

OFFICE OF CHIEF ACCOUNTABILITY OFFICER
Summary of State Board of Education Agenda Items
February 25, 2021

OFFICE OF DISTRICT AND SCHOOL PERFORMANCE

01. Action: Revise Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2020* specifically the business rules of the Mississippi Statewide Accountability System, Section 25, *College- and Career-Readiness*, regarding the inclusion of ACT WorkKeys in performance measures [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]
(Has cleared the Administrative Procedures Act process with public comments)

Background Information: Beginning in March 2020, the Accountability Task Force (ATF) began work to consider the inclusion of the ACT WorkKeys into the Mississippi Statewide Accountability System. In its most recent November 16, 2020 meeting a proposal to include a Silver National Career Readiness Certificate (NCRC) on ACT WorkKeys in conjunction with a recognized industry certification or career pathway as an indication of career readiness in the College- and Career-Readiness (CCR) component of the Mississippi Statewide Accountability System was presented. The ATF did not accept the proposal presented but approved a recommendation that the Silver NCRC be the sole indicator of career readiness. The MDE does not support the recommendation of the ATF, as it would significantly lower the standard of performance measure in the CCR component.

The Technical Advisory Committee (TAC) met on December 3, 2020 and reviewed the proposed changes to include ACT WorkKeys in the CCR component. The TAC confirmed that a Silver NCRC is not comparable to the existing measure of student success in the CCR component and therefore should not be used alone to indicate career readiness. The TAC agreed that an additional indicator, such as a recognized industry certification or career pathway, should be considered in the measure of student performance in conjunction with a Silver NCRC.

The Commission on School Accreditation (CSA) met on Thursday, December 10, 2020 and voted unanimously to recommend the State Board of Education begin the Administrative Procedures Act (APA) process to revise the business rules of the Mississippi Statewide Accountability System to include the ACT WorkKeys assessment in the measure of student performance as part of the College- and Career-Readiness component of the Mississippi Statewide Accountability System.

The State Board of Education (SBE) granted approval to begin the APA process on Thursday, December 17, 2020. APA comments were received and presented to the SBE on Thursday, January 21, 2021, at which time the SBE tabled the item until the February 18, 2021 board meeting for further discussion.

The public comment period was open through 5:00 p.m. January 14, 2021 with public comments received.

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

Summary of Administrative Procedures Act (APA) Comments

Approval to Revise Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2020 specifically the business rules of the Mississippi Statewide Accountability System, Section 25, College- and Career-Readiness, regarding the inclusion of ACT WorkKeys in performance measures

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2020 specifically the business rules of the Mississippi Statewide Accountability System, Section 25, College- and Career-Readiness, regarding the inclusion of ACT WorkKeys in performance measures.

Summary of Comment	MDE Response
<p>Hello, I read the MDE Communications concerning the WorkKeys. If I am comprehending this correctly, is this letter stating that an ACT Workkeys will be accepted in place of an ACT? I am currently enrolled at USM pursuing a bachelor’s degree in child and Family Science. I took the Workkeys on 7/31/07. The score results were: Math level 5 and Reading Level 4. Will this be acceptable? If not, Will I have to retake it? I've taken the ACT tests for the past few years trying to receive the 21, but was unsuccessful each time.</p>	<p>Off topic</p>
<p>The Union Public School District supports the use of ACT WorkKeys as an indicator of college and career readiness. However, we do think MDE/MS Legislature should consider funding the administration of the exam at least on a one-time basis as is applicable to the ACT. Also, teachers may need professional development to become more familiar with the content of the exam.</p>	<p>The MDE supports additional funding for the ACT WorkKeys assessment and professional development.</p>
<p>I am writing with concerns about including ACT WorkKeys in conjunction with industry certifications in the accountability model. In a school as small as mine, CTE courses are not highly sought after; in fact, only 17 students are on the NCCER roster--7 for carpentry and 10 for construction--which is the only CTE course we offer with an industry certification.</p> <p>Since our Mississippi curriculum standards are devoted to being college and career ready, a silver level on the ACT WorkKeys in itself would serve well as the criterion of workplace readiness, while the ACT would suffice as the benchmark for college readiness.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is</p>

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Summary of Comment	MDE Response
	<p>greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I disagree strongly, and urge MDE to consider the Accountability Task Force recommendation instead, and have the Silver level assessment or higher be included in the numerator for Math/Reading part of CCR instead of the ACT, and for students in the career field not be forced to deal with additional hurdles. To do so otherwise creates a two track and inherently unfair system.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I hope students are also allowed to share their ideas and opinion and on this subject matter.</p> <p>Sometimes high school can be very difficult and overwhelming. Future careers can seem daunting for young people. Some careers demand academic attention that need a certain foundation. Experience is always an asset, but it shouldn't take the place of a strong academic background. Just saying the word ACT Test can stir up confusion and fear. It would have helped me to get tutoring in the 9th grade throughout the 11th grade.</p>	<p>Off topic</p>

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<p>Some students take the ACT Test in the 9th, 10th, 11th, and 12th grade and then take the best score. The pivotal moment can be how long College Recruiters can wait to get scores notated for potential scholarships.</p> <p>I want to see students have options to work during the summers, this will count toward experience. If parents agree, maybe the first year can be spent working. Then a decision can be made regarding College.</p> <p>All students are not 4-year college candidates. Some students maybe 2 year college candidates. I did pretty well with the latter.</p> <p>Students may also want to be an Apprentice in Training, hands-on education and training with jobs guaranteed at graduation.</p> <p>Life is so good with you plan to succeed at the level that brings health, passion, volunteerism, and giving back to other students.</p> <p>Choices are good to embrace.</p>	
<p>I taught secondary and college English classes for over thirty years. I do not believe that students who are working toward vocational careers should all be required to have the same ACT requirements as students who are planning to go to college. I agree that the question are you going to require college bound students to build or rebuild a car points out the ridiculous nature of requiring a double standard for vocational students. The work keys standard should be enough. Different people have different skills and different types of intelligence. Everybody should not be required to take the same kinds of graduation assessments. The multiple choice testing that students have been forced to take for years have robbed the students of intellectual imitative. At least they did so for a long time as teachers were advised to make all tests and most practices like the state tests. At one point the state was discussing using portfolio assessment where teachers kept portfolios of student work and student-made projects to show what the students were able to do. They discussed training peer teachers to go to different districts to help evaluate portfolios and advise the teachers whose portfolios were being evaluated on what seemed to be working and how to improve perceived areas of weakness. Instead of simply seeking areas of weakness, such an approach would give students a chance to show what they are capable of doing and encourage them to have a sense of pride in their work.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a</p>

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	career-readiness pathway and graduates prepared for a career.
<p>I am a parent and an educator. I strongly support the Silver level score WorkKeys certification for an accountability model; however, I do not feel that it should be a standalone benchmark for success. I feel it would be discriminatory to require students in the career pathway to pass multiple tests, while the ACT is the only benchmark for academic success. I only one is necessary for academics, one should be adequate for the career pathway.</p>	<p>The MDE agrees that the ACT WorkKeys should not be a stand-alone measure of student success in the CCR component.</p>
<p>I hope this finds you well. My spouse, Amanda, and I (Jon) are writing to make a comment on the change being proposed to the Statewide Accountability Model. We agree with the stance of the Parents' Campaign, which is:</p> <p>"The Parents' Campaign supports the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model."</p> <p>As you are likely familiar, Ms. Loomer has written a letter that expresses a view we both also agree with. Here is a link to her letter: https://msparentscampaign.org/wp-content/uploads/2021/01/TPC-Public-Comments_WorkKeys-Addition-to-Acct-Model.pdf.</p> <p>Two additional comments were submitted with the same quotation and no other discerning information.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>While I strongly support the addition of WorkKeys to the CCR component, I have to oppose the Mississippi Department of Education's (MDE's) modification of the Accountability Task Force recommendation for measuring student success on the WorkKeys assessment.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing</p>

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<p>The Task Force recommended using the national industry standard Silver level score on the WorkKeys assessment as a stand-alone benchmark of success, just as the ACT national standard is being used as a stand-alone benchmark of success for college prep students. MDE has recommended that career track students be required to meet both the national industry standard Silver level score <i>and</i> an additional industry certification or career pathway in order to be counted as successful in the accountability model. Students on a college prep track are not required to have an additional certification, only the ACT benchmark score.</p> <p>I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p>	<p>measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am in favor of using only the Work Keys Silver as the rating for success in Career Readiness. As a community that is striving to be a Work Keys City our industries are adapting this measure as the standard for hiring. It only makes sense to use the same as an indicator of completion in our schools. I urge you to contact Joe Azar at the Panola Partnership for further industry input. We are really hard at work convincing our industrial partners to use ACT Works and our new training center The Concourse will need to align their training with the same standards.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry</p>

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	<p>certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>As a Principal of a large High School in Mississippi (Northwest Rankin High School), I agree with the Task Force recommendation to use the national industry standard Silver level score on the WorkKeys assessment as a stand-alone benchmark of success, just as the ACT national standard is being used as a stand alone benchmark of success for college prep students.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I support the addition of WorkKeys to the CCR component, but I oppose the MDE’s modification of the Accountability Task Force recommendation for student success on the WorkKeys assessment. The Task Force recommended using the national industry standard Silver level score on the WorkKeys assessment as a stand-alone benchmark of success, just as the ACT national standard is being used as a stand-alone benchmark of success for college prep students. MDE has recommended</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has</p>

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<p>that career track students be required to meet both the national industry standard Silver level score and an additional industry certification or career pathway in order to be counted as successful in the accountability model. Students on a college prep track are not required to have an additional certification, only the ACT benchmark score. I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p>	<p>shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am writing to express my concern about adding the WorkKeys career-readiness Indicator in addition to national certification exams already required for some second year CTE completers. I firmly support making the WorkKeys the SOLE indicator for accountability. The state of Mississippi has long over-tested our students and the addition of another test will, in my opinion, be counterproductive. The Perkins Act already holds my CTE programs accountable for our second-year completers scoring PROFICIENT on the Algebra 1, English 2, and Biology 1 state tests. Students are only required to PASS those tests to graduate. I realize the state of Mississippi cannot change this, but it is grossly unfair. Until those academic programs start teaching CTE curricula in their academic classroom, I will never understand this requirement.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance</p>

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	that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.
<p>I currently serve as the CTE Director for Pontotoc County School District. I am in my fourth year as director and 17th year in CTE altogether. I started WorkKeys testing at my center four years ago and have seen tremendous success. Many industries require silver or higher to be employed. I feel that we need to push for silver level or higher be included in accountability ratings. The industries that we work with, do not look at state tests for hiring purposes. If we are truly in this job to help students, then we will focus on WorkKeys and ACT.</p>	In support of change
<p>I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p> <p>One additional comment was submitted with identical language.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>

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<p>I am in favor of making ACT Workkeys Silver an indicator of CTE success. This a measure of Career readiness for students. College and Career Ready has no career ready component! This test helps encourage students to pursue two-year colleges and certificate programs with almost guaranteed employment. As a school counselor, I have seen first-hand it's success.</p> <p>Two additional comments were submitted with identical language.</p>	<p>In support of change</p>
<p>As a high school principal, I believe using the WorkKeys Silver Level Certificate as an indicator for College-and-Career Readiness for purposes of accountability is appropriate. However, for vocational students, I do not feel that placing this requirement on them in addition to obtaining industry certification is appropriate. Vocational students should not be required to successfully complete both of these certifications in order to be counted positively in the accountability model.</p> <p>I believe an "either/or" approach instead of a "both/and" should be used for vocational students obtaining Workkeys Silver Level and industry certification as it pertains to accountability.</p>	<p>The proposed change does not add an additional burden on students, rather it offers an alternative option to meeting the CCR requirement for in the accountability system. Students will still be counted as meeting the CCR requirement if they achieve ACT benchmarks in English or Reading and Math. The proposed change does not require participation in ACT WorkKeys.</p>
<p>I am writing to express my objection to the plan to reassign grades to districts. It is not fair to superintendents, principals, teachers, communities, and children who have been working faithfully and tirelessly to get off the “F” list. Please do not deliver another educational gut punch to our teachers, administrators, and students all over the state of Mississippi who already are fighting frustration, discouragement, anxiety, uncertainty and low morale due to the toll of these unprecedented changes.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of</p>

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	<p>success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>As a former public-school teacher, college dean and workforce training education the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p>	<p>(Note: The MDE is unsure of the commenter’s position. The comment was copied as written and appears to be incomplete.)</p>
<p>I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two-year CTE program with a grade of “C” or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve this opportunity.</p> <p>Two additional comments were submitted with identical language.</p>	<p>In support of change</p>
<p>We agree with adding ACT WorkKeys to the model but disagree with the additional qualifiers of industry certification and/or two year program completion which the Mississippi Department of Education is recommending for an ACT WorkKeys score to be included in the CCR component of Mississippi's Accountability Model. We urge you to adopt the recommendation of the Accountability Task Force which does not add the qualifiers of industry certification and/or two year program completion to the ACT WorkKeys score in order to be included in the CCR component of the accountability model. In order to serve all students and to include all students in the accountability model, we must shift from the mindset of "everyone has to go to college" to supporting that there are multiple options for all students</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of</p>

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	<p>success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them or are not counted in the Acceleration component of the Accountability Model. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, we do not believe national certifications should also be required along with the ACT WorkKeys. I would like to recommend adding the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.</p> <p>I would also like to request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program. For example, A Silver Level or above on the WorkKeys certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.</p>	<p>The MDE agrees that a Silver NCRC and the completion of a career pathway or completion of an industry certification should be an indicator of success; however, it should not be considered a higher level of success than meeting ACT benchmarks in English or Reading and Math.</p>
<p>#1 The Accountability Task Force recommended the silver score stand alone as a measure of career readiness on the Workkeys test. The task force did not recommend attaching any other items to the aforementioned score. While an industry certification is certainly a goal for students, not all paths have a certification that can be reached while in high school. Along these same lines, we may have students that choose an academic path that does not allow for CTE classes. Using Workkeys universally would allow both students and schools some flexibility with their choices.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the</p>

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Summary of Comment	MDE Response
<p>#2 The current proposed change could potentially cause an equity issue with many school districts. Access to CTE programs from district to district can vary widely. The Workkeys test itself is universal.</p> <p>#3 The sentence included in the press release states, “The Commission on School Accreditation on Dec. 10 approved unanimously a proposal from the Mississippi Department of Education to require a WorkKeys Silver level student performance and completion of an industry certification or pathway to ensure comparable rigor between ACT and ACT WorkKeys in the accountability model.”</p> <p>The inference here is Workkeys is not comparable with regard to rigor to the ACT. While I somewhat agree with that statement, I disagree with the way comparability is being <i>applied</i> in this particular case. The ACT is measuring college readiness, while Workkeys measures career readiness. We are comparing apples to oranges when attempting to parallel the “rigor” of both of these tests in this case. While making the argument that Workkeys is not as rigorous as the ACT academically, one could make a similar argument in reverse. Workkeys measures the likelihood of success in business in industry based on both hard and soft skills. The ACT is not built to measure these items. Ultimately, rigor comparisons are null and void when the desired testing outcomes are divergent.</p> <p>If our ultimate goal is to either send students into the work force or to the college of his or her choosing, both tests should hold equal weight without any other attachments and/or requirements.</p>	<p>CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p> <p>The MDE also agrees that the ACT and the ACT Workkeys measure different attributes, making a direct comparison difficult. This is one reason why the agency recommends additional considerations for student success other than just the Silver NCRC.</p>
<p>The Pearl River County School District disagrees with MDE's recommendation that requires a student meet the Silver benchmark on WorkKeys and successfully complete an industry certification or career pathway in order to be included in the CCR component. Instead, we agree with the recommendation from the Accountability Task Force to allow a score at the Silver benchmark or higher on WorkKeys assessment to be considered successful as a standalone metric and be included in the numerator for mathematics and/or English/reading components of the CCR in lieu of the ACT college prep benchmark requirement for the purposes the state accountability model.</p> <p>MDE's recommendation requires career track students meet more requirements than college prep students. In order for the CCR component of the accountability model to truly assess career readiness, a career readiness indicator must be used. WorkKeys is an effective indicator of</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on</p>

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Summary of Comment	MDE Response
<p>career readiness; however, career track students should not have to meet both the college prep benchmark and the career readiness benchmark. Students should be able meet career readiness benchmark without being required to meet the college prep benchmark. MDE's suggestion that career skills are inferior to college prep skills is unfair and damaging to our students and our education system in Mississippi.</p>	<p>simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am in full agreement with the attached letter submitted by Mrs. Kelly. Please consider giving CTE education some representation on our State accountability model.</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>The MASCTA Board of Directors strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. We believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p> <p>Eleven additional comments were submitted with identical language claiming various roles including “teacher”, “CTE Director”, “Principal”, and “Special Services Director”</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>I am writing this letter to show support for the recommendation of adding the ACT WorkKeys assessment along with completing a career pathway or acquiring an industry certification to the Mississippi Statewide Accountability System.</p>	<p>In support of change</p>
<p>I strongly believe that WorkKeys Silver, along with a successful completion of a two-year CTE program, would be a strong indicator of student success for career readiness in the accountability model.</p>	<p>In support of change</p>

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Summary of Comment	MDE Response
<p>I feel that it is better for the students and workforce that the students must make silver on the work keys and be a 2nd year completer of a CTE program. With the students having both it shows that they have the knowledge and skill set needed to help positively impact their futures and the workforce. With these two requirements, it will give the state's Accountability Model a true indication of how College and Career Ready the students truly are.</p>	<p>In support of change</p>
<p>Including the WorkKeys assessment in the accountability model is a great idea, but my opinion is that MDE should also require a 2-year high school career & technical course completion along with the Silver level of the WorkKeys assessment.</p>	<p>In support of change</p>
<p>The ACT WorkKeys test is based on industry standards and is further validation of the importance of career and technical education courses in the modern education system. The completion of these courses gives the students actual working knowledge that will be immediately useful on the job. Many students who don't do as well in traditional education classes excel in career and technical education. Whether it is from the more hands on approach or the various skills offered from career technical classes, many students are able to discover a true talent or interest which helps to encourage and motivate them in obtaining that high school diploma. Furthermore, they feel better prepared to pursue a career or college education. The ACT WorkKeys Silver is a significant indicator but no more so than the skills students learn through the completion of two-year CTE programs which make them truly competitive in today's job market.</p>	<p>In support of change</p>
<p>I am writing to express my hope that the Mississippi Board of Education will adopt the recommendation of the <u>Accountability Task Force</u> to modify the business rules to allow a score at the Silver level on the WorkKeys assessment to be considered successful as a stand-alone measure instead of the ACT college prep benchmark for purposes of the College- and Career-Readiness component of the State Accountability Model rather than the MDE's recommendation.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver</p>

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Summary of Comment	MDE Response
	<p>NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I believe that adding the ACT Work Keys test as a national assessment that measures foundational skills required for success in the workplace is a good idea.</p>	<p>In support of change</p>
<p>I am writing to share my comments with the State Board of Education regarding the addition of the WorkKeys assessment as an indicator in the College and Career Readiness (CCR) component of Mississippi’s State Accountability Model. We have reservations with the Mississippi Department of Education’s recommendation but support the Accountability Task Force proposal.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>

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Summary of Comment	MDE Response
<p>There are no additional qualifiers for the ACT, yet MDE staff's recommendation requires additional qualifiers of an industry certification or completion of a two-year career pathway for students who choose to enter the workforce rather than attend college when they finish high school. We should not place additional qualifiers on a group of students simply because they are headed to a career rather than to higher education, as doing so implies that career skills are not as important as college skills.</p> <p>MDE staffs' recommendation ignores the recommendation of practitioners and is reminiscent of the staff's efforts in 2019 and 2020 to continue the U.S. History assessment. Although the Student Testing Task Force and the Commission on School Accreditation recommended elimination of the assessment, MDE staff recommended continuation of the assessment and the State Board upheld this recommendation. Mississippi practitioners question the purpose and validity of task forces when MDE ultimately develops and drives recommendations while disregarding the time and expertise of practitioners.</p> <p>MPE supports the recommendation of the Accountability Task Force that the Silver NCRC be the sole indicator of career readiness. We encourage the State Board to adopt the recommendation of the Accountability Task Force which does not require the additional qualifiers.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I strongly believe that WorkKeys Silver, along with successful completion of a two-year CTE program with a grade of 70 or higher, would be a strong indicator of student success for Career Readiness.</p>	<p>In support of change</p>
<p>We are for WorkKeys Silver level in the accountability model.</p> <p>We are not for WorkKeys Plus anything else.</p> <p>Some districts do not have CTE/Industry certifications therefore is not equitable.</p> <p>Currently we do not require ACT plus another avenue.</p> <p>We believe the fair and equitable solution is to use Workkeys as a standalone just as the ACT is currently.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore,</p>

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	<p>use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>Please accept these comments on behalf of the Pass Christian Public School District indicating our disagreement to the proposal to amend the business rules of the Mississippi Statewide Accountability System by requiring a Silver National Career Readiness Certificate (NCRC) on ACT WorkKeys in conjunction with a recognized industry certification or career pathway as an indication of career readiness in the College- and Career-Readiness (CCR) component.</p> <p>Our main points are as follows:</p> <ol style="list-style-type: none"> 1. The work of the Accountability Task Force (ATF) leading up to and including their recommendation to the Mississippi Department of Education "that the Silver NCRC serve as the sole indicator of career readiness" is valid and represents a great deal of research, examination, consideration, and potential benefit to the students and future workforce of the State of Mississippi. 2. The importance of including the Silver NCRC as the sole indicator of career readiness must be considered, just as the current CCR component requires students to only meet the ACT benchmarks in English and Math as the sole indicator of college readiness. The requirement for college readiness does not include another 'hoop' through which students must jump. Therefore, the well-vetted and highly respected Silver NCRC WorkKeys benchmark requirement for the Career Readiness piece is adequate, also. Let's not place our career/work-oriented students at an additional disadvantage. 3. The proposed requirement to include a "recognized industry 	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a</p>

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Summary of Comment	MDE Response
<p>certification or "career pathway" is vague, ambiguous, undefined, requires mandatory additional outlay of funding by school districts, and will serve as a roadblock to student success rather than as a student accomplishment. Additionally, it would place small school districts at a disadvantage as they may not have or have access to full CTE programs to meet the additional requirements.</p> <p>4. An impressive sixty-seven percent (67%) of Mississippi counties have successfully completed the arduous requirements to be certified "Work Ready Communities. Following graduation, all students who have obtained a Silver or better WorkKeys NCRC are able to apply for jobs with thousands of partnering businesses and industries in Mississippi and have the distinct advantage of holding a nationally recognized work-ready certificate. Please note that there is no extra or additional requirement. The Silver or better NCRC is a stand-alone advantage, just as it should be when it comes to the Mississippi College and Career Readiness Accountability Standards.</p>	<p>career-readiness pathway and graduates prepared for a career.</p>
<p>I feel that pairing the requirement of Silver level on the WorkKeys with the requirement that students successfully complete an industry certification or career pathway is an unfair requirement for smaller schools and districts. While this requirement will benefit districts who have numerous certification programs and who have enough faculty to offer various courses throughout the day, for those of us in smaller districts, our students often must make choices between CTE classes, finishing the second year of CTE programs, and taking advanced classes.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a</p>

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Summary of Comment	MDE Response
	Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.
<p>I am writing to express my support of the Accountability Task Force recommendation that ONLY the stand-alone Silver level benchmark on WorkKeys be used as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p> <p>I oppose the addition of an industry certification to be counted as successful in the accountability model.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I do not agree with the Inclusion of the ACT WorkKeys {Silver or Higher) in performance measures as a stand-alone indicator. I do not agree with the Inclusion of the ACT WorkKeys (Silver or Higher) and achievement of a national certification.</p> <p>I do agree with the Inclusion of the ACT Work Keys {Silver or Higher) AND completion of a Two - Year Career and Technical Education Pathway in performance measures of the Mississippi Statewide Accountability System.</p>	In support of change
I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two-year CTE program with a grade of “C”	In support of change

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<p>or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve no less.</p>	
<p>I do not support the additional proposed requirement of a national certification in the College and Career Readiness Indicator. Currently, not all career technical programs have national certifications associated with them. Additionally, the ACT national standard is being used as the stand-alone benchmark to determine college readiness. It would not be fair or consistent to mandate that students achieve required scores on two assessments (ACT Work Keys assessment and national certification assessment) to determine career readiness. A Silver Level or higher on the ACT Work Keys assessment should sufficiently demonstrate a student's career readiness.</p> <p>Completion of a two-year CTE program is the strongest indicator of career readiness and should also factor into the College and Career Readiness Indicator. A student who scores a Silver Level or higher on the ACT Work Keys assessment and completes a two-year CTE program is more career ready than one who only scores a Silver Level or higher on the ACT Work Keys assessment. Consideration for adding additional weight to the numerator of the College and Career Readiness Indicator for any student who completes a CTE program and scores a Silver Level or higher on the ACT Work Keys assessment should be strongly considered.</p>	<p>Unsure of position</p>
<p>I recommend that both the Silver level on WorkKeys and the completion of a 2-year career & technical program be recognized as a strong indicator of career readiness. If only a Silver on WorkKeys is recognized, it will not be a true depiction of students that are career ready. These students may only be able to test well or be successful academically. By partnering the WorkKeys Silver level with completion of a 2-year CTE program, the numbers will show a better representation of students that are truly career ready. Students that are completers have not only covered the soft skills required for a career but have also learned job-specific skills needed in the workforce.</p> <p>I do not feel that national certifications should be attached to WorkKeys in the accountability model. While they are very important, not all programs offer national certifications. Out of the 2nd year students that we have WorkKeys tested this school year, only 46% have the opportunity to earn a national certification. By attaching national certifications along with WorkKeys, this could lead to a push from</p>	<p>In support of change</p> <p>Students may achieve either a national industry certification OR a career pathway.</p>

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Summary of Comment	MDE Response
<p>districts to put students in only those programs which is less than half of our CTE programs offered.</p>	
<p>I am writing this letter regarding the addition of the ACT WorkKeys assessment as an indicator to the College and Career Readiness component of the Mississippi accountability model. As it stands right now, all students are held to the college readiness standards whether they are planning on attending college or not. The addition of the ACT WorkKeys assessment to the College and Career Readiness component brings career readiness to light, which is a major step in the right direction.</p> <p>The ACT WorkKeys test is a great measure of career readiness for students and I am glad that it is being considered as an addition to the College and Career Readiness component of the accountability model. I am requesting that you consider giving additional weight to the numerator of the College and Career Readiness indicator for any student who completes a Career Pathway Program. I recommend that if a student scores silver or above on the ACT WorkKeys assessment then he/she should count as a 1 in the numerator and if that student also completes a career pathway program then he/she should calculate at a higher weight of 1.2 in the numerator.</p>	<p>In support of change</p> <p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>We are in support of the WorkKeys Silver level in the accountability model. We are not in support of the WorkKeys Plus or anything else being presented. It is not fair since not all school districts have CTE/Industry certifications available for their students so it's not the same for everyone. With the model now, we do not currently use the ACT plus any other measurement. We are in support to use Workkeys by itself, just like we currently use the ACT in the model.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of</p>

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	<p>success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am currently an elementary principal. My background consists of being a former Algebra I teacher, so I am familiar with state testing and how some students struggle. I am a parent who had child involved in a CTE program. I also served as an assistant principal at Mantachie High School for grades 7 - 12 for eight years. At this position I completed schedules for all students which of course consisted of the different pathways including CTE. Being so heavily involved in course registration and scheduling, I worked with so many students who were torn between being a part of our own agricultural programs or the other CTE programs offered through our technical school shared with the district. We have students who want to be involved in some sort of CTE course every year that he or she is in high school. That speaks so much for our programs that are offered through the Itawamba County School District. There are many CTE courses that have waiting lists (as is found in our Meats and Forestry programs) or have a highly competitive demand within the district.</p> <p>The proposed consideration is for WorkKeys Silver, along with successful completion (grade of C or higher) to be considered as a measurable standard for Career Readiness. This would be such a great benefit to those students who put in the time and effort into a course that does not have an option of earning an industry certification. It would be beneficial for these students to have an alternative in the other courses where they have an interest and are still learning a great skill to likely develop into a future career instead of pushing more toward an area with a certification. These programs seem to be overlooked and would be a great asset to be included in the accountability model.</p>	<p>In support of change</p>
<p>The strongest indicator of Career-Readiness within the Accountability Model should be Career Pathway training through completion of a CTE program providing Mississippi students with the highest level of career training.</p> <p>The CTE Pathway programs that DO NOT currently have national certifications associated with them. SHOULD add the ACT WorkKeys</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>

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<p>as an indicator of career readiness along with the completion of a career pathway.</p> <p>Consider adding weight to the numerator of the College-and Career-Readiness Indicator. The rationalization for this recommendation is that students who complete a career pathway program and graduate high school with specialized career skills will be considerably more career ready than a student who <u>only</u> completed the ACT WorkK.eys at the Silver Level. This compares to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	
<p>I would like to advocate for MDE to include all CTE classes in some way. I believe that every CTE program is important. I believe that WorkKeys Silver along with completion of a 2 year CTE program with a grade of "C" or higher would be a fair and comparable indicator of student success for Career Readiness along with the Industry Certification.</p>	<p>In support of change</p>
<p>I agree with including the ACT WorkKeys in the scores for College and Career Readiness. I feel it will be beneficial to all schools and districts. However, I feel that pairing the requirement of Silver level on the WorkKeys with the requirement that students successfully complete an industry certification or career pathway is an unfair requirement for smaller schools and districts. While this requirement will benefit districts who have numerous certification programs and who have enough faculty to offer various courses throughout the day, for those of us in smaller districts, our students often must make choices between CTE classes, finishing the second year of CTE programs, and taking advanced classes. This is because often our advanced classes or our CTE courses are often only offered once during the school day or school year due to having a limited number of faculty. Therefore, students often cannot participate in both. In including this paired requirement there will be many students who can score at high levels on the WorkKeys but who still cannot be counted as College and Career ready because they had to make choices regarding which classes they could complete.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a</p>

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	Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.
<ul style="list-style-type: none"> ● Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model. ● Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, we do not believe national certifications should also be required along with the ACT WorkKeys. However, the MASCTA Board of Directors strongly supports the MDE’s recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway. ● Finally, we request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program. For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level. 	<p>In support of change</p> <p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
I believe the completion of a 2 year CTE program is also an indicator to employers that the student will complete something they start. I also believe that a Silver Level requirement on the WorkKeys assessment would help the job outlook of the students.	In support of change
I believe that ACT WorkKeys is a useful tool for the students of Mississippi. I believe that using ACT WorkKeys will expand future opportunities for the students of Mississippi. I also believe that using ACT WorkKeys in the accountability model without qualifiers shows businesses that the state of Mississippi is committed to training students to be qualified “work ready” employees. I believe the accountability task force has great intentions with their recommendation because they see	If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not

Summary of Administrative Procedures Act (APA) Comments

Approval to Revise Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2020 specifically the business rules of the Mississippi Statewide Accountability System, Section 25, College- and Career-Readiness, regarding the inclusion of ACT WorkKeys in performance measures

Summary of Comment	MDE Response
<p>the value in not limiting the number of student scores that can be used in the CCR component of the current accountability model.</p>	<p>equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>Recommendations to the State Board of Education regarding implementation of ACT WorkKeys</p> <p>We are presenting additional changes to the College- and Career-Readiness Indicator section related to the implementation of WorkKeys:</p> <p>1 - Administer WorkKeys for all students in their second year of a CTE program.</p> <p>If WorkKeys is truly a quality measure of career-readiness, it should be treated as such, rather than used as an optional replacement for the college-readiness test. The test should be administered for students in the second year of an industry certification or career pathway program. While this recommendation will likely require state funding, there may be opportunities to fund the administration of WorkKeys through partnerships between school districts and regional or state economic development organizations.</p> <p>2 - Include WorkKeys as a third component of the College & Career Readiness (CCR) indicator.</p> <p>The current CCR component consists of ACT Math and ACT English/Reading components.</p>	<p>The MDE does not advocate adding the ACT WorkKeys as a required assessment.</p>

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Summary of Comment	MDE Response
<p>WorkKeys should be included as a third measure of the College and Career Readiness component. This Career-Readiness component should count for 10 points of the 50pt CCR component, along 20 points for ACT Math and 20 points for ACT English/Reading.</p>	
<p>We are in opposition of the MDE's modification of the Accountability Task Force recommendation for measuring student success on the Workkeys assessment. We fully support the use of a stand-alone Silver level benchmark on Work keys as the indicator of student CAREER-readiness for the purposes of the CCR Component in the Statewide Accountability Model.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am unequivocally supportive of using the WorkKeys Assessment. However, I do believe there are some concerns as it relates to the most recent proposal made to include WorkKeys (NCRC) in the accountability model under the CCR portion paired with another standard (national certification or MDE approved standard).</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or</p>

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Summary of Comment	MDE Response
	<p>Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am writing on behalf of the Laurel School District regarding the ACT WorkKeys assessment and submit the following as part of the APA process.</p> <p>We feel that students scoring Silver or above on the WorkKeys assessment should be included in the numerator for the Math and/or English components of the College and Career Readiness component in lieu of the ACT benchmark requirement.</p> <p>We do not agree with MDE’s modification that results in students having to complete both their industry certification, along with meeting the Silver level on the WorkKeys test to be included in the component. Currently, many programs do not offer a national certification or an equivalent.</p> <p>We feel this combination does not truly measure whether a student is “career ready.” According to reports, industries consider a Silver level as a good indicator of success.</p> <p>We are in favor of allowing a Silver level score to be considered successful in lieu of the ACT college prep benchmark.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College- and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a</p>

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Summary of Comment	MDE Response
	career-readiness pathway and graduates prepared for a career.

(Excerpt from the *Mississippi Public School Accountability Standards, 2020*)

Proposed revisions to the Business Rule 25 of the Mississippi Statewide Assessment System

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 or ACT WorkKeys assessment will be used in 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: $(\text{Math} + \text{English/Reading}) \div 2$
- 25.3 A student will be included in the numerator for Mathematics if he/she is considered College- and 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.
- 25.8 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 Deleted.
- 25.11 A student's score will be applied to the school in which the student is enrolled in MSIS at the time of the Senior Snapshot.
- 25.12 In lieu of the performance requirements established in Sections 25.3, and 25.4, a student may obtain a Silver level or higher National Career Readiness Certificate administered through the ACT WorkKeys assessment and successfully complete an industry certification or career pathway recognized by the Mississippi Department of Education.
- 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 calculation.

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~~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. Deleted~~
- 25.11 A student's score will be applied to the school in which the student is enrolled in MSIS at the time of the Senior Snapshot.
- 25.12 ~~No other assessments will be allowed as a substitution for the ACT in the College and Career Readiness component.~~ In lieu of the performance requirements established in Sections 25.3, and 25.4, a student may obtain a Silver level or higher National Career Readiness Certificate administered through the ACT WorkKeys assessment and successfully complete an industry certification or career pathway recognized by the Mississippi Department of Education.
- 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 calculation.