to address the areas mentioned above. It truly takes a village to elevate this work.

Respectfully,

Vickie J. Tiblier, Ph.D Ocean Springs High School, Principal Dear Mr. Alan Burrow,

I would like to submit my comments regarding the accountability changes for consideration.

My first concern is regarding the acceleration component. Although I think it is beneficial to encourage schools and districts to promote acceleration. I feel that the current method causes undue to discrimination to lower income districts and students. Schools that do not have the opportunity to provide teacher trainings or retain teachers are at a disadvantage. Wealthier schools can provide a variety of AP courses and are able to attract teachers that have advanced degrees and can provide dual credit opportunities. Also, schools that fear a penalty for students not taking the AP tests out of lack of resources can discriminate against students in scheduling. In a meeting I attended a new teacher suggested that students who do not pay the AP exam fee upfront should not be allowed to take the class. It was explained that discriminatory exclusive practices based on financial ability are unfair and. However, it made me wonder how many students are shuffled into lesser classes behind closed doors because of this same mentality that it is not openly shared. This can also occur in wealthier districts where lower incoming students are cycled into less challenging classes due to the test score 'fear' of not scoring a 3 or above on an AP test.

My other concern is regarding ELL component. I understand this is a federal mandate. However it places unfair weight on only those schools that have an ELL population. There should be some way of equalizing the weight put on those schools vs. schools that do not have an ELL population. Also please consider that these tests for students in the high school put added weight to that student. For example a student who arrives in the country their 8th grade year with limited to know English will also probably end up taking Biology, Algebra and English II. My own experience has seen these same students counted in the lower 25%. Many times their language skills are still emerging but these students can be found in different categories of the accountability model. It is my understanding that schools with an n-count of more than ten ELLs have the ELL accountability category. That would mean that in a larger school testing 25 ELLs and 200 Biology students that the 25 ELL students would count an equal number of points as the entire biology testing population. This puts excessive pressure on a small group of students carrying a significant amount of the schools accountability points.

Thank you for your consideration of these comments

Christina Marquez Davidson carino516@yahoo.com



April 29, 2019

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 to the business rules of the Mississippi Statewide Accountability System.

Generally, it is a concern that rule changes made at the end of a school year, when it is too late for educators to adjust their systems to benefit from the changes, would be used to calculate school and district accountability ratings for that school year. This exacerbates the level of frustration educators have with a seemingly ever-changing model.

Section 1. Assignment of Performance Classifications

1.1.1 Application of percentiles following resetting of cut-points

The Parents' Campaign has spoken out against the use of percentile rankings since the practice first was proposed and adopted in 2016. The practical and policy considerations underlying our opposition have been detailed in previous public comments submitted to the State Board of Education. Since you now are proposing to establish the 2016 percentile rankings as a permanent feature of the accountability system, I again ask members of the Board and staff of the MDE to consider the following:

The use of percentile rankings, a practice that inflicts a failing rating on 14 percent of schools, regardless of how schools as a whole perform, undermines public confidence in our system of rating school performance. The structure of the process is inherently unjust, ensuring fewer schools and districts in the top category (10 percent A-rated) than in the bottom category (14 percent F-rated). Every time scores are reset, which has happened frequently in recent years, schools and districts are pushed – mostly downward – into fixed brackets. This practice of imposing artificial limits on ratings categories contradicts the Board's stated goal of moving all schools and districts to a rating of C or higher. Our accountability system should allow the actual performance of schools and districts to be reflected in a fair classification unrestrained by arbitrary boundaries.

Of particular concern is the adoption – and utilization in perpetuity – of the specific percentiles first implemented in 2016. The percentiles proposed for permanent use in the accountability model were adopted based on the score distribution related to an accountability model that has changed repeatedly since 2016. That score distribution was based, in large part, on scores obtained on one administration of state assessments, some of which have changed since the percentiles were established. To our knowledge, no effort has been made to determine whether or not the 2016 score distribution has merit for use with the current model and test cycle, and certainly not for those moving forward. It appears that the only justification for using the specific percentile cut points under consideration is, "This is the way we've been doing it." Interestingly, when adopted for use with the 2016 rankings, these percentiles were not intended to be used going forward, according to the MDE's own press release from September of 2016: "Once final data are approved by districts and verified by MDE, the numeric values for each grade will be set and they will not change. This way district leaders will always know the target needed to reach a particular grade. The target will not move," said Dr. Carey Wright, state superintendent of education. "As always, every decision we make is based on what is in the best interest of students, teachers and administrators. We know all schools and districts are committed to helping students achieve the highest possible goals. There is no limit to the number of schools and districts that can earn an 'A' or any other grade."

Recommendation: Any time cut scores must be reset, a fair and just standards-based system of determining baseline score targets for A-F ratings should be established.

1.7 Classifications for schools with grade configurations that include both 12th grade and grades below 9th grade

The Parents' Campaign agrees with the changes made to this section of the business rules and believes that it will reflect more accurately the performance of students and teachers in schools with both elementary and/or middle school and high school grades.

9.9 For students taking and passing accelerated courses in AP, IB, AICE, or industry certification that have a normed, end-of-course assessment, the numerator will be doubled in weight

We have a continued concern with the acceleration component of the accountability model because we believe the component **disproportionately disadvantages low-wealth districts**. Parents cannot afford the dual credit tuition, AP exam fees, etc., and school districts cannot afford to bear those costs. Likewise, not all school districts have teachers who have the capacity to teach AP classes, a problem made worse by the teacher shortage crisis, which we know affects some school districts more than others. Preferencing AP, IB, and AICE courses in the model skews accountability results in favor of wealthier school districts and creates the appearance that the accountability model is being manipulated to benefit specific school districts at the expense of others.

Page 3, Office of District and School Performance

Holding schools and districts increasingly accountable for extra programs without providing the resources for those programs creates an unfair system that benefits highwealth communities while harming low-wealth communities.

15.1 Scores of English learners, counted in participation calculation in first year, with growth added in second year and proficiency added in third year

The changes made to the business rules that apply to English Learners (EL) are an improvement, though areas of concern remain. Inclusion of this component still will create **significant disparities** in the expectations for districts that have substantial EL populations versus those that do not. The Parents' Campaign acknowledges that this is a federal requirement, and we encourage the MDE staff to continue to seek ways to make the accountability model fair and equitable for all students and teachers in all districts.

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 a fair and accurate measure of the quality of education being provided in Mississippi's public schools.

Thank you for considering these comments.

Regards,

Nancy Loome (

Executive Director

Cc. Dr. Jason Dean, Chair

Mr. Buddy Bailey, Vice-Chair

Mrs. Rosemary Aultman

Dr. Karen Elam

Mr. Johnny Franklin

Dr. John Kelly

Mr. Charles McClelland

Ms. Brittney Rye

Mr. Sean Suggs



Franklin County School District

41 First Street Meadville, Mississippi 39653 Phone 601-384-2340

Chris Kent, Superintendent

ckent@fcsd.k12.ms.us

April 26, 2019

To Whom it May Concern:

I am writing to share my concerns regarding the business rules of the Mississippi Statewide Accountability System since the revisions are currently out for public comment. Let me start by stating that none of the proposed changes should be applied to the accountability results for this school year (2018-19). It is unfair to change the rules after the game has been played. Our school year will be over in a month, and we cannot change anything that has already occurred.

There is a recommendation to change Rule 1.1.1 to add "When performance classification cut-points are established, the following percentiles shall apply." How often will this occur? Each time the percentile are set, the SBE cannot meet its goal of all schools being rated a C or higher because schools are being forced into one of five categories. Could this possibly be every year? I think there needs to be some clarification to this rule. As the rule stands now a district could perform higher than the previous year and receive a lower rating because the cut point could be moved to a higher level depending on how all other districts perform.

The recommendation for changes to Rule 9 addresses the acceleration component. My suggestion is that all changes in this section be rejected. The changes that are being recommended in this section create an inequitable playing field for schools across the state. Dual credit classes provide college credits that can easily transfer to a post-secondary institution. Advanced Placement credits, while can be college credit bearing, are at the discretion of the post-secondary institution to use as a content course or as an elective. Not all school districts in the state can pay for the AP tests and neither can the students in those districts. Nor do all districts have teachers who can teach these classes and could use the local community college to teach dual enrollment classes. Why would the Mississippi Department of Education recommend choosing to weight one over the other and to change to only the use of an unweighted grade for dual credit classes?

The English Learner (Rule 15) component has been on the forefront now for the past year. The previous recommendation had punitive repercussions for those schools/districts which met an N count for EL. Now the new recommendation has been adjusted to an advantage for those schools which meet the requirements for an EL component- now making it punitive for schools without an EL subgroup. My suggestion is that MDE look at what other states have included in their models which creates a more equitable model for those schools/districts with EL and those without.

I would like to respectfully request that our state ESSA plan be resubmitted to make a few adjustments. Rule 3.2 uses 10 as an N count. ESSA allows for an N count to be as high as 30 without justification. I would suggest that we change our N count to 25 which is equivalent to a normal class size. Rule 8.4 addresses the calculation of graduation rate. We need to go back to the apportionment method that we used previously which was always approved by the USDOE. Our previous method holds all schools which taught the student proportionately accountable for a student's graduation.

The Mississippi Statewide Accountability Model refers to a College- and Career- Readiness Indicator. Rule 25 pertains to that portion of the model. Currently, it is not a college- and career – readiness indicator, but rather a college-ready indicator. We continue to ask that we include ACT Work Keys in this component of the model. It would be of great benefit to the students across the state if as part of your legislative agenda next year if you would ask for funding for all seniors. Many communities are working to become certified as a Work Ready Community and allowing students to receive certification through ACT Work Keys would assist in the support of workforce development. This one addition would move this indicator to be truly what its name implies – college- and career- ready.

Thank you for your time in reading my comments, and thank you for your commitment to serve the students in Mississippi.

Sincerely,

Chris Kent
Superintendent of Education
Franklin County School District

Dear State Board of Education Members,

As an assistant principal working at a 7-12 school, it is my hope that the State Board of Education will reconsider the accountability system currently in place.

As educators we are always assessing our progress and welcome the opportunity to show growth in our students. However, we would like to request that the accountability model be a more accurate assessment of our progress. Currently we are assessed grades 7-12 on the 1000 point system. A more accurate assessment would be to have the middle school assessed on the 700 point system, the same as the traditional 700 point school s and the high school assessed on the 1000 point system, the same as the other 9-12 high schools. As educators we are always striving to provide that best educational opportunities for our students. We our very proud of our accomplishments and welcome the opportunity to show our community and stake holders our level of performance. We are asking that the accountability be a more accurate measurement of our progress.

Thank you for your continued support and all you do for our students.

Dr. Catherine Ladner 11th and 12th Grade South Jones High School 601-477-8451 To Whom It May Concern,

As the Mississippi Dept. of Education considers numerous changes, I would like to share my feedback concerning dual credit/enrollment and the acceleration component of the state-wide accountability model. As an English curriculum coordinator and department chairperson for Hinds Community College, the largest community college in the state, I have witnessed the harmful effects of having acceleration tied to accountability and public school ratings.

The most glaring problem I see with the accountability model is two-fold: (1) schools have the potential to gain higher accountability scores while (2) colleges have the potential to increase enrollment. Obviously, the model can lead (and has led in some areas) to an unhealthy co-dependency by which both levels benefit while students suffer. How? Students are now being placed too often into college-level courses despite their not having the appropriate academic skills for success. One would imagine that ACT scores would prevent such from occurring, but this is, overall, not true. At times, students are being placed into college-level coursework without meeting the entrance/admissions standards that traditional students face. This creates unequal opportunities across the board.

The co-dependency of public schools and colleges causes various issues depending on acceleration location. One is grade inflation--high final grades in the dual credit courses without acquiring/improving skills. Because schools receive points for course completion based on students' earning an A, B, or C in the accelerated coursework, the involved instructors (generally either the high school teacher and/or an adjunct) feel compelled to pass students at the C level or above. With mild investigation, the MS Dept. of Education will quickly find that, again in *some* locations, the quality of acceleration coursework is *not* equivalent to college-level standards/expectations.

As a final note, I will say that when schools with the lowest success rates on state tests are the ones who are providing the most acceleration opportunities, there is a true problem with the accountability system. Obviously, data can easily be tracked to prove that this is a true problem for the state-wide model.

Please consider that I do believe in the benefits of acceleration, particularly in dual credit, when the process is managed and is fair to all students, and we certainly do have schools that are doing a wonderful job in maintaining their integrity (and that of Hinds as well) regarding acceleration and accountability. Furthermore, I have four children; I want to see acceleration opportunities continue but with improvement. My oldest child is a high school freshman, and I look forward to her being able to participate in acceleration opportunities soon. Having said that, I want to know that her academic welfare is being protected by all involved parties.

Sincerely,
Melissa Buie
ENG/MFL Curriculum Coordinator
Hinds Community College
P.O. Box 1100
Raymond, MS 39154
601-857-3787

Re: Assignment of Performance Classification for Nontraditional High School Configurations (Section 1.7)

Dear State Board of Education,

As a middle school principal, I would like for you to consider changes to the accountability classification system. I would like to ensure that the letter-grade classification system that is assigned representing our school is a fair representation of the hard work and dedication shown by our students and staff. It is my belief that being able to score the middle grades on the same system as traditional 700 point will provide a more accurate picture for our school and our community of our level of performance.

Thank you for your consideration in this matter.

Sincerely,

Congetta Gieger

7th & 8th Grade Principal South Jones High School cwgieger@jones.k12.ms.us (601) 433-3950 1. Re: Assignment of Performance Classification for Nontraditional High School Configurations (Section 1.7)

Dear Honorable State Board of Education,

I am requesting the Board to consider the changes to the accountability classification system. The school that I am fortunate to be working at is a 7-12 school. We would simply like to request that the letter-grade classification system be a fair representation of the hard work and dedication of our students/staff. We believe that the middle school (7th & 8th in our case) point score of 700 and the high school (9th -12th grade in our case) point score of 1000 is a more accurate measurement of our school's performance level. We agree that there should be accountability within and of our school, but request that the accountability model be a more accurate depiction of our school's performance by breaking it up into middle and high school.

Thank you for taking the time to read this and for all that you do,

Sincerely,

Scott Tyson
9th & 10th Grade Principal
South Jones High School

Good afternoon,

My comments are in support of the proposed changes to 9.2, 9.2.1, and 9.2.2. From the perspective of a community college administrator and dual credit host institution, these changes have the potential to level out some of the inequality and inconsistency that has accompanied the recent surge in dual credit enrollment. The importance of acceleration scores is often the difference in school & district grades, and it is important to prevent manipulation of the educational system. I believe 9.2, 9.2.1, and 9.2.2 to be helpful in this regard, although I would urge that further attention is still needed to this component of the performance standards.

The change to 9.2 is a good step, but I would urge consideration for the potentially very different standards between these listed courses. While some of these courses (AP, etc...) culminate in a nationally-certified examination process, dual credit courses lack that component. It would seem that an acceleration formula that differentiates between these courses and weights those with national standards more heavily would be appropriate to consider for the future.

The change to 9.2.1—ensuring that only articulated courses are offered—is critical to pass. The mission of the community college is help students achieve their educational goals with efficiency and economy, and it is not advantageous for high school students and their families to believe that they are accumulating valuable college credits that will not count when the time comes to transfer. This change will protect the quality and integrity of course offerings and is a statement of good faith and partnership between community colleges and high schools.

Likewise, 9.2.2 is appropriate to ensure the integrity of dual credit grading. It does raise some operational issues about the efficiency of integrating two previously independent grade reporting systems, but promoting rigor and quality in dual credit is worth the effort.

Thank you for your time and consideration.

Ben Cloyd, Ph.D. Hinds Community College Academic Dean, Raymond & Nursing Allied Health 111 Jenkins Hall 601-857-3237 Re: Assignment of Performance Classification for Nontraditional High School Configurations (Section 1.7)

Dear Honorable State Board of Education,

It is my sincere hope that the Board will consider changes to the accountability classification system recognizing that not all high schools are of the same configuration. As a principal of a 7-12 school, we take student success very seriously in our community. We would simply like to ensure that the letter-grade classification system that is assigned representing our school is a fair representation of the hard work and dedication shown by our students and staff. It is my belief that being able to score the middle grades (in our case grades 7 and 8) on the same system as traditional 700 point schools and the high school grades (grades 9 through 12) on the traditional 1000 point scale will provide a more accurate picture for our school and our community of our level of performance. We do not mind accountability. As professional educators, we take the outcomes of our students very seriously. We have devoted our lives to student success; we would just like the measuring stick to accurately reflect the grades represented in our school.

Thank you for all that you do to support the education of our children.

Sincerely,

B.R. Jones, PhD Supervising Principal South Jones High School Good Morning.

To begin with, I feel strongly that AP and dual credit should be given equal weight in the accountability model. The new changes does not allow this.

9.9 For students taking and passing accelerated courses in AP, IB, AICE, or industry certification that have a normed, end-of-course assessment, the numerator will be doubled in weight.

As a parent, and educator, I have pushed my children to take dual credit. If they make the grade in the course, they get the credit.

The potential impact it will have on schools....

- 1. Students do not always take the AP exam for the credit. They are not required to take the exam. Therefore, this would affect our accountability rating.
- 2. Students may be successful in the AP course but may not be able to make a 3 on the exam.
- 3. The cost to ensure teachers are certified and remain certified to teach AP is very costly.
- 4. Larger districts can afford to have the staff to offer either or.....

Please consider these points from a parent and educator.

Thank you!

B. Jernigan Superintendent Nettleton School District

www.nettletonschools.com 662.963.2151 Good afternoon, As a representative of a district with two campuses that are currently 7-12 grade configuration, I strongly support the proposed changes for the Accountability Model, especially the proposed changes for campuses with 12th grade and grades below 9th grade.

Currently, the accountability model unfairly advantages high schools with just 9th-12th grades, as the same scale scores are not used across middle and high schools, and the rate of proficiency is significantly higher at the high schools, even with schools of similar student bodies. However, the proposed changes, which calculate an accountability score for 7th-8th grade, transposes it to a 1000 point school, and then uses a weighted average, are much

Please ensure the weighted average is based on students tested rather than enrollment, as in most cases, the number of students tested in the grades below 9th will be higher than those testing in 9-12th grade.

Thank you!

Landon Pollard Federal Programs Director Marshall County School District Dear Sirs and Madams:

Thank you for the opportunity to comment.

The recommended changes to Section 9 and Section 25 of the Mississippi Accountability Business Rules are needed and I am in support of the following.

A change to Rule 9.9 is necessary to make each high school's Acceleration calculation an accurate reflection of the corpus of knowledge and level of performance students attending that school achieve.

The completion of a course that culminates in a for-credit performance exam, such as Advanced Placement (AP) Subject Area Tests written by the College Board, is far more intellectually challenging than the completion of a dual enrollment Community College course. The two options are both needed but meet different student requirements.

AP exams, and thus the subject course leading to their successful completion, require students to reference a deeper knowledge base and to command a stronger performance skill than is needed to successfully complete a community college course earning the grade of "C" as a final grade. The work and skill involved in earning a Community College "C" and the work and skill involved in completing an AP course and then earning a "3" on the exam is disproportionate.

Well-meaning high school principals understand the Accountability business rules by which their schools are judged. These well-meaning principals are dropping AP courses to put more students into dual enrollment courses so their school and community will benefit from the highest Accountability score possible. Though both kinds of courses serve a purpose, they serve different purposes in the educational needs of high school students.

Dual enrollment courses give students a cost-effective way to earn college credits before taking on the cost of advanced study at a university. Dual enrollment gives students the confidence needed to know that they are college material. AP courses allow students to maximize their potential within a given subject.

Dual enrollment teachers must hold a master's degree in the subject area. AP teachers must hold a degree and be College Board certified within the field of study, being recertified every five years. This certification coursework assures that the pool of teachers providing AP instruction are up to date in their subject area and exposes the teachers to the best practices of instruction within the subject area throughout their careers. Even those students in an AP course who pass the class, but fail to earn a "3" on an exam, learn more than they would have learned in a dual enrollment course. AP courses are designed to prepare students to excel in the advance study required within a chosen field. In summary, a dual enrollment is an excellent way to get required courses out of the way before going to a university to deeply dive into a subject. An Advance Placement course is the deep dive.

By making this proposed change, the model will incentivize principals to encourage students to choose the AP or the dual enrollment course that will benefit the student the most. Ideally, students will take a combination of dual enrollment and AP courses, choosing the course that

best suits their skills and interests. The course that best meets the student's personal requirements should be the course that provides the greatest benefit to school's Accountability score.

In addition, the Acceleration calculation within the Accountability Model today, fails to provide high schools with just compensation for ALL student achievement. Rather, the current Acceleration calculation pushes principals to assure equity of outcome across the student body as a whole while failing to reward principals who create an environment that encourages students to push themselves towards their potential. The current calculation awards high schools for a student's first "C" in a dual enrollment course or first "3" on an AP exam but devalues all other "Cs" or "3s" proportionally.

This lack of respect for high achievement across the curriculum encourages well-meaning principals to select one subject at which his or her school will excel and run all students through that subject. The current minuscule calculation incentive is too low for a principal to devote a portion of a teacher's day to a second or third course that would provide students with acceleration in other subjects. The current calculation rewards principals who mass produce a certain type of acceleration, regardless of student needs, dramatically outweighing the current incentive given to principals who provide course offerings based on student skills and needs.

If a principal selects English as the subject of choice for Dual Enrollment and AP courses then sends a large number of students through acceleration courses in that one subject, the scores will push up the school's participation and performance calculations. There are likely students in that high school who would strive to maximize their potential in biology, chemistry, and calculus in the hopes of eventually becoming a doctor. This one student, however, is mathematically less valuable to the school scoring well on five AP exams than five different students completing English through a community college dual enrollment course all earning "Cs."

The change to Rule 9.10 allows, or incentivizes, principals to offer courses (both AP and Dual Enrollment) that were unavailable during the baseline year. High schools that offer a new course should at least receive credit for student participation in that course. In the current Acceleration model, the student grades or student AP exam scores are not included within participation because of the baseline year omission, but are included within performance when a low score is earned. Currently student performance of a "D" or lower, or a "2" or less, in one of these courses hurts the high school's overall Accountability score when the scores of classmates who meet the higher standard cannot help the Accountability score. Ideally, principals and the high schools they lead should receive credit for participation and performance in new subject offered through dual enrollment or as an AP College Board course.

The change to Rule 25.7 allows the highest sub-score earned by a student on the ACT through April of the student's senior year to count towards the high school's Accountability score. This aligns with the calculation practices of Mississippi's universities. April tests, and final semester grades, when submitted by a student to a university, are accepted and included in the calculation of scholarship funds given to the student.

Respectfully, Emily Nelson Director of Leadership Development DeSoto County Schools.

I am writing to express support for the revisions to Section 15 of the Mississippi Accountability Business Rules.

Section 15-EL:

Option 1 (Rule 15.2.2): The reallocation method vs. the subtraction method is actually just common sense. Simply taking away points at the end (subtraction method) is not done with any other Accountability category and completely has unintended consequences regarding EL students. It treats them very unfairly as they can only hurt a school's Accountability and cannot help a school's Accountability. The reallocation method (Option 1) allows EL students to help or hurt the school's Accountability depending on how the EL students do in relation to the other Accountability components. This is how every other Accountability component is measured and combined, as it should be. Option 2 (Rule 15.4.3) must be discontinued as is recommended. No other state has a "punishment" associated with achieving proficiency past five years for EL. Research on EL students as noted by several states in their ESSA plans says that it can take up to 7 years for EL students to achieve proficiency in the language (GA cites 4 different studies in their ESSA plan proving this). The USDE accepted these plans thereby acknowledging this fact.

Thank you, Rosie King Principal, Olive Branch Intermediate

Good Morning,

I am an Elementary School Principal and I am writing in support of the recommended changes for Section 9, Section 15 and Section 25 of the Mississippi Accountability Business Rules:

Section 9-Acceleration:

Rule 9.9 must be in place in order to ensure they are equal in is Acceleration. Performance credit for the areas that have a normed test typically have around a 30% pass rate on average while Dual Credit courses typically have around a 90% pass rate. Because of this, districts have to choose what is best for students vs. what is best for Accountability in some cases. This should never be the case. Accountability should always match what is best for some students. Because these tests are three times harder to achieve the Performance criteria for than Dual Credit, there should at least be double Performance weight.

Rule 9.10 will allow students the ability to count for a school for a course where they should count vs. now where they are not able to count since there was not a national test at the end of year 1. It is also crucial that they only count in the Participation side of Acceleration in this case as counting them in Performance actually hurts the school's Accountability since they would be unable to meet the Performance criteria without a test associated in year 1.

Section 15-EL:

Option 1 (Rule 15.2.2): The reallocation method vs. the subtraction method is actually just common sense. Simply taking away points at the end (subtraction method) is not done with any other Accountability category and completely has unintended consequences regarding EL students. It treats them very unfairly as they can only hurt a school's Accountability and cannot help a school's Accountability. The reallocation method (Option 1) allows EL students to help or hurt the school's Accountability depending on how the EL students do in relation to the other Accountability components. This is how every other Accountability component is measured and combined, as it should be. Option 2 (Rule 15.4.3) must be discontinued as is recommended. No other state has a "punishment" associated with achieving proficiency past five years for EL. Research on EL students as noted by several states in their ESSA plans says that it can take up to 7 years for EL students to achieve proficiency in the language (GA cites 4 different studies in their ESSA plan proving this). The USDE accepted these plans thereby acknowledging this fact.

Rule 15.3 must have the phrases that give high school graduation as an option for setting the student target taken out as recommended. The USDE guidance to States for the EL component on page 10 says that EL students in later grades are expected to make less progress than students in earlier grades. New EL students in high school must be given the same five-year timeline at the minimum or we are not following this and treating these EL students very unfairly.

Section 25-College/Career Readiness:

Rule 25.7 would allow seniors to have through the April ACT administration of their senior year to have their highest sub-score counted in Accountability. The school year does not end until May and Accountability is not calculated until the summer. We were treating seniors unfairly by not allowing their last ACT scores to count. This only makes sense to change this.

Thank you for your consideration.

Mrs. Lisa Nye

Lisa Nye

Principal

Desoto Central Elementary

"Knowing and Growing Students"

Good morning,

I am writing to express support for the recommended changes for Section 15 of the Mississippi Accountability Business Rules:

Section 15-EL:

- Option 1 (Rule 15.2.2): The reallocation method vs. the subtraction method makes much more sense. Simply taking away points at the end (subtraction method) is not done with any other Accountability category and completely has unintended consequences regarding EL students. It treats them very unfairly as they can only hurt a school's Accountability and cannot help a school's Accountability. The reallocation method (Option 1) allows EL students to help or hurt the school's Accountability depending on how the EL students do in relation to the other Accountability components. This is how every other Accountability component is measured and combined, as it should be.
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- Rule 15.3 must have the phrases that give high school graduation as an option for setting the student target taken out as recommended. The USDE guidance to States for the EL component on page 10 says that EL students in later grades are expected to make less progress than students in earlier grades. New EL students in high school must be given the same five-year timeline at the minimum or we are not following this and treating these EL students very unfairly.

Thank you,

Beth Turner, Ed.S. Principal, Olive Branch Middle School 662.895.4610

Good Evening,

I am writing to express support for the recommended changes for Section 15 of the Mississippi Accountability Business Rules:

Section 15-EL:

Option 1 (Rule 15.2.2): The reallocation method vs. the subtraction method is actually just common sense. Simply taking away points at the end (subtraction method) is not done with any other Accountability category and completely has unintended consequences regarding EL students. It treats them very unfairly as they can only hurt a school's Accountability and cannot help a school's Accountability. The reallocation method (Option 1) allows EL students to help or hurt the school's Accountability depending on how the EL students do in relation to the other Accountability components. This is how every other Accountability component is measured and combined, as it should be. Option 2 (Rule 15.4.3) must be discontinued as is recommended. No other state has a "punishment" associated with achieving proficiency past five years for EL. Research on EL students as noted by several states in their ESSA plans says that it can take up to 7 years for EL students to achieve proficiency in the language (GA cites 4 different studies in their ESSA plan proving this). The USDE accepted these plans thereby acknowledging this fact.

Back to the subtraction method. There is potential this method could cause school administrators to be apprehensive about enrolling EL students. There needs to be a system that encourages diversity not deter it!

Jerry W. Floate, Ed.D. Hernando Middle School Principal *Tigers to the Top!* Good afternoon, I am writing to express support for the recommended changes for Section 9, Section 15 and Section 25 of the Mississippi Accountability Business Rules:

Section 9-Acceleration:

Rule 9.9 is absolutely necessary to make things equal in Acceleration. Performance credit for the areas that have a normed test typically have around a 30% pass rate on average while Dual Credit courses typically have around a 90% pass rate. Because of this, districts have to choose what is best for students vs. what is best for Accountability in some cases. This should never be the case. This rule will help to correct this thereby allowing Accountability to match what is best for some students. Because these tests are three times harder to achieve the Performance criteria for than Dual Credit, there should at least be double Performance weight.

Rule 9.10 will allow students the ability to count for a school for a course where they should count vs. now where they are not able to count since there was not a national test at the end of year 1. It is also crucial that they only count in the Participation side of Acceleration in this case as counting them in Performance actually hurts the school's Accountability since they would be unable to meet the Performance criteria without a test associated in year 1.

Section 15-EL:

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Rule 15.3 must have the phrases that give high school graduation as an option for setting the student target taken out as recommended. The USDE guidance to States for the EL component on page 10 says that EL students in later grades are expected to make less progress than students in earlier grades. New EL students in high school must be given the same five-year timeline at the minimum or we are not following this and treating these EL students very unfairly.

Section 25-College/Career Readiness:

Rule 25.7 would allow seniors to have through the April ACT administration of their senior year to have their highest sub-score counted in Accountability. The school year does not end until May and Accountability is not calculated until the summer. We were treating seniors unfairly by not allowing their last ACT scores to count. This only makes sense to change this.

Thank you for your consideration.

Ryan Kuykendall, Director of Accountability & Research for DeSoto County Schools