

OFFICE OF CHIEF ACCOUNTABILITY OFFICER
Summary of State Board of Education Agenda Items
April 15, 2021

OFFICE OF DISTRICT AND SCHOOL PERFORMANCE

03. 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. March 26, 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 Accreditation 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>I strongly believe that the inclusion of the WorkKeys assessment on its own should not serve as an indicator of career readiness in the Statewide Accountability Model. Regardless of the scoring level. My fear is that school systems will game the Accountability Model by providing the WorkKeys assessment to as many students as possible and diminish the importance of true career readiness by completing a Career Technology course.</p> <p>I am in favor of coupling the completion of a Career Technology Course or Industry Certification with a Silver, Gold, or Platinum WorkKeys score to constitute career readiness in the Statewide Accountability Model.</p>	<p>In support</p>
<p>Please accept these public comments, submitted on behalf of The Parents' Campaign, regarding the State Board of Education's (SBE's) amended position on the addition of the WorkKeys assessment as an indicator of success in the College- and Career-Readiness (CCR) Component of the Statewide Accountability System.</p> <p>While The Parents' Campaign strongly supports the addition of WorkKeys to the CCR component, we oppose the change currently being considered by the SBE. The board's modified recommendation, which allows scores at the Gold and Platinum levels as stand-alone career-readiness indicators but requires an industry certification or a career pathway to accompany a Silver-level score, falls short in at least three important ways.</p> <ol style="list-style-type: none"> 1. It is inequitable. 2. It reinforces the negative stereotype that the high school career track is inferior to the college prep track. 3. It ignores the industry standard. <p>The Parents' Campaign urges the State Board of Education to modify the business rules in the College- and Career-Readiness component of the Statewide Accountability System to allow a score at the Silver level on the WorkKeys assessment to be considered successful as a stand-alone metric in lieu of the ACT college prep benchmark for students who are enrolled in or have completed at least one CTE course.</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-</p>

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Summary of Comment	MDE Response
	readiness pathway and graduates prepared for a career.
It has been a number of years since I had a meeting with my High School Counselor to plan for College. I was so ill-prepared to make such a profound decision for my future. I did not know the consequences of not being aggressively involved in planning my college objectives. My girls were so fortunate to be tutored for making the best decisions for their ability, their financial standing, and their preferred major. ACT scores and SAT scores worked for my three girls, but I received mediocre scores when I was assessed. What if the choices can be made by the input of parents, teachers, and students. Some students are not ready for college courses, some students want to become an apprentice and some students are ready for college. Where does this leave everyone?	Off topic.
The conversation about the WorkKeys assessment has lost its beginning. The point, I thought, was to measure career readiness, to assess students who are completing a high school experience that will result in going into an entry level job or internship/apprentice type job once they graduate, and to give schools and districts an opportunity to earn accountability points for the students' who show this level of success. Please approve as part of the Accountability System the Silver Level on the ACT Workkeys Assessment for our students as evidence of being Career Ready.	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.

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Summary of Comment	MDE Response
<p>The current proposal of a gold or platinum certification is not in line with the recommendation of the business community. A silver certification should meet the requirement for the career-indicator. The current recommendation is set more for college ready but not career ready. Why would we make this higher than the standard set by the business community? Please approve as part of the Accountability System the Silver Level on WorkKeys as evidence of being Career Ready. This is what is best for 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>Please do not support the change to include Work Keys component.</p>	<p>The MDE supports the inclusion of WorkKeys so long as the performance measure is equivalent to existing measures of performance in the College- and Career-Readiness (CCR) component of the Mississippi Statewide Accountability System.</p>
<p>It is vitally import that we strengthen our career track for our students. For too long our system has emphasized the college prep for which many students are neither feasible financially nor practically. Our students need and deserve to have a more equitable opportunity that is not college prep.</p>	<p>Including a career pathway or industry certification in the measure of success provides a greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is</p>

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<p>The additional completion requirements will only serve to weaken further an already weak and lacking course path.</p>	<p>indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am a retired Special Service Director (Special Education, Gifted and 504 Services). Creating a culture of student achievement from PreK – 12th grade and post-secondary is one of my sole desires for our children. At this time, I am continuing to work for our children through my service on the Columbus Municipal School Board, in which I am currently the Board President.</p> <p>I strongly support the Parents' Campaign for inclusion of the WorkKeys assessment in the College- and Career-Readiness component of the Statewide Accountability System as a measure of career-readiness for students who are enrolled in or have completed at least one CTE course, and the use of a stand-alone Silver-level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability System.</p> <p>I respectfully ask that you support this initiative toward our children's future to gain meaningful employment after graduation from high school.</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 opposed to the modification proposed by the SBE. Please do not modify the SAS.</p>	<p>The MDE supports the inclusion of WorkKeys so long as the performance measure is equivalent to existing measures of performance in the college and career readiness component of the Mississippi Statewide Accountability System.</p>
<p>We at the South Panola School District strongly believe that any student who completes at least one CTE course and scores Silver on the ACT</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success</p>

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<p>WorkKeys should stand alone as an indicator for College and Career Ready. We believe that the SBE proposal would not be in line with the industrial community of Panola County.</p>	<p>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>Vicksburg Warren School District supports the inclusion of the WorkKeys assessment in the College- and Career-Readiness component of the Statewide Accountability System as a measure of career-readiness for students who are enrolled in or have completed at least <u>one CTE course</u>, and the use of a <u>stand-alone Silver-level benchmark</u> on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability 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</p>

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	<p>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 this is not fair to school districts. Industry only requires that the needed level to obtain is Silver. As we know, this test has not been the focus in school districts period, and not to say anything would be unfair to our community and students. As a matter of fact, we don't even offer any assistance with WorkKeys yet, but we will during the 2021-2022 school year because of the new graduation diploma designations. Out of concern a teacher, out of the blue, went and took the WorkKeys about two weeks ago after work one day to see what the test is all about so that we can begin prepping students for the test. She scored Gold and stated if she had 5 more minutes, she would have scored Platinum.</p> <p>If the WorkKeys is going to be included for CCR, and Silver is the career ready level, that is the level districts should meet. Gold and platinum could be "bonus" points of some sort.</p> <p>I do not mind career and technical education being a contributor to CCR, but why should it exceed what career ready means. Industry says silver.</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>Warren Central High School supports the inclusion of the WorkKeys assessment in the College and Career Readiness component of the Statewide Accountability System as a measure of career-readiness and the use of a stand-alone Silver-level benchmark score on WorkKeys as</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</p>

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<p>the indicator of student career-readiness for purposes of the Statewide Accountability System.</p>	<p>(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>In my mind, the addition of WorkKeys to the CCR component was an innovative decision on part of the MS State Board of Education. It was an avant-garde approach at "leveling" the playing field when it came to Mississippi's High Schools and State Accountability.</p> <p>I highly encourage our state's Board to measure career readiness accurately using a Silver level on the WorkKeys assessment as a stand-alone metric to measure student's readiness to enter the workplace.</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</p>

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	<p>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 public comments, submitted on behalf of The Pearl River County’s Career and Technical Education Directors regarding the State Board of Education’s (SBE’s) amended position on the addition of the WorkKeys assessment as an indicator of success in the College-and-Career-Readiness (CCR) Component of the Statewide Accountability System.</p> <p>We fully support the addition of the WorkKeys assessment requirement of the Silver-level score for the CCR component; however, we do not support the addition of students’ obtaining a national certification in order to meet accountability. Our areas of concern are included in the following:</p> <ul style="list-style-type: none"> • Lack of national certification for many CTE programs including Business/ Marketing/Finance Architecture/Drafting, Engineering, Teacher Academy, Digital Media Technology, Agriculture & Environmental Science & Technology. • Limited availability of CTE slots at some CTE centers which is exacerbated by the lack of funding for new teacher units and programs that offer national certifications. • Negative stereotyping of CTE students. The educators and businesses in our state have worked hard to change the perception of Career and Technical Education, which was once known as Vocational Education. • CTE students are on a career prep pathway and not a college prep pathway; therefore, they should not be held to the college readiness benchmarks, but to a stand-alone Silver-level score on the WorkKeys. • If college bound students are required to meet certain scores on the ACT, then career pathway students should be allowed to meet 	<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>a Silver-level on the WorkKeys as their stand-alone career readiness indicator. The ACT is not an indicator of career readiness, however Workkeys is.</p>	
<p>I am writing today as an educator, and as a citizen of Mississippi. I am against the modification of the WorkKeys rules currently being considered by the State Board of Education (SBE) despite being in overall favor of assign to Work Keys to the Statewide Accountability System.</p>	<p>The MDE supports the inclusion of WorkKeys so long as the performance measure is equivalent to existing measures of performance in the college and career readiness component of the Mississippi Statewide Accountability System.</p>
<p>I am in favor of the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. I believe it is needful and beneficial for our 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 also am very much in favor of the adoption of the WorkKeys assessment into our school districts' CCR ratings, so thank you for your work on this</p>	<p>The MDE supports the inclusion of WorkKeys so long as the</p>

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<p>issue. This adoption, if done properly, will make good progress in aligning our use of assessments and accreditation ratings with our public school system’s binary missions of either preparing students for continuing education or for the workforce.</p> <p>The proposed changes that are currently in front of the SBE, namely to exclude the Silver NCRC as a stand-alone measure for career-readiness, is disingenuous to the reasoning put forward by the Mississippi Department of Education for including the WorkKeys assessment in the first place. The public’s understanding of the reasoning behind this inclusion was that it will finally take into account a metric for career readiness, treating students on a career track more equitably with those on a college track. The effects of this proposed change before the Board would counteract some of the good of the overall plan by a) ignoring the industry sector’s widespread approval of a Silver NCRC as a stand-alone indicator for career readiness, b) supporting inequitable features already in place in the current system and c) continuing to treat college and career readiness as comparable, not binary goals of a public education. It therefore perpetuates the problem that this adoption at its outset is trying to address.</p>	<p>performance measure is equivalent to existing measures of performance in the college and career readiness component of the Mississippi Statewide Accountability System.</p>
<p>With our mission/standards being both College and Career Readiness, I am in favor of the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. My decision is based on the need to provide pathways to success for all students. As educators, it is imperative that we provide opportunities and avenues for ALL Students in Mississippi.</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>Our district's vision is "Preparing ALL for Success". It is important for our school district and it is important for Mississippi. It is necessary that we provide opportunities and avenues for all students in Mississippi. It is necessary that we develop a productive workforce for our state. I am in favor of the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the 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 strongly support the addition of WorkKeys assessment as an indicator of CCR success. However, the proposal to include national certification as part of the CCR component is flawed in several ways.</p> <ol style="list-style-type: none"> 1. It is unfair to those students taking career tech courses in which a national certification is not in place. 2. The Silver Level score is the standard by which business and industry determine career readiness. 	<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</p>

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<p>3. Career track students are not on the college prep track and should not be held to the college readiness benchmarks.</p> <p>I urge the State Board to modify the business rules as they relate to the College and Career Readiness standard to allow a score of Silver Level on the WorkKeys assessment to be considered successful for students enrolled in or who have completed a CTE class. The WorkKeys Silver Level should stand alone as the CCR benchmark for CTE students.</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>I applaud the effort to place the ACT WorkKeys into the model under the college and career block of the accountability model. For too long we’ve ignored the career component that is so essential for life success and statewide prosperity. Everyone may not go to college, but everyone will go to work. Career prepared seems to be painted as a lesser choice than college prepared and that is not the case. The Vicksburg Warren School District supports the inclusion of the WorkKeys assessment in the College- and Career-Readiness component of the Statewide Accountability System as a measure of career-readiness for students who are enrolled in or have completed at least <u>one CTE course</u>, and the use of a <u>stand-alone Silver-level benchmark</u> on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability System. We believe student that meets either a Silver level on ACT WorkKeys, or ACT College readiness standard should count equally in that block. We do not support the changes that have been proposed by MDE that include addition industry credentials.</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</p>

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Summary of Comment	MDE Response
	NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.
<p>The move to include ACT Workkeys into the state accountability model is outstanding and long past due. We are in dire need of having a "career" portion of the College and CAREER Readiness portion of the model. Including ACT Workkeys has been a topic that has been discussed favorably by educational administrators for many years and I am encouraged that MDE is finally listening to us at least in some capacity.</p> <p>We support the inclusion of the Workkeys assessment and a score of silver being the rate which measures success with no additional requirements. We do not support MDE's flawed perspective and misinformation that there is a need for additional requirements.</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>It is imperative that we provide opportunities and avenues for all Students in Mississippi. Therefore, I am in favor of the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. My decision is based on the need to provide pathways to success 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</p>

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>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 feel that it is extremely important that we implement the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career-track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. As the mother of a special education student as well as the case manager for our special services department, it is imperative that we provide opportunities for ALL students in Mississippi.</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</p>

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
	benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.
<p>It is imperative that we provide opportunities and avenues for all Students in Mississippi. Therefore, I am in favor of the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. My decision is based on the need to provide pathways to success 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 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 Mississippi Economic Council urges the Mississippi State Board of Education to adopt the Accountability Task Force's recommendation and use Silver Level ACT WorkKeys® as a stand-alone component. We believe the practitioners who serve on the task force have the hands-on experience to understand how this assessment should be utilized.</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>

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>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>The State Board of Education’s move to adopt ACT WorkKeys (hereafter “WorkKeys”) as a measure of career readiness signals the embrace of a “both/and” approach to college and career readiness. We recognize the positive step of measuring career readiness, just as we measure college readiness through the ACT. We also recognize the State Board’s move to allow WorkKeys Silver (with CTE requirement), Gold, and Platinum scores to be counted in the College- and Career-Readiness (CCR) component of the State Accountability Model. Fulfilling the limitless potential of Mississippi’s children requires us to give all students meaningful access to all college and career pathways. We recommend the following action steps related to the adoption of the ACT WorkKeys Assessment:</p> <ol style="list-style-type: none"> 1. Approve the State Board’s proposal regarding the inclusion of ACT WorkKeys in the CCR component of the Accountability Model. Early discussions regarding the inclusion of ACT WorkKeys raised concerns about how the assessment would be administered at the local level. Chief among those concerns was the prospect that schools would have a perverse incentive to push more students towards WorkKeys instead of doing more to prepare students for the more rigorous ACT. Such a move would’ve prioritized accountability points at the expense of the postsecondary needs of students, particularly students of color. The current policy recommendation, which allows ACT 	<p>In support</p>

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>WorkKeys to be included in the CCR component at Silver (with CTE requirement), Gold, or Platinum score addresses our most pressing concern which is why we’re recommending they approve the proposal.</p> <p>2. Require the Mississippi Department of Education to collect critical data during the implementation of ACT WorkKeys. Collecting data during the implementation of ACT WorkKeys will maximize the assessment’s effect on student achievement. We recommend the Department of Education to collect the following data in order to get the most out of the WorkKeys assessment:</p> <ul style="list-style-type: none"> • WorkKeys Performance by CTE Program: This data will allow the Department of Education to identify which districts have robust CTE programs with high performing WorkKeys. This data set will also help districts compare their performance with other districts in the state. • Geographic Information: Students who have earned the National Career Readiness Certification (NCRC) would appeal to career training programs and industries. Knowing which regions of the state have certified students will give potential employers information to know where to recruit workers or where to open new businesses. • WorkKeys Performance by Career Pathway Program, Race/Ethnicity, and Income Level: Having racial and socioeconomic data of CTE students will help the Department of Education ensure that all students have equitable access to CTE opportunities. • Career Information for WorkKeys Test Takers: Surveying students who take the WorkKeys assessment about their future plans will give districts insight into what supports they can provide for their students. • Records of Districts with Anti-Discrimination Policies in Place for CTE Placement: Some districts have guiding policies in place to ensure that there is no discrimination during CTE placements. We want to ensure that all school districts have policies in place that ensure that all students have access to all CTE programs, especially those leading to the most lucrative careers in the region. <p>In addition to these recommendations, we encourage state policymakers to explore strategies to take the financial burden of administering ACT WorkKeys off school districts. We encourage the state to explore</p>	

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
opportunities for economic development groups or private industry to partner with school districts to cover the costs of the career-readiness assessment.	

From: [Marcus Boudreaux](#)
To: [Accreditation Shared](#)
Subject: WorkKeys APA
Date: Monday, March 22, 2021 4:19:46 PM

Good Afternoon,

I would like to provide my opinion on the incorporation of the WorkKeys assessment into the Statewide Accountability Model.

I strongly believe that the inclusion of the WorkKeys assessment on it's own should not serve as an indicator of career readiness in the Statewide Accountability Model. Regardless of the scoring level. My fear is that school systems will game the Accountability Model by providing the WorkKeys assessment to as many students as possible and diminish the importance of true career readiness by completing a Career Technology course.

I am in favor of coupling the completion of a Career Technology Course or Industry Certification with a Silver, Gold, or Platinum WorkKeys score to constitute career readiness in the Statewide Accountability Model.

Thank You,

--

Marcus Boudreaux
Superintendent
Biloxi Public Schools



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From: [Nancy Loome](#)
To: [Accreditation Shared](#)
Cc: [Rosemary Aultman](#); [Karen Elam](#); [Angela Bass](#); [Ronnie McGehee](#); [Glen East](#)
Subject: Public comments regarding the inclusion of WorkKeys in the accountability system
Date: Monday, March 22, 2021 4:31:07 PM
Attachments: [ParentsCampaign_PublicComments_WorkKeys2.pdf](#)

Alan, please find attached public comments from The Parents' Campaign regarding the State Board's modified position on the inclusion of the WorkKeys assessment in the CCR component of the Statewide Accountability System.

Have a great week!

Nancy

Nancy Loome, Executive Director
The Parents' Campaign
222 N. President Street, Suite 102
Jackson, MS 39201
601.961.4551 office
601.672.0953 mobile
601.961.4552 fax
www.msparentscampaign.org

The goal of The Parents' Campaign is to engender an education system that affords all children access to excellent public schools so that children can become what they dream.



March 22, 2021

Mr. Alan Burrow, Executive Director
District and School Performance
Mississippi Department of Education
accreditation@mdek12.org

Dear Mr. Burrow,

Please accept these public comments, submitted on behalf of The Parents' Campaign, regarding the State Board of Education's (SBE's) amended position on the addition of the WorkKeys assessment as an indicator of success in the College- and Career-Readiness (CCR) Component of the Statewide Accountability System.

While The Parents' Campaign strongly supports the addition of WorkKeys to the CCR component, we oppose the change currently being considered by the SBE. The board's modified recommendation, which allows scores at the Gold and Platinum levels as stand-alone career-readiness indicators but requires an industry certification or a career pathway to accompany a Silver-level score, falls short in at least three important ways.

1. **It is inequitable.** Not all career tech areas have industry certifications, so this is not an option for students in many career fields. Additionally, numerous lower-wealth school districts do not have their own Career Tech programs, and their students must participate in career tech courses offered by other school districts via a coalition. Districts without their own CTE programs are subject to coalition agreements that impose limits on the number of career tech slots their districts are permitted, restricting the number of out-of-district students who can participate in the program and the number of courses each student may take. No such caps are imposed on districts that host their own career tech programs. These course participation restrictions limit the number of students in coalition partnerships who can complete a career pathway to accompany a Silver level, while allowing school districts with their own career tech programs an unlimited number of students who can complete the additional requirement. This creates a gross inequity within the Statewide Accountability System.
2. **It reinforces the negative stereotype that the high school career track is inferior to the college prep track.** The MDE argues that the WorkKeys assessment is less rigorous than the ACT and is, therefore, an insufficient measure of career readiness at the Silver level. The MDE staff bases its rigor argument on a limited set of data showing that many career track students who score at the Silver level on WorkKeys do not meet the college readiness benchmark on the ACT. Career track students are not on the college prep track and should not be held to the college readiness benchmarks. The ACT is strictly a college prep assessment and is a completely invalid measure of career readiness. The perception that the industry workforce standard is inferior to the college prep standard is harmful to CTE programs and counterproductive to the goals of public education.

3. **It ignores the industry standard.** The business community has been unequivocal that a Silver-level score is the standard used by business and industry to determine career readiness. Industry is far better positioned to decide its own standard than is the academic community.

Currently, the College- and Career-Readiness component of the accountability model is a misnomer. There is no career-readiness indicator. As it stands, every student, even those who are not college bound, are required to meet the benchmark for college readiness to be considered "successful." This is why industry leaders, elected officials, and education leaders have repeatedly called for the addition of a true career-readiness indicator to fairly assess the work of school districts to provide students on a career track the skills they need to be successful. That is precisely what the WorkKeys assessment does.

The MDE staff's assertion that use of the Silver-level score as a stand-alone metric would require a resetting of cut scores is misguided. The staff has predicted that career track students are likely to score better on a career track measure than they have on a college prep measure and that high school and district accountability ratings will improve as a result, a reasonable assumption. What is unreasonable is the assertion that the improved ratings would not be accurate. To the contrary, because the improved ratings would be due to a more accurate measure of career readiness, the ratings will likely be significantly more accurate than previous ratings have been. A reset of cut scores to artificially deflate ratings to bring them into line with a previously flawed CCR measure would be a disservice to students, teachers, and communities statewide.

The Parents' Campaign urges the State Board of Education to modify the business rules in the College- and Career-Readiness component of the Statewide Accountability System to allow a score at the Silver level on the WorkKeys assessment to be considered successful as a stand-alone metric in lieu of the ACT college prep benchmark for students who are enrolled in or have completed at least one CTE course.

Sincerely,



Nancy Loomer
Executive Director

From: [Brenda Russell](#)
To: [Accreditation Shared](#)
Subject: Student Assessment For College
Date: Monday, March 22, 2021 4:42:53 PM

It's been a number of years since I had a meeting with my High School Counselor to plan for College. I was so ill prepared to make such a profound decision for my future. I did not know the consequences of not being aggressively involved in planning my college objectives. My girls were so fortunate to be tutored for making the best decisions for their ability, their financial standing and their preferred Major. ACT scores and SAT scores worked for my three girls but I received mediocre scores when I was assessed. Let's think about in a different, what if the choices can be made by the input of parents, teachers and students. Some students are not ready for college courses, some students want to become an apprentice and some students are ready for college. Where does this leave everyone?

We can't make our children stumble into "I don't know what I want to do."

Cordially,

Brenda M Russell
A Concerned Parent

Sent from my T-Mobile 4G LTE Device
Get [Outlook for Android](#)

From: [Babette Duty](#)
To: [Accreditation Shared](#)
Cc: [Laura Cameron](#)
Subject: Work Keys Comment
Date: Monday, March 22, 2021 5:04:50 PM

State Board of Education Members,

The conversation about the WorkKeys assessment has lost its beginning. The point, I thought, was to measure career readiness, to assess students who are completing a high school experience that will result in going into an entry level job or internship/apprentice type job once they graduate, and to give schools and districts an opportunity to earn accountability points for the students' who show this level of success.

The following is how the ACT discusses the Gold and Platinum Levels on the Workkeys assessment.

The ACT NCRC Demonstrates College Competence

In addition, students pursuing a postsecondary education are eligible for college credit because the ACT NCRC demonstrates college-level competency. Achieving a Platinum or Gold level is comparable to achievement in college-level coursework. The American Council on Education (ACE) validates this by recommending institutions award 3 credit hours of quantitative reasoning and 1 credit hour of information literacy. Credit awards are at the discretion of each school.

I infer from this paragraph from [ACT.org](#) that Gold and Platinum Levels prove a student is college ready. We are trying to prove that our CTE students are Career Ready. Those students who attend CTE courses and are planning to go to college, take the ACT. Every 11th grader in Mississippi takes the ACT each year. There is no need to provide another assessment to determine if a student is college ready.

The work community (I know this because Covington County is working on becoming a Work Ready Community) suggested Silver Level as the benchmark. Why wouldn't we follow that suggestion? After all they are the people who will offer these entry level jobs and apprenticeships to our students.

Please approve as part of the Accountability System the Silver Level on the ACT Workkeys Assessment for our students as evidence of being Career Ready.

This will serve all stakeholders.

Best regards,

Babette Duty
Superintendent
Covington County School District
1211 South Dogwood
P.O. Box 1269

Collins, MS 39428
601-765-8247

The Lord is my light and my salvation. Whom shall I fear? Psalm 27:1

#putthebuggyup

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From: [Charles L. Breland](#)
To: [Accreditation Shared](#)
Subject: WorkKeys and CCR
Date: Monday, March 22, 2021 5:56:57 PM

The current proposal of a gold or platinum certification is not in line with the recommendation of the business community. A silver certification should meet the requirement for the career-indicator.

The current recommendation is set more for college ready but not career ready. Why would we make this higher than the standard set by the business community?

Please approve as part of the Accountability System the Silver Level on WorkKeys as evidence of being Career Ready. This is what is best for students.

Charles L. Breland, Superintendent
Greene County School District
P.O. Box 1329
Leakesville, MS 39451
cbreland@greene.k12.ms.us
601-394-2364



One Team. One Goal
BE the Difference

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From: [susan.jarvis](#)
To: [Accreditation Shared](#)
Subject: Career Track
Date: Monday, March 22, 2021 6:39:15 PM

Please do not support the change to include Work Keys component.
-Susan Jarvis

From: [Darla Bryant](#)
To: [Accreditation Shared](#)
Subject: Career Track
Date: Monday, March 22, 2021 8:43:52 PM

It is vitally import that we strengthen our career track for our students. For too long our system has emphasized the college prep for which many students is neither feasible financially nor practically. Our students need and deserve to have a more equitable opportunity that is not college prep. The additional completion requirements will only serve to weaken further an already weak and lacking course path.

[Sent from Yahoo Mail for iPhone](#)

From: [Cox, Yvonne](#)
To: [Accreditation Shared](#)
Cc: [Yvonne B Cox](#)
Subject: Response - Parents" Campaign for inclusion of the WorkKeys assessment in the College- and Career-Readiness
Date: Monday, March 22, 2021 9:02:39 PM

March 22, 2021

Mr. Burrow,

My name is Yvonne B. Cox. I am a retired Special Service Director (Special Education, Gifted and 504 Services). Creating a culture of student achievement from PreK – 12th grade and post-secondary is one of my sole desires for our children. At this time, I am continuing to work for our children through my service on the Columbus Municipal School Board, in which I am currently the Board President.

I strongly support the Parents' Campaign for inclusion of the WorkKeys assessment in the College- and Career-Readiness component of the Statewide Accountability System as a measure of career-readiness for students who are enrolled in or have completed at least one CTE course, and the use of a stand-alone Silver-level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability System.

For years, educators have pondered to implement effective graduation strategies to support at-risk students and students with special needs (IDEA eligible). I have seen so many of our children fall through the cracks after working so hard to graduate. Namely, due to them not being able to successfully pass all the Subject Area Test required. In addition, the process currently in place has been of a limited assistance to them. Therefore, we have a greater number of students dropping out of school as early as the 9th grade.

I respectfully ask that you support this initiative toward our children's future to gain meaningful employment after graduation from high school. Thank you for reading my letter of concern.

Sincerely,
Yvonne B. Cox, Ed.S

Yvonne B. Cox
In all our decisions we make ... Think ... Children First!

From: [Petesy Smith](#)
To: [Accreditation Shared](#)
Subject: modification of SAS
Date: Monday, March 22, 2021 9:37:08 PM

Mr. Burrow,

I am opposed to the modification proposed by the SBE. Please do not modify the SAS.

Patricia Peterson Smith
P.O. Box 589
Vicksburg, MS 39181
Telephone: 601-638-5178
Facsimile: 1-866-935-4619
ppsmith@prodigy.net

From: [Trea Higdon](#)
To: [Accreditation Shared](#)
Subject: Public comment
Date: Tuesday, March 23, 2021 8:51:00 AM

Good morning,

I am Trea Higdon, CTE Director for the South Panola School District. We at the South Panola School District strongly believe that any student who completes at least one CTE course and scores Silver on the ACT WorkKeys should stand alone as an indicator for College and Career Ready.

The industrial community of Panola County has deemed themselves as an ACT WorkKeys community.

We believe that the SBE proposal would not be in line with the industrial community of Panola County.

Sincerely,

Coach Trea Higdon, Director
South Panola School District
662-563-8992 (office)

From: [Gwen Reiber](#)
To: [Accreditation Shared](#)
Cc: [Chad Shealy](#)
Subject: Comments CCR Component
Date: Tuesday, March 23, 2021 9:23:01 AM

MDEs recommendation seems to indicate that "rigor" for a student preparing for a career must match the "rigor" of the ACT. However, that reasoning is flawed as preparedness in those respective tracks are measuring different knowledge/skills. We are encouraged that the MDE appears to recognize that the ACT is a poor career preparedness assessment. But, to demand "[academic] rigor" as a standard for measuring career preparedness by maintaining that "rigor" on the two tracks must be equal (though I am not sure the standard one would use to determine such) is using the same poor tool for evaluation of career readiness.

We have all recognized that college is not for everyone. If it is the job of Mississippi schools to prepare students for life, then we must measure success of those that choose different tracks in a way consistent with the requirements/goals/standards for those tracks. In the Vicksburg Warren School District, we have identified the 4Es--4 Exit Strategies from which the students choose. These include Enrollment in College, Employment (Career), Enlistment in Military, or Entrepreneur (starting one's own business). Certainly, the criteria for readiness is not the same across the board. Focus on "rigor" clouds the issue of readiness, reinforces negative stereotypes of the career tech track and ignores the recommendation of business and industry regarding the appropriate career-readiness indicator.

Vicksburg Warren School District supports the inclusion of the WorkKeys assessment in the College- and Career-Readiness component of the Statewide Accountability System as a measure of career-readiness for students who are enrolled in or have completed at least one CTE course, and the use of a stand-alone Silver-level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability System.

Thank you for the opportunity to express our thoughts.

--

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

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Vicksburg Warren School District
1500 Mission 66
Vicksburg, MS 39182
601-638-5122

From: [James Covington](#)
To: [Accreditation Shared](#)
Subject: CCR and WorkKeys
Date: Tuesday, March 23, 2021 10:41:28 AM

I believe that this is not fair to school districts. Industry only requires that the needed level to obtain is Silver. As we know, this test has not been the focus in school districts period, and not to say anything would be unfair to our community and students. As a matter of fact, we don't even offer any assistance with WorkKeys yet but we will during the 2021-2022 school year because of the new graduation diploma designations. Out of concern a teacher, out of the blue, went and took the WorkKeys about two weeks ago after work one day to see what the test is all about so that we can begin prepping students for the test. She scored Gold and stated if she had 5 more minutes, she would have scored Platinum.

If the WorkKeys is going to be included for CCR, and Silver is the career ready level, that's the level districts should meet. Gold and platinum could be "bonus" points of some sort.

I don't mind career and technical education being a contributor to CCR, but why should it exceed what career ready means. Industry says silver.

These are my thoughts....

Sent from my iPhone

From: [Eric Green](#)
To: [Accreditation Shared](#)
Subject: ACT WorkKeys CCR Component APA
Date: Tuesday, March 23, 2021 11:26:50 AM

Mr. Burrow,

Thank you for the opportunity to address the MDE's recommendation for adding the ACT WorkKeys assessment to the CCR component of our state accountability model.

As the recommendation is written now, the MDE is proposing that to meet the career readiness benchmark score in the accountability model, students will have to score Silver on the WorkKeys assessment and complete a career pathway track or receive a national certification alongside their score. The administrative team at Warren Central High School and the Vicksburg Warren School District does not support this recommendation as written.

At WCHS, we encourage all of our students to participate in the ACT multiple times during their 4 years, participate in our Advanced Placement classes, as well as take dual credit academic and dual credit CTE courses. We have also tested our CTE students on the ACT WorkKeys for the past three years because our business community has asked us to do so. All of our students participate in career pathways through our Vicksburg Warren College and Career Academies. We see all of these as components of a college and career ready student, and none of these is weighted heavier than another.

I have seen discussion about the ACT WorkKeys assessment not being as rigorous as the ACT, so therefore, more criteria added to the WorkKeys CCR proposal is justifiable. We wholeheartedly **do not agree** with adding any other criteria save the Silver score on the WorkKeys assessment. Since all education should lead to employment, students who choose to pursue a career in employment right after graduation are not choosing a less rigorous path than those students whose employment is beyond a college or university setting. They are simply choosing the best path to success for them and their family.

All of this being said, Warren Central High School supports the inclusion of the WorkKeys assessment in the College and Career Readiness component of the Statewide Accountability System as a measure of career-readiness and the use of a stand-alone Silver-level benchmark score on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability System.

Thank you for your time,

Eric M. Green
Principal
Warren Central High School
Graduating Students College, Career, and Life Prepared

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Vicksburg Warren School District

1500 Mission 66

Vicksburg, MS 39182

601-638-5122

From: [David Adams](#)
To: [Accreditation Shared](#)
Subject: Public Comment on amended position of WorkKeys as an indicator of success in the CCR component of the Statewide Accountability System
Date: Tuesday, March 23, 2021 12:22:13 PM

Mr. Burrow:

In my mind, the addition of WorkKeys to the CCR component was an innovative decision on part of the MS State Board of Education. It was an avant-garde approach at "leveling" the playing field when it came to Mississippi's High Schools and State Accountability.

Now, with the sought after "modification" to the stand alone career readiness indicator where the industry's Silver Level of certification is not supposedly applicable to "rigorous" ACT achievement, thus a Gold or Platinum Level should be obtained by all students on this career route, is ludicrous.

Forever, in Mississippi, we have always sought to compare the proverbial "apples" to "oranges" when it comes to state testing," I have never understood why and have railed against the inequality and ineptitude that this has represented since its start - MCT to MCT2, bridge maps to "bridge" from MCT2 to Common Core, Common Core to MAAP - where each one compares a student in relation to the standards of a certain grade to different standards or ones with more "depth" in a subsequent grade - the metrics have never added up in my mind, but forgive me, I digress.

So, when, we, as a state, have finally started looking at measuring aptitude in correlation to a trade, and treating it as a set of subskills similar, but not exactly the same as those for students who are on a college prep track, we muddy the waters once again in our quest to metrically measure all fruit in general, but again, cannot make the distinction between the different kinds.

Now back to the ludicrous part, in all honesty, we once again cannot differentiate by student need and industry certification? Is the State Board actually stating that students on a career track instead of a college prep track are not as bright as the ones going to college? Because stereotyping is the word that comes to mind when I read the purposed "modification" to the WorkKeys addition to the CCR component necessitating a Gold or Platinum Level to be comparable to the ACT. Why is the ACT even being used to measure career readiness - it is a fallible college prep assessment (as you well know) and does not measure any facet of career readiness.

And finally, and honestly, there is not a "real" career indicator tied to the College and Career Readiness component - all students, even those not going to college, have to meet the benchmark for college readiness. So when the industries of our state, elected leaders, superintendents and the school boards they serve, educational leaders and parents repeatedly cry out for a "true" career indicator which will honestly and fairly assess that students are on a career track that will provide them with the skills needed to be successful, aka WorkKeys, why does it have to be "adjusted" to fit the ACT outcomes that are purported as being "level" with a college prep student - back, again, to the proverbial apples and oranges.

Silver is the industry standard - as a stand alone score in a stand alone metric, why would a "resetting" of cut scores be needed? You probably bet money that career track students are

going to score better on a career track measure (in loo of a college prep measure), helping districts improve on their accountability ratings. But, this seems to be thought of as bad - or maybe, inaccurate, by the State Board - why? Who is not to benefit from accurately measuring students - because this is what we would finally be doing as a state, measuring students using a more accurate measure of career readiness.

Mr. Burrows - I highly encourage our state's Board to measure career readiness accurately using a Silver level on the WorkKeys assessment as a stand alone metric to measure student's readiness to enter the workplace.

Sincerely,

David Adams
Principal
Beechwood Elementary
601 500-0219
David Adams
Principal
Beechwood Elementary
601 500-0219

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Vicksburg Warren School District
1500 Mission 66
Vicksburg, MS 39182
601-638-5122

From: [Kelli A. Herrin](#)
To: [Accreditation Shared](#)
Subject: WorkKeys Accountability System Change; Public Comment
Date: Thursday, March 25, 2021 12:35:45 PM

Mr. Alan Burrow, Executive Director
District and School Performance
Mississippi Department of Education
accreditation@mdek12.org

Dear Mr. Burrow,

Please accept these public comments, submitted on behalf of The Pearl River County's Career and Technical Education Directors regarding the State Board of Education's (SBE's) amended position on the addition of the WorkKeys assessment as an indicator of success in the College-and-Career-Readiness (CCR) Component of the Statewide Accountability System.

We fully support the addition of the WorkKeys assessment requirement of the Silver-level score for the CCR component; however, we do not support the addition of students' obtaining a national certification in order to meet accountability. Our areas of concern are included in the following:

- Lack of national certification for many CTE programs including Business/Marketing/Finance Architecture/Drafting, Engineering, Teacher Academy, Digital Media Technology, Agriculture & Environmental Science & Technology.
- Limited availability of CTE slots at some CTE centers which is exacerbated by the lack of funding for new teacher units and programs that offer national certifications.
- Negative stereotyping of CTE students. The educators and businesses in our state have worked hard to change the perception of Career and Technical Education, which was once known as Vocational Education.
- CTE students are on a career prep pathway and not a college prep pathway; therefore, they should not be held to the college readiness benchmarks, but to a stand alone Silver-level score on the WorkKeys.
- If college bound students are required to meet certain scores on the ACT, then career pathway students should be allowed to meet a Silver-level on the WorkKeys as their

stand alone career readiness indicator. The ACT is not an indicator of career readiness, however Workkeys is.

Sincerely,

Kelli Herrin

Pearl River County School District, Career and Technical Education Director

Jill Smith

Picayune School District, Career and Technical Education Director

Keri Smith

Poplarville School District, Career and Technical Education Director

"Training Tomorrow's Workforce Today."

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From: [Alexandra Melnick](#)
To: [Accreditation Shared](#)
Subject: Work Keys Comments
Date: Thursday, March 25, 2021 1:30:06 PM

Dear Mr. Burrow,

I hope this email finds you well! I am writing today as an educator, and as a citizen of Mississippi. I am against the modification of the WorkKeys rules currently being considered by the State Board of Education (SBE) despite being in overall favor of assign to Work Keys to the Statewide Accountability System.

I believe it is inequitable, reinforces negative stereotypes about the career tech track, and ignores recommendations of business and industry regarding appropriate career-readiness indicators.

Alexandra Melnick
Writer & Curriculum Consultant

From: [Gwyn Russell](#)
To: [Accreditation Shared](#)
Subject: Attn: Mr. Alan Burrow
Date: Thursday, March 25, 2021 3:03:35 PM

I am in favor of the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. I believe it is needful and beneficial for our students.

Sent from my iPhone

From: [Mary Bryan Barksdale](#)
To: [Accreditation Shared](#)
Cc: [Rosemary Aultman](#); [Angela Bass](#); [Carey Wright](#); [Ronnie McGehee](#); [Karen Elam](#); [Glen East](#); [Amy Zhang](#); [Omar Jamil](#)
Subject: Public Comments for Submission to the State Board of Education
Date: Thursday, March 25, 2021 4:42:43 PM
Attachments: [SBEPublicComments.pdf](#)

Good evening Mr. Burrow,

I hope this email finds you well! Attached to this email you will find my public comments regarding the proposed changes to the WorkKeys addition into the CCR component of the Statewide Accountability System. I want to thank you and the Board for your consideration of my comments and for your concern on the matter.

Thank you very much,
Mary Bryan Barksdale

March 25, 2021

Mr. Alan Burrow, Executive Director
District and School Performance
Mississippi Department of Education
accreditation@mdek12.org

Dear members of the State Board of Education:

I am writing in response to the request for public comments leading up to the Friday meeting of the State Board of Education. These comments pertain to the inclusion of the WorkKeys assessment into the state's accountability model for school districts. I first want to express my thanks to the Board for being open to public comments and for giving the comments you receive a listening ear. I also am very much in favor of the adoption of the WorkKeys assessment into our school districts' CCR ratings, so thank you for your work on this issue. This adoption, if done properly, will make good progress in aligning our use of assessments and accreditation ratings with our public school system's binary missions of either preparing students for continuing education or for the workforce.

The proposed changes that are currently in front of the SBE, namely to exclude the Silver NCRC as a stand-alone measure for career-readiness, is disingenuous to the reasoning put forward by the Mississippi Department of Education for including the WorkKeys assessment in the first place. The public's understanding of the reasoning behind this inclusion was that it will finally take into account a metric for career readiness, treating students on a career track more equitably with those on a college track. The effects of this proposed change before the Board would counteract some of the good of the overall plan by a) ignoring the industry sector's widespread approval of a Silver NCRC as a stand-alone indicator for career readiness, b) supporting inequitable features already in place in the current system and c) continuing to treat college and career readiness as comparable, not binary goals of a public education. It therefore perpetuates the problem that this adoption at its outset is trying to address.

When we as community members say that we want our public schools to prepare students to either further their education or to join the workforce, we must give schools an honest shot at showing they are successful in meeting these binary goals. The proposition to require students who earn a Silver NCRC to either complete a career pathway track through a career technical center or to gain industry certification does not give schools an honest shot at proving a successful mission. Instead, these requirements place undue burden on schools (and students at those schools) that are not able to provide industry certification and/or do not have access to a complete career pathway through a career-technical center. This would in effect continue the pattern of punishing students who are not pursuing a college degree and punish those schools with higher percentages of career-track students.

The additional requirements that would be placed on earners of a Silver NCRC do not remedy the problem of a misaligned accreditation with the public school mission. Instead, they continue to treat college and career readiness as similar goals, when in reality they are binary. The purported reasoning behind the extra steps that would need to accompany a Silver NCRC is the

lesser rigor of the WorkKeys assessment compared to the ACT. Again, these tests are used to assess different, not comparable, types of readiness. When the MDE says that using the Silver NCRC would “lower standards of performance,” they are measuring the WorkKeys assessment against the current ACT accountability model, and in performing this apples-to-oranges comparison, they are bringing in biases about the value (and the best way to assess) a career versus a college track. Here I want to reiterate what Nancy Loomer said in her submission of public comments to you: “...because the improved ratings would be due to a more accurate measure of career readiness, the ratings will likely be significantly more accurate than previous ratings have been. A reset of cut scores to artificially deflate ratings to bring them into line with a previously flawed CCR measure would be a disservice to students, teachers, and communities statewide.”

Results of these two tests—WorkKeys and ACT—are only useful as indicators for the MDE’s purposes of accreditation when we: a) do not place unfair burdens on the schools and students who are more heavily career-track and b) stop assessing the rigor of these tests by side-by-side comparisons and instead look through the value-judgement lenses that colleges and the industry sector have already given us.

Thank you for your careful consideration of this matter and for your dedication to the vision of a continuously more equitable state public school system.

Sincerely,
Mary Bryan Barksdale

A handwritten signature in cursive script, appearing to read "Mary Bryan Barksdale".

From: [Julie Newton](#)
To: [Accreditation Shared](#)
Subject: WorkKeys
Date: Friday, March 26, 2021 6:56:27 AM

With our mission/standards being both College and **Career** Readiness, **I am in favor** of the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. My decision is based on the need to provide pathways to success for all students. As educators, it is imperative that we provide opportunities and avenues for **ALL** Students in Mississippi.

Thank you,
Julie Newton, Ed. S., NBCC, NCC
New Albany Middle School Counselor
400 Apple Street
New Albany, MS 38652
Phone (662) 534-1820
Fax (662) 534-1819

From: [Melanie Shannon](#)
To: [Accreditation Shared](#)
Subject: WorkKeys Assessment
Date: Friday, March 26, 2021 8:09:19 AM

Good Morning:

Our district's vision is "Preparing ALL for Success". It is important for our school district and it is important for Mississippi. It is necessary that we provide opportunities and avenues for all students in Mississippi. It is necessary that we develop a productive workforce for our state. **I am in favor of** the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students.

Thank you

--

Melanie Shannon
Coordinator
New Albany Schools
"Preparing ALL for Success"



March 26, 2021

Mr. Alan Burrow, Executive Director
District and School Performance
Mississippi Department of Education
accreditation@mdek12.org

Dear Mr. Burrow,

Please accept my comments concerning the State Board of Education's position on the Workkeys assessment as an indicator of success in the College and Career Readiness component of the Statewide Accountability System.

I strongly support the addition of the Workkeys assessment as an indicator of CCR success. However, the proposal to include a national certification as part of the CCR component is flawed in several ways.

1. It is unfair to those students taking career tech courses in which a national certification is not in place.
2. The Silver Level score is the standard by which business and industry determine career readiness.
3. Career track students are not on the college prep track and should not be held to the college readiness benchmarks.

The Workkeys assessment is a better indicator of career readiness than the ACT, as the ACT is strictly academic in nature and though it is a very good indicator of college readiness, the ACT falls short when used to assess career readiness.

A search of definitions for "Career Readiness" most often returns a definition of "students who are considered to be equipped with the knowledge and skills deemed to be essential for success in the modern workforce, or (2) the kinds of educational programs and learning opportunities that lead to improved workforce preparation.

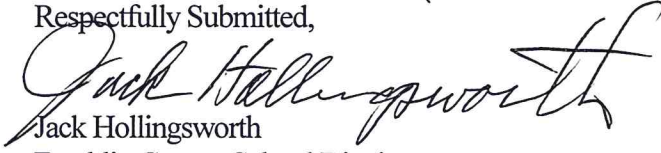
The Counsel of Chief School State Officers says this about Career Readiness, "Equitable career readiness K-12 programming provides all students with the knowledge, skills, and experiences that will enable them to lead productive and fulfilling lives.

None of the definitions include any mention of a student having to obtain a National Industry Certification while in high school in order to be considered Career Ready.

I urge the State Board of Education to modify the business rules as they relate to the College and Career Readiness standard to allow a score of Silver Level on the Workkeys assessment to be considered

successful for students enrolled in or who have completed a CTE class. The Workkeys Silver Level should stand alone as the CCR benchmark for CTE students.

Respectfully Submitted,

A handwritten signature in black ink, reading "Jack Hollingsworth". The signature is written in a cursive style with a large, stylized "J" and "H".

Jack Hollingsworth

Franklin County School District

From: [Chad Shealy](#)
To: [Accreditation Shared](#)
Subject: APA response
Date: Friday, March 26, 2021 10:19:56 AM

I applaud the effort to place the ACT WorkKeys into the model under the college and career block of the accountability model. For too long we've ignored the career component that is so essential for life success and statewide prosperity. Everyone may not go to college but everyone will go to work. Career prepared seems to be painted as a lesser choice than college prepared and that is not the case.

The inclusion of a career preparedness indicator in the model has been an battle for the last 4 years from multiple districts and communities. Our industry partners and legislators agree that a score of Silver on the ACT WorkKeys is a benchmark of that readiness. In reviewing the recommendation for the policy change, MDE's recommendation seems to indicate that "rigor" for a student preparing for a career must match the "rigor" of the ACT. However, that reasoning is flawed as preparedness in those respective tracks are measuring different knowledge/skills. We are encouraged that the MDE appears to recognize that the ACT is a poor career preparedness assessment. But, to demand "[academic] rigor" as a standard for measuring career preparedness by maintaining that "rigor" on the two tracks must be equal (though I am not sure the standard one would use to determine such) is using the same poor tool for evaluation of career readiness.

We have all recognized that college is not for everyone. If it is the job of Mississippi schools to prepare students for life, then we must measure success of those that choose different tracks in a way consistent with the requirements/goals/standards for those tracks. In the Vicksburg Warren School District, we have identified the 4Es--4 Exit Strategies from which the students choose. These include Enrollment in College, Employment (Career), Enlistment in Military, or Entrepreneur (starting one's own business). Certainly, the criteria for readiness is not the same across the board. Focus on "rigor" clouds the issue of readiness, reinforces negative stereotypes of the career tech track and ignores the recommendation of business and industry regarding the appropriate career-readiness indicator.

The SBE proposes to require career track students who score at the Silver level on WorkKeys also to obtain an industry certification or career pathway to be counted as successful in the accountability system. Gold- and Platinum-level scores would stand alone as career-readiness indicators. This is at odds with the recommendation of the business community and the MDE's Accountability Task Force that the national industry standard Silver-level score on the WorkKeys assessment be the stand-alone benchmark of success for career track students, just as the ACT national

standard is the stand-alone benchmark of success for college prep students.

It is important to note that not all school districts have their own CTE programs. Some participate in coalitions, through which their students take CTE classes on other school districts' campuses via coalition agreements that cap the number of CTE slots allowed for out-of-district students. Districts with their own CTE programs have no such limits, making completion of a career pathway an unfair requirement. Not all career tech areas have an industry certification, negating certification as a means of compensating for inequitable access to a career pathway.

In addition the ACT readiness requires no college classes to be attained to count as a stand alone indicator. It is not equitable to require additional requirements of classes in conjunction with the industry standard of Silver. I completely understand the importance of CTE, and the VWSD has one of the highest participants of Dual Credit CTE in MS, but the Silver level should stand on it's on due to the fact that everyone does not have equality as it relates to access to those classes because of availability.

We believe the SBE proposal is flawed in at least three important ways:

It is inequitable, penalizing districts with a high percent of career track students, particularly districts that do not have their own career tech programs

It reinforces negative stereotypes of the career tech track

It ignores the recommendation of districts, legislators, and business/industry regarding the appropriate career-readiness indicator

Currently, the CCR component includes no assessment that measures the effectiveness with which school districts prepare students on a career track. All students are evaluated using the ACT assessment, a college-readiness indicator, as a measure of CCR success.

The Vicksburg Warren School District supports the inclusion of the WorkKeys assessment in the College- and Career-Readiness component of the Statewide Accountability System as a measure of career-readiness for students who are enrolled in or have completed at least one CTE course, and the use of a stand-alone Silver-level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability System. We believe student that meets either a Silver level on ACT WorkKeys, or ACT College readiness standard should count equally in that block. We do not support the changes that have been proposed by MDE that include addition industry credentials.

Chad Shealy
VWSD Superintendent
"Developing the Leaders of Tomorrow, Today"

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Vicksburg Warren School District

1500 Mission 66

Vicksburg, MS 39182

601-638-5122

From: [Dr. Ken Barron](#)
To: [Accreditation Shared](#)
Subject: Request for comment on Workkeys Assessment
Date: Friday, March 26, 2021 11:16:12 AM

The move to include ACT Workkeys into the state accountability model is outstanding and long past due. We are in dire need of having a "career" portion of the College and CAREER Readiness portion of the model. Including ACT Workkeys has been a topic that has been discussed favorably by educational administrators for many years and I am encouraged that MDE is finally listening to us at least in some capacity.

In considering the method to gauge career readiness and consulting with those in the business world as well as our legislators, the prevailing agreement is a score of Silver on the Workkeys assessment demonstrates the success level that is necessary. It is our position that the Silver Score should be the stand alone requirement, which is in agreement with MDE's Accountability Task Force and that of the business community.

Any additional requirements place an unfair burden on districts such as ours to craft a plan to obtain industry certification. We have worked since my arrival to add CTE options for our students but have been met with no support from MDE. To require my district to obtain one of these certifications with no valid option for our students to obtain them is yet another embarrassment to the accountability model.

We support the inclusion of the Workkeys assessment and a score of silver being the rate which measures success with no additional requirements. We do not support MDE's flawed perspective and misinformation that there is a need for additional requirements.

--

Ken Barron, Ed. D.

Superintendent Yazoo County School District

Yazoo County Schools exist to create next generation leaders who pursue purposeful, productive lives.

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From: [Curt Langley](#)
To: [Accreditation Shared](#)
Date: Friday, March 26, 2021 11:39:03 AM

It is imperative that we provide opportunities and avenues for all Students in Mississippi. Therefore, **I am in favor of** the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. My decision is based on the need to provide pathways to success for all students.

--

Curt Langley
New Albany Schools
662-534-1805

From: [Sabrina Hall](#)
To: [Accreditation Shared](#)
Date: Friday, March 26, 2021 12:41:22 PM

Mr. Burrow,

I feel that it is extremely important that we implement the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career-track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. As the mother of a special education student as well as the case manager for our special services department, it is imperative that we provide opportunities for ALL students in Mississippi.

--

[Sabrina Hall, M.Ed.](#)
[Case Manager](#)
[New Albany School District](#)

From: [Amy Welborn](#)
To: [Accreditation Shared](#)
Subject: WorkKeys
Date: Friday, March 26, 2021 12:58:53 PM

Dear Mr. Burrow,

It is imperative that we provide opportunities and avenues for all Students in Mississippi. Therefore, **I am in favor of** the national industry standard Silver-level score on the WorkKeys assessment as the stand-alone benchmark of success for career track students, just as the ACT national standard is the stand-alone benchmark of success for college prep students. My decision is based on the need to provide pathways to success for all students.

Thank you,
Amy Dobbs Welborn
School Test Coordinator
New Albany High School
New Albany, MS

From: [Scott Waller](#)
To: [Accreditation Shared](#)
Subject: MEC Comment on ACT WorkKeys importance in statewide accountability system
Date: Friday, March 26, 2021 3:59:51 PM
Attachments: [MEC Comment on ACT WorkKeys.pdf](#)
[Emerging Workforce revised 1.25.21.pdf](#)
[Endeavor-Report-12.18.pdf](#)

Mr. Burrow,

Below are comments from the Mississippi Economic Council – the State Chamber of Commerce concerning ACT WorkKeys® importance in the statewide accountability system.

I have also included a PDF attachment of the comment. The MEC policy position on ACT WorkKeys® and MEC’s Workforce and Economic Initiative report “Endeavor” are attached.

Please share with members of the State Board of Education.

Should you have any questions, I can be reached at 601-540-2970.

Thanks,
Scott

Scott Waller
President & CEO
Mississippi Economic Council
Mobile: 601-540-2970

**The Mississippi Economic Council supports the inclusion of the
Silver Level ACT WorkKeys® as a stand-alone component in the
College- and Career-Readiness portion of the Statewide
Accountability System**

To Members of the Mississippi Board of Education:

As the State Chamber of Commerce, the Mississippi Economic Council understands the importance of both college and career readiness for Mississippi's High School Students. In fact, over the past few years, we have worked very hard to stress how vital career and technical education is to employers across the state. At the same time, touting the tremendous academic success we see in our K-12 system.

Following MEC's "Endeavor" report released in early 2018, MEC worked with officials from the Mississippi Department of Education to determine how to best approach meeting the business community's need for academic skills and practical skills that lead to success in today's workforce.

With more than 60 percent of jobs today requiring some form of post-secondary education, it was determined that obtaining the silver level benchmark provided by ACT WorkKeys® would offer significant benefits to all high school students. Both the ACT® and ACT WorkKeys® are crucial tools in helping students assess their strengths to succeed after high school completion.

"Endeavor" further points out that of the jobs that require post-secondary education, approximately 50 percent require a four-year college degree or higher. In comparison, the other 50 percent only require industry certification or a two-year Associate Degree. This makes providing the ACT WorkKeys® assessment vital for high school students in Mississippi. It will provide a baseline for employers and allow students to move into high-paying, long-term careers much faster.

MEC's official policy position, which was adopted before the 2019 Legislative Session, outlines that both assessments provide benefits to students, the education system, and Mississippi's economic competitiveness.

Unfortunately, the Mississippi Department of Education's insistence on placing additional requirements on the use of the ACT WorkKeys® in the state's accountability models undermines its purpose to help students move quickly into jobs available in Mississippi today.

Also, when MEC was working with the department in the early stages of developing our policy position, it was made very clear that the purpose of the ACT® is to measure a high school student's readiness for college, provide colleges with one common data point, and not be perceived as an assessment to measure academic rigor.

It is essential to understand the ACT WorkKeys® provides a common data measure of work readiness – does the student have the practical skills necessary to learn the specific skills to succeed in the workplace. Like the ACT, it should not be perceived as an assessment to measure academic rigor. However, it does provide students with a National Career Readiness Certification (NCRC).

The ACT® and ACT WorkKeys® are two different measures. Trying to equate the ACT WorkKeys® to the academic equivalency of the ACT® is like comparing apples and oranges, minimizing the accomplishment of our students.

Many large companies in Mississippi already rely on the Silver Level NCRC as a benchmark for employment. Smaller companies are beginning to understand the value this assessment provides. MEC will continue to work with our member businesses to ensure they know the value of ACT WorkKeys®.

In a briefing by Continental Tire on March 17, company officials pointed out how essential a Silver Level NCRC has become in assessing potential employees. The

company requires applicants to have at least a Silver Level score on ACT WorkKeys®. Yokohama Tire required the Silver Level ACT WorkKeys® before anyone could apply for employment, even for those positions that required a four-year college degree. In a meeting at Nissan in early December, company officials said they are now using the ACT WorkKeys® as a benchmark for future employees, and Toyota is doing the same.

The Accountability Task Force's recommendation was for Silver Level ACT WorkKeys® to be used in the College- and Career-Readiness component of the Statewide Accountability System to measure career-readiness. Unfortunately, the "out-of-state" Technical Advisory Committee decided to view this from only an academic perspective, adding the additional requirement of CTE completion or a certification. The Mississippi Department of Education has now equated Gold Level ACT WorkKeys® as an academic equivalent to the ACT®.

The Mississippi Economic Council urges the Mississippi State Board of Education to adopt the Accountability Task Force's recommendation and use Silver Level ACT WorkKeys® as a stand-alone component. We believe the practitioners who serve on the task force have the hands-on experience to understand how this assessment should be utilized.

It is time to be bold and help all students receive a career readiness certification and give the NCRC the value it deserves. Allowing students to demonstrate they have the practical skills necessary to succeed, will assure Mississippi employers our graduates are ready to take the next step and learn the specific skills needed for a successful career here at home.

Thank you for your dedication to improving education in Mississippi. MEC stands ready to assist in any way possible to ensure all Mississippi students are successful.



Scott Waller
President & CEO
Mississippi Economic Council
248 E. Capitol Street, Suite 940
Jackson MS 39201
P.O. Box 23276
Jackson, MS 39225-3276
Phone: 601-969-4411 or 1-800-748-7626
Mobile: 601-540-2970

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.

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 ~~as~~ 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.
~~25.7.1 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.