

OFFICE OF CHIEF ACCOUNTABILITY OFFICER
Summary of State Board of Education Agenda Items
April 21, 2022

OFFICE OF DISTRICT AND SCHOOL PERFORMANCE

01. Action: Revise Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI) [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]
- 01.A. Action: Withdrawal of Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the March 17, 2022, approval to begin the Administrative Procedures Act process to revise the business rules of the Mississippi Statewide Accountability System for school year 2021-2022 [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]
(Has cleared the Administrative Procedures Act process with public comments)
- 01.B. Action: Approval of a temporary rule and to begin the Administrative Procedures Act process: To revise Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI) [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]

Background Information: The MDE and the Technical Advisory Committee (TAC) determined that adjustments to accountability calculations are necessary for banked, high school End-of-Course (EOC) assessments for the 2021-2022 school year. In this case, the Academic Achievement indicator may be missing assessment scores from the 2019-2020 school year, either for use in growth, proficiency, or both measures. Also, changes are necessary for exit criteria for school improvement designations.

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: None

OFFICE OF CHIEF ACCOUNTABILITY OFFICER
Summary of State Board of Education Agenda Items
April 21, 2022

OFFICE OF DISTRICT AND SCHOOL PERFORMANCE

- 01.A. Action: Withdrawal of Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the March 17, 2022, approval to begin the Administrative Procedures Act process to revise the business rules of the Mississippi Statewide Accountability System for school year 2021-2022 [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]
(Has cleared the Administrative Procedures Act process with public comments)

Background Information: The MDE and the Technical Advisory Committee (TAC) determined that adjustments to accountability calculations are necessary for banked, high school End-of-Course (EOC) assessments for the 2021-2022 school year. In this case, the Academic Achievement indicator may be missing assessment scores from the 2019-2020 school year, either for use in growth, proficiency, or both measures. Also, changes are necessary for exit criteria for school improvement designations.

On March 17, 2022, the State Board of Education (SBE) granted approval to begin the APA process to revise the business rules of the Mississippi Statewide Accountability System to include proposed revisions for the 2021-2022 school year for banked, high school EOC assessments and school improvement designations.

The public comment period was open March 18, 2022, through 5:00 p.m., April 11, 2022. The MDE received 34 public comments. The MDE's proposal and the CSA's approval to amend the initial recommendation submitted to the SBE on March 17, 2022, is substantial and will require the MDE to begin a new Administrative Procedures Act process to solicit public comments.

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 10,
Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11,
Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and
Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools
(ATSI).

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
1	<p>Cameron Lea Gates, Former Teacher</p> <p>I no longer believe in public, private or parochial education. It's all designed to destroy young people's minds and punish the few decent humans left on Earth that would take on caring for up to 600 different children in one week. That's right; 6 classes a day, 5 days a week with up to 35 individuals per class and all their personalities, allergies and learning disorders, for a district that claims to have no money for supplies, a working copy machine, toilet paper, sanitizer, etc.</p> <p>It's all an organized crime racket and you are their mole. Where does all the money go? It's obviously not staying in Coahoma county.</p> <p>This isn't about a real standardized test or ranking system - this is really about creating a new money funnel to sap resources away from districts.</p>	Off topic
2	<p>Superintendents of the North MS RESA</p> <p>Superintendents are now discovering that the ninth-grade scores during the "hold harmless" school year will count towards this year's accountability ratings. We understand that the US Department of Education plays a major role in this decision, but that does not negate the responsibility of our state department to support our teachers and schools in attempting to secure a workable solution for everyone. We, as a united group of superintendents, ask that the impact data be made available to the state board, the legislature, and individual districts regarding the banking of scores. Counting the scores from last year's</p>	<p>The MDE did not recommend the exclusion of any data from accountability measures for the 2020-2021 school year, because the department was not aware of state and federal accountability requirements for the 2021-2022 school year at that time.</p> <p>Although graduation requirements related to high school end-of-course assessments, promotion requirements related to the Literacy Based Promotion Act, and</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>ninth-graders is also discriminatory. Schools and districts were advised by the Mississippi Department of Health to go virtual during the peak of the pandemic.</p> <p>Virtual education more adversely affected those students in poverty than those in affluent school districts. The aforementioned impact data will bear that out.</p> <p>Secondly, using legacy growth for those who tested as ninth-graders last year is another deterrent for our teachers. In using legacy growth, a student's ninth-grade hold-harmless score will be compared with their pre-pandemic seventh-grade scores. This practice is extremely problematic. Students' pre-pandemic scores cannot reliably be compared with a post-pandemic score. Too much instruction was lost during the pandemic. Again, this situation adversely affects those students in poverty more than the non-poverty students. We are asking that pre-pandemic/post-pandemic growth impact data be provided to all applicable parties as well.</p> <p>Finally, assigning letter grades using scores from assessments taken during a pandemic-riddled school year does not reliably convey the quality of each school and district in Mississippi. The aforementioned impact data should bear that out. Almost all high schools will inevitably drop because of the inclusion of last year's scores in the calculations.</p>	<p>accountability letter grade assignments were waived in the 2020-2021 school year, no waivers were granted for accountability for the 2021-2022 school year.</p> <p>Growth and proficiency calculations will reflect the impact of the pandemic, as expected.</p> <p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p> <p>Effective with the 2013-2014 school year, Miss. Code Ann. §37-17-6(5)(a) requires the State Department of Education to implement a single "A" through "F" school and school district accountability system.</p>
3	<p>Shane Homan, Community Development Foundation</p> <p>I believe the current A-F bumper sticker labeling within the accountability system is having devastating consequences on our Mississippi community's ability to grow.</p> <p>The current system creates gamification and labeling our school districts and the communities they serve. Gamification meaning that "A" districts are limited to the</p>	<p>Off topic</p> <p>Effective with the 2013-2014 school year, Miss. Code Ann. §37-17-6(5)(a) requires the State Department of Education to implement a</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>top 20% or so of the total school districts regardless of actual test scores and the bottom 10-15% of total school districts will always be labeled as a “F” district regardless of actual test scores. The current labeling system is a moving target with nontransparent variables to manipulate the segregation of “A-F” districts that MDE wants to label. The statewide test results, if mapped in combination with demographics and/or free and reduced lunch assistance, creates a parallel labeling of privileged versus diverse and/or underserved communities.</p> <p>As a parent I have experienced that this labeling system has restructured our schools and teachers’ sole purpose and importance to teaching a test versus learning. The trickle-down effect of this system is that our kids are also labeled as a good, or bad student, based on one test/one day out of a year versus how they performed in the classroom all year.</p> <p>I strongly encourage MDE to reconsider their current accountability system, but at the very least to eliminate the bumper sticker labeling it is giving their districts and indirectly the communities they serve.</p>	<p>single “A” through “F” school and school district accountability system.</p> <p>Accountability standards (cut scores) do not change from year to year, and letter grade assignments are not limited to a certain percentage of schools or districts.</p>
4	<p>Ryan Kuykendall, Director of Accountability & Research, DeSoto County Schools</p> <p>The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.</p> <p>The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and</p>	<p>In support pf the proposed changes.</p> <p>Data regarding the performance of students during the pandemic and following the pandemic is comparable in regard to the assessment and the use of 7th grade prior scores. The MDE recognizes and expects that the impact of the pandemic will be seen in accountability calculations this year and likely in the next few years.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward.</p> <p>Based on what was approved by the state board to go out for APA, high school growth will be comparing post-pandemic (2021-2022) scores to pre-pandemic (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing in-pandemic (2020-2021) scores to pre-pandemic (2018-2019) scores in most cases for Algebra I. And the pre-pandemic grade level will be changed in most cases from 8th grade to 7th grade which will produce drastically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math.</p> <p>Questions of communication: How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?</p> <p>...we have tried “lack of common sense” rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.</p> <p>Inequity across the state and unintended consequences going forward:</p>	<p>Growth and proficiency calculations will reflect the impact of the pandemic, as expected.</p> <p>Although 8th grade math has an average of 6.5% fewer students scoring proficient than 7th grade math, growth is calculated for students at all proficiency levels. The MDE reviewed a comparison of 7th grade to 9th grade growth for students pre-pandemic and found that the percentage of students showing growth was only 3.88 percentage points lower than a growth calculation from 8th grade to 9th grade. Therefore, the MDE does not consider the difference to be significant.</p> <p>The MDE will assist districts by providing communication resources regarding the impact of the pandemic on student learning and the resulting impact to accountability measures.</p> <p>The MDE always makes decisions with careful consultation with stakeholders and technical advisors and works to advance policy in the best interest of all students.</p> <p>The MDE recognizes the disparate impact of the pandemic on students.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>2021-2022 High School Low Performing Growth will suffer the most compared to 2018- 2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021- 2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 “in-pandemic” scores compared to “pre-pandemic” higher 7th grade scores will make up almost all of that category.</p> <p>If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are “competing” with each other as letter grade cuts get reset.</p> <p>Part of this proposal is that schools/districts with middle school Algebra I will have students that were enrolled in 2019-2020 in Algebra I have their 2018-2019 8th grade math proficiency and growth pre-pandemic scores counted in the numerator while schools without middle school Algebra I will NOT have their 9th grade 2018-2019 and 2019-2020 9th grade scores counted in the numerator. This will be a MAJOR advantage for schools/districts with middle school Algebra I against those without middle school Algebra I.</p> <p>Better options presented in the Accountability Task Force meetings: Use banked 2018-2019 and fall 2019-2020 scores in place of 2020-2021 banked scores Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force</p>	<p>The proposed adjustments to accountability are made to be as consistent as possible with current business rules.</p> <p>Because the MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021, there is a recommendation to eliminate the previous proposal.</p> <p>The MDE recommends minimal use of pre-pandemic data that may mute the impact of the pandemic on accountability data.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>meetings. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are now. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales.</p> <p>No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we “cannot calculate it with reliability.”</p> <p>All districts and all schools should have their 2018-2019 letter grade and their 2021-2022 letter grade published and the higher of the two letter grades should become the official letter grade due to everything that has been said in this statement. The USDE does not mandate letter grades. We would report to them the 2021-2022 data.</p>	<p>Although banking will need to continue to comply with federal assessment requirements, the MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p> <p>Miss. Code Ann §37-17-6(5)(c)(ii) requires an individual student growth component be included in the Mississippi Statewide Accountability System.</p> <p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>
5	<p>Todd English, Superintendent, Booneville School District</p> <p>There are several problems, however, with the current recommendations. First, using skewed data from the current year is incomparable to previous years and the other scales for the current year. The students we have this year, are not the same mentally and emotionally as they were pre-pandemic. Comparing the two will produce data which is not valid, nor reliable. There’s also the issue of the 7th grade math scores being consistently higher in Mississippi than the 8th grade math scores. Growth will suffer at the high school levels through no fault of the high schools.</p> <p>Secondly, it is not beyond the realm of possibility that the 1,000-point scales for schools and districts will have to temporarily be reset. By comparing pre-pandemic scores</p>	<p>Data regarding the performance of students during the pandemic and following the pandemic is comparable in regard to the assessment and the use of 7th grade prior scores. The MDE recognizes and expects that the impact of the pandemic will be seen in accountability calculations this year and likely in the next few years. Although the data may reflect the impact of the pandemic, this does not make it invalid or unreliable.</p> <p>The MDE is not recommending the resetting of cut scores. Although graduation requirements related to end-of-course assessments,</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>to post-pandemic scores AND including banked scores from last year, during a “hold harmless” year where the students did not have to pass the subject area tests to graduate, score at the high school and district levels could plummet up to 300 points. Scales of the 700-point schools would likely need to be temporarily reset as well. Since growth is worth 400 of the 700 total points, the scores at those schools are likely to be artificially inflated for the upcoming year and significantly deflated the following year.</p> <p>Finally, counting accountability scores that are artificially low or artificially high can have a negative effect on teacher morale. Scores will significantly fluctuate the next two years.</p>	<p>promotion requirements related to the Literacy Based Promotion Act, and accountability letter grade assignments were waived in the 2020-2021 school year, no waivers were granted for accountability for the 2021-2022 school year.</p>
6	<p>Tyler Hansford, Superintendent, Union Public School District</p> <p>Comparing banked 10th scores to a student's score from 7th grade is not reliable data. The 7th grade tests are historically more simple than the 8th grade tests and certainly the high school tests. In our district, proficiency at the high school was near an all-time high despite the pandemic, but the growth calculation will not reflect that because of the comparison to 7th-grade scores. We stand to lose between 100 and 150 points in growth at the high school if scores are calculated like MDE is proposing. That is not an accurate reflection of what is going on. I know MANY other schools face the same fate. This is NOT what is best for kids, and this is NOT what is best for communities. There are already enough issues going on with this accountability model that need to be fixed. Playing a game like this with an already flawed model is just bad business.</p>	<p>Although 8th grade math has an average of 6.5% fewer students scoring proficient than 7th grade math, growth is calculated for students at all proficiency levels. The MDE reviewed a comparison of 7th grade to 9th grade growth for students pre-pandemic and found that the percentage of students showing growth was only 3.88 percentage points lower than a growth calculation from 8th grade to 9th grade. Therefore, the MDE does not consider the difference to be significant.</p>
7	<p>Unknown (Mailed)</p> <p>I am in total agreement that students in the state of Mississippi should participate in statewide testing.</p>	<p>Effective with the 2013-2014 school year, Miss. Code Ann. §37-17-6(5)(a) requires the</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>However, due to the disruption in schooling and state assessments for two consecutive years, I feel that an adjustment must be made to the accountability system for this current school year and for 2022-2023.</p> <p>I understand that the U.S. Department of Education (USED) is currently requiring states to resume their accountability systems and report, however, they are not requiring states to issue letter grades. In fact, the USED is allowing the states to make adjustments. As a state, we need to take advantage of this opportunity. Please request a one-year addendum that is in the best interest of all students in the state.</p> <p>Again, students should test, but please do not assign letter grades this year. Our students missed a great deal of school in 20-21 and this year should be used as a baseline year. Gather the data and report it to the USED, but do not issue letter grades.</p> <p>Finally, regarding high schools, it is not fair to pull scores from 18-19 in order to calculate growth. Since growth cannot be calculated for the high schools, now is your chance to make adjustments to the model that will benefit all schools in the state.</p> <p>In my opinion, an adjustment must be made to the accountability system for this school year and next school year. It is the right thing to do.</p>	<p>State Department of Education to implement a single “A” through “F” school and school district accountability system.</p> <p>The USED is allowing states to make adjustments to account for missing data or data that is incomplete; however, the USED has been clear that accountability measures shall resume.</p> <p>Effective with the 2013-2014 school year, Miss. Code Ann. §37-17-6(5)(a) requires the State Department of Education to implement a single “A” through “F” school and school district accountability system.</p> <p>The MDE has analyzed the proposed growth methodology and determined that there is not significant variability in using the skip-year approach.</p> <p>The MDE is recommending an adjustment as necessary to replace otherwise missing data, as required by federal and state law.</p>
8	<p>Kelleigh Broussard, Assistant Superintendent, Long Beach School District</p> <p>In regards to the business rules pertaining to banking scores for EOC for courses taken before 10th grade, it would be unfair to use 2021 banked scores based on the following:</p>	

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>1. 2021 was a year wherein educators across the state faced a pandemic resulting in extended periods of disrupted learning. In January of 2021, MDE sent out correspondence stating that it would be a year of grace. To turn around and now use that data to report proficiency and growth in 2022 would not be fair to students, teachers, principals, nor districts.</p> <p>2. To calculate growth using a proposed skip year concept is not stated in business rules. What is stated is that EOC cannot be excluded from growth calculations. The only reference to a 7th grade score is for those students who take Alg in 8th grade. So, if a business rule is going to now be written to address the gap for 2021 9th graders who took Alg. I based on their 2019 (7th grade) performance, why not write the rule to utilize legacy growth data? Legacy data would be much better than plugging in disconnected measures that will not measure genuine growth through vertical progression. It would be misleading to attempt this. While it would present a magnified impact of Covid, it would stem from a distortion of data that the public will not understand.</p> <p>Ideally, no 9th grade banked scores from 2021 should be utilized. This is the preference without hesitation. Rather, utilize 2022 9th grade scores to move forward in calculating growth measures, but if 9th grade scores from 2021 must be used, then combine it with legacy scores from 2019 for growth.</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p> <p>The USED is allowing states to make adjustments to account for missing data or data that is incomplete; however, the USED has been clear that accountability measures shall resume. Calculating skip-year growth for a students missing a prior year score will allow for growth to be calculated in accordance with federal and state law.</p> <p>The MDE does not recommend the use of legacy data in this manner, as it would not accurately reflect the impact of the pandemic on student performance.</p> <p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>
9	<p>Dr. Lundy Brantley, Superintendent, Neshoba County School District</p> <p>This year, we will have some of the best proficiency we have had along with CCR, Grad rate, history, acceleration etc. yet this method will cause us to go from a B to a D by no fault of our own.</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>The 7th grade math test is an easier test. The 7th grade math test is NOT an Algebra test. The growth is invalid. This will compare in-pandemic data vs much higher pre-pandemic data and had never been compared to skip year growth previously as at such a wide scale. This proposal does not give a year for some students to regain academic losses such as the grade 3-8 will be.</p> <p>Suggestions:</p> <ul style="list-style-type: none"> • Create a scale to send to USDOE with what is required to be sent. Use the same method as we did with PARCC and give the hold harmless for high schools but also show what the high school would have been. Allow the school/district to keep the higher of the two. • Ask the USDOE for a one-year amendment. I know this was presented in the Accountability Task Force meeting. B-2 on USDOE guidance. • Use only proficiency for schools that choose to do so. Use an equating method to adjust cut scores for ratings. Allow schools that want growth to use their growth • Use a bridge method- bridge the growth scores from 7th to high school. We made a bridge before, let's do it again. • Score equating- take your average 6th and 7th grade years and compare to past high school years and give the average. 	<p>Although 8th grade math has an average of 6.5% fewer students scoring proficient than 7th grade math, growth is calculated for students at all proficiency levels. The MDE reviewed a comparison of 7th grade to 9th grade growth for students pre-pandemic and found that the percentage of students showing growth was only 3.88 percentage points lower than a growth calculation from 8th grade to 9th grade. Therefore, the MDE does not consider the difference to be significant.</p> <p>The MDE does not recommend the continuation of 2018-2019 letter grade assignments.</p> <p>The USED is allowing states to make adjustments to account for missing data or data that is incomplete; however, the USED has been clear that accountability measures shall resume.</p> <p>Accountability measures must be applied consistently to all schools.</p> <p>The MDE does not recommend the use of legacy data in this manner, as it would not accurately reflect the impact of the pandemic on student performance.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
10	<p>Mrs. Charlotte Seals, Superintendent, Dr. Greg Paczak, Director of Research and Development, & Dr. Elizabeth Wells, Research and Development Analyst, Madison County School District</p> <p>Assessment results show that students perform better on 7th grade MAAP assessments than 8th grade MAAP assessments. Higher performance at the 7th grade level results in diminished opportunities for students to show growth to the Algebra I and English II EOC assessments.</p> <p>When comparisons are made between 7th grade and 8th grade, 7th grade has a greater percentage of students performing at the highest level than 8th grade for both years.</p> <p>At the high school level, students are faced with assessments that have an increased level of complexity based on the nature of the content. Meeting growth from the 8th grade to the Algebra I and English II EOC assessments presents a unique challenge in a typical pre-pandemic to pre-pandemic accountability cycle. However, if pre-pandemic 7th grade scores are used as the baseline for growth in comparison with in-pandemic scores, this creates a much greater challenge and undue burden on high schools.</p> <p>Possible Alternative Based on United States Department of Education guidance (B-3 and B-7), use the cohort grouping as outlined in the business rules. Remove the four growth components when calculating accountability at the high school level. This would result in high schools being on a 600-point scale.</p>	<p>Although 8th grade math has an average of 6.5% fewer students scoring proficient than 7th grade math, growth is calculated for students at all proficiency levels. The MDE reviewed a comparison of 7th grade to 9th grade growth for students pre-pandemic and found that the percentage of students showing growth was only 3.88 percentage points lower than a growth calculation from 8th grade to 9th grade. Therefore, the MDE does not consider the difference to be significant.</p> <p>State law requires a measure of growth for all schools. Removing growth would also have an unequal impact on schools and would contrary to state law, which requires growth measures in accountability.</p>
11	<p>Dr. Scott Rimes, Superintendent, Rankin County School District</p>	

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>This proposal has two parts: 1) using 2019 spring data as a baseline for growth and 2) using 2019 proficiency and growth for students who took Algebra I in the 8th grade in 2019-20 and have no scores to be banked for the 2022 model.</p> <p>Part 1) of the proposal will only impact 10th grade students who would have typically had 8th grade scores as a baseline for growth. While we understand the importance of growth on the accountability model, we question the validity, reliability, and statistical significance the data represent a three-year gap for growth measures rather than the two-year gap on which the model was developed, but also the baseline introduces pre-COVID data as the baseline to post-COVID data for only the 10th grade cohort. The results will skew high school component scores significantly, and likely lead to a revision of the high school cut points for the accountability model. At the same time, elementary and middle schools will be comparing post-COVID 2021 to 2022 data, which could be artificially inflated, further disrupting the validity of the 2022 accountability results.</p> <p>Part 2) of the proposal will impact a small but important part of the population: 10th grade students who took Algebra I in the 8th grade in 2020 and thus lack Algebra data for the 2022 accountability model.</p> <p>...we support the use of 7th grade proficiency and growth data for the 2020 8th Grade Algebra I student</p>	<p>Past analysis of the use of skip-year growth measures have not shown significant differences from prior-year measures. Also, this method is being used other states as a valid measure of student growth in the absence of prior-year assessment data.</p> <p>Although growth may reflect the impact of the pandemic, this does not make it invalid or unreliable.</p> <p>In support of the proposal.</p>
12	<p>Idalia Sterling, Math Teacher, Lincoln County School District</p> <p>I sincerely ask that you not count the Algebra I state test scores for our current tenth grade students in our 2021-2022 accountability model. I believe there are alternate</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>approaches that can be taken such as eliminating the algebra component for one year, counting the scores from this current school year, or even count the scores that were banked in 2018-2019 for which our school did not receive credit for those students' performance. I feel it is important to give all schools in the state a fair value in their accountability model and using last year's scores will not be a true reflection of the hard work that goes into Algebra I both by the teachers and the students of the state of Mississippi.</p>	<p>of banked, high school, end-of-course assessments from 2020-2021.</p>
13	<p>Kris Perkins, Principal, DeSoto County School District</p> <p>Having evaluated the current options that are slated to go before the board and the recommendations presented by the Accountability Task Force, I would like to offer an alternative for your consideration. Should the state decide to include test results and data for the current year accountability rating from students that tested during the pandemic as well as calculating growth comparing pre-pandemic to post-pandemic data, I respectfully request that the board consider the following option:</p> <ul style="list-style-type: none"> - Publish the letter grade for all schools and districts in the state of Mississippi for both 2018-2019 and 2021-2022 and assign the higher of the two as the school and district's official accountability rating for 2021-2022. 	<p>The MDE does not recommend the continuation of 2018-2019 letter grade assignments.</p>
14	<p>Matt Thompson, Director of Federal Programs and Accountability, Union County School District</p> <p>Students in our district take Algebra 1 in the ninth grade. Therefore, our current 10th graders have banked scores from the 2020-2021 Algebra 1 test, undoubtedly the most disrupted school year since the accountability model has been in place. This is similarly the case for Biology as well, though less pronounced due to Biology lacking any growth component.</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>So, with the 20-21 test takers, you see growth having an incredibly negative effect. This is completely logical because you are measuring growth from 2018-2019 7th grade math to 2020-2021 Algebra 1. Even in normal times you would see a drop in growth from 7th grade math to Algebra 1 because 7th grade math scores are regularly higher than 8th grade math.</p> <p>The benchmark data from the 21-22 test takers (our current 9th graders) shows growth increasing which is to be expected due to this being a measure from 20-21 8th grade math (in-pandemic) to 21-22 Algebra 1 (somewhat post-pandemic, the first semester of 21-22 was greatly disrupted by the pandemic as well.) No math pre-pandemic data is used in these calculations, and rightfully so since school's performance for this year should all be measured in respects to the effects of the pandemic.</p> <p>Ultimately, I believe this proposed change will consequently communicate a negative message about the performance of schools with a 12th grade that is just flat-out inaccurate.</p>	
15	<p>Rebecca Ladner, Assistant Principal, Long Beach School District</p> <p>Last year the State Board suspended grading policies in order to support schools due to disruptions from COVID. Now the state is proposing to use some of this same data in this year's accountability model. Using data from the students' last year of uninterrupted school (7th grade) to calculate growth from a year when education was continuously disrupted due to hybrid learning, quarantine, shut down due to the number of COVID cases, Hurricane Zeta, etc. (9th grade) is totally unequitable. The</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	use of this data will not show the actuality of what schools are doing to mitigate the learning loss that took place.	
16	<p>Michael Watkins, Principal, Okolona School District</p> <p>I come from one of the smaller schools in which we test all of our 9th graders in the 9th grade for Algebra I and Biology. If the task force team measured growth from when they were in the 7th grade, It would hurt us tremendously because it will still be off of their Covid year in which the community and students thought it wouldn't count. On the other hand, this year we are working very hard to get all the points we can as a school in every category of the model. My 9th graders this year are excited about testing because they are redeeming themselves from last year (8th grade), but their test will not count until they are in the tenth grade. Again my current 10th graders who test Algebra I last year tried their best but based on the unforeseen situation which was starting school after labor day, being virtual, and hybrid. The growth wasn't there to give my students a fair shot in getting more points. Please consider another option that will be fair for all high schools when it comes to the students and how the task force will measure points for schools that this will hurt.</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>
17	<p>Dr. Donna Boone, Superintendent, Forrest County Agricultural High School</p> <p>The first proposed recommendation is for students with end-of-course assessment included in the accountability calculations during the 2021-2022 school year for growth. These students would be those who took Algebra I as 9th graders in the 2020-2021 school year or will take Algebra I as a 10th graders this year. The proposed temporary change will base their growth on their 7th grade score in 2018-2019. When these students were in 7th grade, our world was pre-pandemic.</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>I understand that Mississippi was given an accountability waiver at both the state and federal level during the 2020-2021 school year, but last year and even this year, our students have continued to be impacted by the pandemic. I feel that a better transition back to our accountability system, especially in the area of growth for high school would be a “hold harmless” for this year only.</p> <p>For most K-12 districts, the score will be even each side out – 3-8 versus 9–12, but for Forrest County Agricultural High School, we don’t have any 3-8 scores to provide additional growth to our accountability score.</p>	<p>Effective with the 2013-2014 school year, Miss. Code Ann. §37-17-6(5)(a) requires the State Department of Education to implement a single “A” through “F” school and school district accountability system.</p> <p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>
18	<p>Sarah Sanzin, Assistant Principal, Long Beach School District</p> <p>As an assistant principal, it is my privilege and duty to advocate for my teachers and students. The 2019-2020 and 2020-2021 school years were like no others. During those unprecedented times, I can confidently say all Long Beach School District leadership/faculty/staff carefully planned, diligently taught, and graciously loved our students and families. In spite of our dedication, the instructional environment had been immensely impacted and learning was disrupted. Due to this impact, the banked test scores are not an accurate reflection of our teachers' abilities and students' mastery of the state standards. The scores are greatly flawed only due to the effects of the pandemic.</p> <p>Knowing this truth, I believe that is why the Department of Education made the decision to give grace last year. I implore you to discard the banked scores and utilize this year's scores as the new baseline. As a nation, our teachers and students are ready to move forward and celebrate their current successes.</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
19	Luke Tentoni, Assistant Principal, New Albany School District (Duplicate of public comment #4)	See response to public comment #4.
20	April Hobson, CTE Director, New Albany School District (Duplicate of public comment #4)	See response to public comment #4.
21	<p>Cody Killen, Newton County School District</p> <p>First off, I am in favor of accountability. Actually, I enjoy accountability; however, I feel the options that are available could benefit some schools more than others. Example: Some schools offer Algebra I in the 8th grade. The students that were in the 8th grade in 2019-2020 did not test. It is my understanding that students in this category are going to be able to count their 7th grade math scores for growth and proficiency. Based on cut scores, this grade level/subject (7th Math) is the easiest level in which to show growth and proficiency which creates an unfair advantage for schools who offer 8th graders Alg I.</p> <p>Also, holding schools and administrators accountable for scores (bank Alg I scores) from the 2020-2021 SY is not the greatest idea. Many students (sadly some teachers as well) did not take the test seriously as they were told the test would not count. Not everyone had this mentality but some did. This growth, for 9th graders from 2020-2021, will be calculated from their 7th grade math scores. Again, proving more difficult to show growth from 7th grade solely based on cut score. The curriculum is also vastly different.</p>	<p>Because the MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021, there is a recommendation to eliminate the previous proposal.</p> <p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p>
22	<p>Justin Sutton, Principal, Long Beach School District</p> <p>Given these varying circumstances, the argument that a fair for all accountability model can be created reflecting data from the 2020-2021 school year should be dismissed out of hand.</p>	The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>The use of banked scores means data from last school year, with the world still in the midst of a pandemic, will be measured against scores from a time without the impact of a pandemic. This is concerning as it will create an artificial deflation of growth calculations for 1000-point schools. Even if legacy scores are used in this growth calculation to avoid this, it will present a false picture of the impact of COVID-19 on schools. While 700-point schools will have two data points from the time period after the onset of the pandemic, they will show an unsustainable growth which may wrongly imply that the impact of COVID-19 on learning and education in general has been overcome.</p> <p>Lastly, the changing of business rules, for one year only, implies that a model that has been designed to be a constant in terms of accountability, will be anything but a constant.</p>	<p>Growth and proficiency calculations will reflect the impact of the pandemic, as expected.</p> <p>Although growth may reflect the impact of the pandemic, this does not make it invalid or unreliable.</p> <p>The USED is allowing states to make one-year adjustments to account for missing data or data that is incomplete due to the pandemic in order to continue accountability measures as soon as possibility.</p>
23	<p>John Ferrell, Assistant Superintendent, New Albany Public School District (See comments from #4)</p>	<p>See response to public comment #4.</p>
24	<p>Dr. Lance Evans, Superintendent, New Albany Public School District (See comments from #4)</p>	<p>See response to public comment #4.</p>
25	<p>Dr. Avenge Pittman Jr., Director of Alternative Education, New Albany Public School District (See comments from #4)</p>	<p>See response to public comment #4.</p>
26	<p>Christie Holley, Superintendent, Tishomingo County School District The current recommendation proposed using 2018-2019 assessment data to calculate growth for students who have a banked score from 2020-2021. These students do not have a prior-year school due to the suspension of</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	<p>assessments in 2019-2020. While I understand this poses a problem for calculations under our current accountability model and current business rules, the question I must ask is this: do we as educators work for the model or does the model work for us?</p> <p>It feels that this attempt to “validate” a score for a student in order to report a letter grade to our communities (that is statistically invalid, by the way) goes against the very nature of a teacher and education itself.</p> <p>Using 2018-2019 data with students who skipped a year of assessments and then took a test last year that was irrelevant (as it was accounted to the state those scores would not count against any student) is an injustice to the student and especially the student’s teachers. In particular, using a child’s 7th grade math score from 2018-2019 to measure their growth to Algebra I in 2021-2022 as 9th graders cannot be valid. The content differences alone in these two subjects make measuring growth in any kind of valid way impossible. Secondly, when the 9th grade student took the test in 2021-2022, he/she knew it would not count for his/her personal accountability, nor the school’s accountability, nor the district’s accountability. The test automatically becomes a statistical anomaly. The recommendation to try to statistically “connect” a 7th grade math score to a “non-counting” Algebra I math score is not responsible.</p> <p>The state should support our people and freeze the letter grades another year in order to provide a more accurate data baseline moving forward. Another suggestion would be to run the model with available data and schools/districts get the higher of the two letter grades (2018-2019 or current).</p>	<p>of banked, high school, end-of-course assessments from 2020-2021.</p> <p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p> <p>Past analysis of the use of skip-year growth measures have not shown significant differences from prior-year measures. Also, this method is being used other states as a valid measure of student growth in the absence of prior-year assessment data.</p> <p>The MDE does not recommend the continuation of 2018-2019 letter grade assignments.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
27	<p>Dr. David Daigneault, Superintendent, Grenada School District</p> <p>Several concerns include the following:</p> <ul style="list-style-type: none"> Utilizing banked scores from the 2020-2021 school year in Algebra I and Biology will be detrimental to accountability scores. Those assessments were waived for graduation and accountability during the 2020-2021 school year, so it will be difficult to explain to our teachers, parents, and students why those scores would be applied to the current model. Those assessment scores are also much lower than the past which is severely impacting our accountability for this year. Growth being measured using the pre-covid 2018-2019 school-year scores in Algebra I and English II is going to be detrimental to our accountability scores. Utilizing ACT scores to calculate the College and Career Readiness indicator will severely impact our high school and district. Again, the ACT scores that will be used in this area of the accountability model are from 2020-2021, a pandemic year. <p>Grenada School District utilizes CASE benchmark assessments throughout the year to monitor our progress towards the accountability model. We are seeing a severe drop in growth scores at the high school level when utilizing the bank scores for Algebra I and Biology along with the 7th grade scores for growth in English II and Algebra I.</p> <p>Grenada School District recommends making minimal changes to the business rules by allowing districts and schools to publish and use the higher score between the two accountability models from the 2018-2019 or the current year, 2021-2022.</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p> <p>Districts have the ability to enter ACT scores from other administrations for inclusion in accountability measures.</p> <p>The MDE does not recommend the continuation of 2018-2019 letter grade assignments.</p>
28	<p>Matt Buchanan, Principal, New Albany School District (See comments from #4)</p>	<p>See response to public comment #4.</p>

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
29	Paul Henry, Principal, New Albany School District (See comments from #4)	See response to public comment #4.
30	Grant Goolsby, Assistant Principal, New Albany School District (See comments from #4)	See response to public comment #4.
31	Lori Price, Assistant Superintendent, Long Beach School District <p>I am asking that this same grace be granted with the banked scores. Using any scores from the 2020-21 school year to calculate the rating for the 2021-22 school year would be, in my opinion, a skewed view of the data from this school year. MDE has already stated that the scores from the previous year were to obtain data to provide information on the impact of COVID-19. The Long Beach School District has worked diligently to use this information for that very purpose and to overcome the learning loss evident in this data. To use this information for any other reason would be misleading and create an additional hurdle for our teachers and students to overcome in an already challenging time.</p> <p>I plead that you consider using legacy data rather than skip year growth for the growth component. I feel that this will allow for accountability to be provided to our teachers and students with fairness and equitability. Thank you in advance for your consideration.</p>	<p>The MDE will propose using 2021-2022 high school, end-of-course assessments for accountability measures in 2021-2022 in lieu of banked, high school, end-of-course assessments from 2020-2021.</p> <p>The MDE recommends minimal use of pre-pandemic data that may mute the impact of the pandemic on accountability data.</p>
32	Wes McCullough, New Albany School District (Document was submitted in an unacceptable format. Due to MDE procedures, MDE staff are unable to open the document. MDE staff emailed the individual requesting that it be resubmitted as an attachment, but no response was received before the APA comment period closed.)	
33	Anna Kathryn Sloan, New Albany School District (Document was submitted in an unacceptable format. Due to MDE procedures, MDE staff are unable to open the	

The Office of Accountability received the following APA comment(s) regarding the proposed revisions to Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade, Section 11, Comprehensive Support and Improvement Schools (CSI), Section 12, Targeted Support and Improvement Schools (TSI), and Section 13, Additional Targeted Support and Improvement Schools (ATSI).

#	Summary of Comment	MDE Response
	document. MDE staff emailed the individual requesting that it be resubmitted as an attachment, but no response was received before the APA comment period closed.)	
34	Gwen Russell, New Albany School District (Document was submitted in an unacceptable format. Due to MDE procedures, MDE staff are unable to open the document. MDE staff emailed the individual requesting that it be resubmitted as an attachment, but no response was received before the APA comment period closed.)	

From: Cameron Gates <gatescameron8@gmail.com>

Date: March 28, 2022 at 1:50:04 PM EDT

To: Carey Wright <CWright@mdek12.org>

Subject: In response to the board seeking public input on your accountability system

African wisdom:. If a herd of cattle is starving, does weighing the cows everyday make a difference?

From: Cameron Lea Gates, former Mississippi public school teacher that witnessed multi-million dollar grant fraud and money laundering in the Clarksdale Municipal School District.

Google this: Memphis City Schools spends over 3 million on an online standardized test that never was delivered. The woman in charge goes on to work for the Memphis Chamber of Commerce. Teachers spent months preparing for a fake test.

Questions I have personally seen on Mississippi state assessments while proctoring for grades K-2. What is the difference between hard rocks and soft rocks? - meaning the stones, not the music. What vehicle will fit the most people, an airplane, a bus or a boat? - with cartoon pictures of each; my Kindergarten students from Tunica county that had never been on an airplane or a large ship, wisely counted the windows and choose the bus because it had the most visible windows, which was the WRONG answer. I no longer believe in public, private or parochial education. It's all designed to destroy young people's minds and punish the few decent humans left on Earth that would take on caring for up to 600 different children in one week. That's right; 6 classes a day, 5 days a week with up to 35 individuals per class and all their personalities, allergies and learning disorders, for a district that claims to have no money for supplies, a working copy machine, toilet paper, sanitizer, etc.

It's all an organized crime racket and you are their mole. Where does all the money go? It's obviously not staying in Coahoma county.

This isn't about a real standardized test or ranking system - this is really about creating a new money funnel to sap resources away from districts.

Seriously regretting not being a stripper and shacking up with a weed man, instead of giving up over 10 years of my life to an impossible system that destroys souls,

Cameron Lea Gates

P.S. Y'all's so called teacher raise is just another pile of monkey sh💩t.

19016015648

1682 Clementine Road

Memphis TN 38114

Superintendents of the North Mississippi RESA

March 24, 2022

To the State Board of Education and Dr. Wright,

Thank you for your support of public education throughout the years. Together we have made enormous strides in academic achievement that will give our state a brighter future. Those achievements have been accomplished through a collective effort and a shared mindset of urgency and tenacity. Those qualities are at the fabric of our concerns with the current accountability plans for the 2021-2022 school year.

First of all, our schools were informed that during the 2020-2021 school year they would be "held harmless". This connotation has long been regarded as tests scored during those respective years cannot negatively affect a school or district, thus the term "hold harmless". Superintendents are now discovering that the ninth-grade scores during the "hold harmless" school year will count towards this year's accountability ratings. We understand that the US Department of Education plays a major role in this decision, but that does not negate the responsibility of our state department to support our teachers and schools in attempting to secure a workable solution for everyone. We, as a united group of superintendents, ask that the impact data be made available to the state board, the legislature, and individual districts regarding the banking of scores.

Counting the scores from last year's ninth-graders is also discriminatory. Schools and districts were advised by the Mississippi Department of Health to go virtual during the peak of the pandemic. Virtual education more adversely affected those students in poverty than those in affluent school districts. The aforementioned impact data will bear that out. By counting banked scores, the school board and the state of Mississippi are unintentionally stating that a school or district's letter grade from the previous year will depend largely on the zip code of your district. Access to broadband in Mississippi is sporadic. Although mobile hotspots were made available to practically every student that wanted one, most rural areas in Mississippi did not have access to adequate cellular reception. This only reinforces the idea of a student's zip code determining the quality of his or her education.

Secondly, using legacy growth for those who tested as ninth-graders last year is another deterrent for our teachers. In using legacy growth, a student's ninth-grade hold-harmless score will be compared with their pre-pandemic seventh-grade scores. This practice is extremely problematic. Students' pre-pandemic scores cannot reliably be compared with a post-pandemic score. Too much instruction was lost during the pandemic. Again, this situation adversely affects those students in poverty more than the non-poverty students. We are asking that pre-pandemic/post-pandemic growth impact data be provided to all applicable parties as well.

Thirdly, the impact of lower letter grades, in no small part, to ninth grade banked "hold harmless" scores will have a plethora of negative consequences for our schools. The lower accountability scores will lead to lower student and teacher morale. This will, in turn, adversely affect every community and school in Mississippi. The decision to base a state-mandated "letter grade" on scores during a year where the assumption was that every score would not count will only exacerbate the teacher shortage. Last year, teachers were asked to use a dual-modality of teaching methods. One saving grace, at the core of its foundation, was that the pressure of assessments would be lessened while the teachers learned how to effectively educate amid the biggest pandemic of our lives.

Finally, assigning letter grades using scores from assessments taken during a pandemic-riddled school year does not reliably convey the quality of each school and district in Mississippi. The aforementioned impact data should bear that out. Almost all high schools will inevitably drop because of the inclusion of last year's scores in the calculations. This is another morale-killing decision during a time when schools are finally getting back to normal.

In closing, famous economist and educator Milton Friedman once said this: "One of the great mistakes is to judge policies and programs by their intentions rather than their results." While MDE's intentions may be to get our educational system "back to normal" by using our current accountability model and to give a sense of normalcy to our communities after the past two years, the results will be far from normal. Instead, communities will see data that does not truly represent teacher, student, and school performance, especially in our high schools with banked scores counting during a "hold harmless" year. As Friedman stated, the results of these policies will diminish all of MDE's intentions if this holds true as the accountability results will not be indicative of what our schools have done. We unitedly implore you to consider the impact of such policies and decisions as it will directly affect each community, each school, each teacher, and each student in our state.

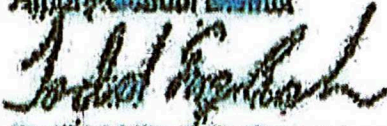
Respectfully,
Superintendents of the North Mississippi RESA Group



Mr. Jeff Clay, Superintendent
Aberdeen School District



Mr. Bryan J. Juma, Superintendent
Apopka School District



Dr. Todd English, Superintendent
Booneville School District



Mr. Tim Wygal, Superintendent
Haworth County School District



Mr. Ray Lawson, Superintendent
Marshall County School District



Mr. Tim Dickerson, Superintendent
Nashville School District



Mr. Scott Smith, Superintendent
North Tappah School District



Dr. Michelle Bivens, Superintendent
Pontotoc City School District



Mr. Brandon Cahn, Superintendent
Alcorn County School District



Mr. Mark G. Brown, Superintendent
Baldwin School District



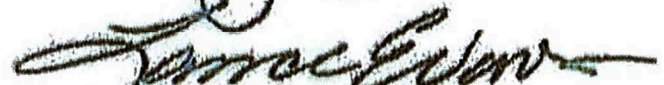
Mr. John Ellison, Superintendent
Clackson County School District



Mr. Cole Magee, Superintendent
Lee County School District



Mr. Brian Jenkins, Superintendent
Monroe County School District






Dr. Lance Evans, Superintendent
New Albany School District





Mr. Chad Spence, Superintendent
Okolona Municipal School District



Dr. Brock Puckett, Superintendent
Pontotoc County School District



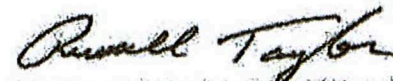

Mr. Jeff Palmer, Superintendent
Prentiss County School District


Dr. Eddie Peasant, Superintendent
Starkville Oktibbeha School District


Dr. Rob Picou, Superintendent
Tupelo Public School District


Mr. Tony Elliott, Superintendent
South Tippah School District


Mrs. Christie Holly, Superintendent
Tishomingo County School District


Mr. Russell Taylor, Superintendent
Union County School District

April 1, 2022

Ms. Angela Kitchens

Office of Student Assessment
Mississippi Department of Education
accreditation@mdek12.org

Re: Public Comment on A-F District Ratings

Dear Ms. Kitchens,

I have been an economic developer in the State of Mississippi for the past 22 years and the Community Development Foundation is consistently recognized as one of the top local economic development groups in the country. We regularly compete with states and communities across this country, and I have met with numerous site selection consultants and company executives. K-12 education is always a major determining factor in the company's site location decision. Based on this professional experience, I believe the current A-F bumper sticker labeling within the accountability system is having devastating consequences on our Mississippi community's ability to grow.

Generally, Mississippi's public education system has a negative perception from corporate executives that we must overcome. For this reason, the labeling of a "A" or "B" school district does not mean anything to corporate executives or top tier talent that is considering a Mississippi community because it does not translate to national comparisons. However, a labeling of a "C-F" school district creates an immediate stigma before national comparisons can even be considered.

The current system creates a gamification and labeling our school districts and the communities they serve. Gamification meaning that "A" districts are limited to the top 20% or so of the total school districts regardless of actual test scores and the bottom 10-15% of total school districts will always be labeled as a "F" district regardless of actual test scores. The current labeling system is a moving target with nontransparent variables to manipulate the segregation of "A-F" districts that MDE wants to label. The statewide test results, if mapped in combination with demographics and/or free and reduced lunch assistance, creates a parallel labeling of privileged versus diverse and/or under served communities.

I am also a parent of 4 kids who attends and/or graduated from Tupelo Public School District. As a parent I have experienced that this labeling system has restructured our schools and teachers' sole purpose and importance to teaching a test versus learning. The trickle-down effect of this system is that our kids are also labeled as a good or bad student based on one test/one day out of a year versus how they performed in the classroom all year.

(Continued)

April 1, 2022

Ms. Angela Kitchens

Office of Student Assessment
Mississippi Department of Education
accreditation@mdek12.org

Re: Public Comment on A-F District Ratings

(Continued)

The unintended consequences of this MDE district bumper sticker labeling are that it hurts our Mississippi communities' efforts to recruit new businesses and talent attraction while also encouraging the privileged to choose alternate school choices both of which create a doom loop for our Mississippi communities' growth. I strongly encourage MDE to reconsider their current accountability system, but at the very least to eliminate the bumper sticker labeling it is giving their districts and indirectly the communities they serve.

If you have any questions, please contact me at 662.842.4521.

Sincerely,



Shane Homan
Chief Operating Officer
662.842.4521
shoman@cdfms.org

Hello,

I am writing to discuss the state board accountability business rules change proposal that occurred on March 17, 2022.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let’s first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce drastically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that it has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where students lost skills the most. And with this proposal, it does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data across the subjects and different grade levels. This has nothing to do with the current performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.
- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their

graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.

- In our state anytime a student's high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.
- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly **in 2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools' accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the "banked year" because of systematic rules?
- How do we as a district explain to administrators and teachers that the "targets" moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a "decision?"
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the "high school bridge" year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school's accountability would have been with this component that year. Originally, this component could not help a district or school, it could only punish them. The best each school could hope for was to not "lose points." This component by rule was incentivizing schools to not want to have EL students for accountability's sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as "off-topic" for the current items out for APA, I included this to show that we have tried "lack of common sense" rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 “in-pandemic” scores compared to “pre-pandemic” higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are “competing” with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to “play the game.” There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.
- Part of this proposal is that schools/districts with middle school Algebra I will have students that were enrolled in 2019-2020 in Algebra I have their 2018-2019 8th grade math proficiency and growth **pre-pandemic** scores counted in the numerator while schools without middle school Algebra I will NOT have their 9th grade 2018-2019 and 2019-2020 9th grade scores counted in the numerator. This will be a MAJOR advantage for schools/districts with middle school Algebra I against those without middle school Algebra I. Again, certain schools will have an advantage not because of student performance but because of “a decision made.” This becomes extremely inequitable since the 1000 scale letter grade cuts are almost certainly going to get reset if 2020-2021 banked scores are factored in. Schools are then competing with each other for letter grades.

Better options presented in the Accountability Task Force meetings:

- Use banked 2018-2019 and fall 2019-2020 scores in place of 2020-2021 banked scores was the first option presented in an Accountability Task Force meeting by a member. This compares pre-pandemic data to pre-pandemic data regarding the growth part of this equation. This seems to be acceptable based on the USDE guidance according to B-3... *may choose to amend its plan for the 2021-2022 school year to use one year of data (i.e., 2021-2022) or average data from the current year and earlier school years (e.g., 2018-2019 and 2021-2022).* In this plan, 2021-2022 10th grade first time testers would be combined with banked 2018-2019 and fall banked 2019-2020 scores so there is a combination of scores as the USDE guidance states. To do this, all we must do is change

rule 10.1 to allow for students in grade 11 and 12 to be counted this year in the one-year amendment process for students that met FAY in the district for the test year, 2020-2021 and 2021-2022. **They have never counted in accountability and are in 11th or 12th grade this year.** Proficiency and growth are already calculated for them. **It makes sense as they are still our students.** Dr. Chris Domaleski said in the Accountability Task Force Meeting that the USDE would approve this. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year. The MDE doesn't want to use pre-pandemic results which is their reasoning for not doing this. The state is already using pre-pandemic baselines with their current recommendation to compare against "in pandemic" scores already. Also, the other part of what is out for APA is that we are using pre-pandemic middle school scores in the numerator. So why wouldn't we use pre-pandemic 9th grade scores if we are already using pre-pandemic middle school scores? See previous section for how inequitable this decision is and the impact.

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.
- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter

grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the “pool” for ATSI and TSI (especially with lower 2020-2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when identifying school improvement. The USDE guidance clearly allows this as B-7 says *“For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators.”* How would we calculate total points? Either equate them to the 1000 scale from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn’t change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

- This option was not discussed specifically at an Accountability Task Force Meeting but since the previous precedent in this state is if a score did not count to the student’s graduation requirement, then it does not count to the school or district without another option, a new option should emerge. All districts and all schools should have their 2018-2019 letter grade and their 2021-2022 letter grade published and the higher of the two letter grades should become the official letter grade due to everything that has been said in this statement. The USDE does not mandate letter grades. We would report to them the 2021-2022 data. This satisfies all federal and state requirements but at the same time explains to the public that this data is not going to be on a level playing field compared to the past or across the state for at least two years. Combining this with option 1 or 2 makes sense as well.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.

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

To Whom It May Concern:

Please accept this letter for the discussion of the business rule proposal that occurred on March 17th.

We were faced with an unprecedented pandemic over the last two years. Our students in Mississippi have suffered tremendous learning loss. Teachers and students across our state have worked extremely hard to address the effects of interrupted school years. To begin to address the learning loss issue, we must first determine where our students are academically. The method of determining where our students are, academically, should accentuate the positive gains we have made as a state, while providing an honest assessment of the work required to ensure students are ready for college and careers after graduation.

There are several problems, however, with the current recommendations. First, using skewed data from the current year is incomparable to previous years and the other scales for the current year. The students we have this year, are not the same mentally and emotionally as they were pre-pandemic. Comparing the two will produce data which is not valid, nor reliable. There's also the issue of the 7th grade math scores being consistently higher in Mississippi than the 8th grade math scores. Growth will suffer at the high school levels through no fault of the high schools.

Secondly, it is not beyond the realm of possibility that the 1,000-point scales for schools and districts will have to temporarily be reset. By comparing pre-pandemic scores to post-pandemic scores AND including banked scores from last year, during a "hold harmless" year where the students did not have to pass the subject area tests to graduate, score at the high school and district levels could plummet up to 300 points. Scales of the 700-point schools would likely need to be temporarily reset as well. Since growth is worth 400 of the 700 total points, the scores at those schools are likely to be artificially inflated for the upcoming year and significantly deflated the following year.

Finally, counting accountability scores that are artificially low or artificially high can have a negative effect on teacher morale. Scores will significantly fluctuate the next two years. Teachers in high schools will be deflated next year with the suppressed scores and likewise the following year for those teachers in the 700-point schools. Teachers were the true heroes during the pandemic. Districts will have a difficult time recruiting and retaining teachers if the current recommendations are made official.

In closing, the Mississippi Department of Education has an unenviable task of measuring students' growth and progress after the pandemic. There are no easy answers to this dilemma. I appreciate the efforts of everyone involved in helping make Mississippi competitive academically. I look forward to working with each of you to help make our state's education system one of the best in the nation.

Respectfully,

Todd English, Ed. D.
Superintendent, Booneville School District
Together We're Better

Jo Ann Malone

From: Tyler Hansford <hansfordt@unionyellowjackets.org>
Sent: Wednesday, April 6, 2022 9:37 AM
To: Accreditation Shared
Cc: rushd; robinsonz; SchoolBoard; smithw
Subject: APA Public Comment on Revision of Business Rule for MSAS

Please accept the following comment related to:

Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System

Comparing banked 10th scores to a student's score from 7th grade is not reliable data. The 7th grade tests are historically more simple than the 8th grade tests and certainly the high school tests. In our district, proficiency at the high school was near an all time high in spite of the pandemic, but the growth calculation will not reflect that because of the comparison to 7th grade scores. We stand to lose between 100 and 150 points in growth at the high school if scores are calculated like MDE is proposing. That is not an accurate reflection of what is going on. I know MANY other schools face the same fate. This is NOT what is best for kids and this is NOT what is best for communities. There are already enough issues going on with this accountability model that need to be fixed. Playing a game like this with an already flawed model is just bad business.

--
Tyler C. Hansford, Ed.D
Superintendent
Union Public School District
417 S. Decatur St.
Union, MS 39365
hansfordt@unionyellowjackets.org

Follow me on Twitter at [@tyler_hansford](https://twitter.com/tyler_hansford)

March 29, 2022

Angela Kitchens
Office of Accreditation
359 North West Street
PO Box 771
Jackson, MS 39205-0771

To Whom It May Concern:

This letter is being written in response to the state board's invitation for public comments on temporary accountability adjustments.

I am in total agreement that students in the state of Mississippi should participate in statewide testing. However, due to the disruption in schooling and state assessments for two consecutive years, I feel that an adjustment must be made to the accountability system for this current school year and for 2022- 2023.

I understand that the U.S. Department of Education (USED) is currently requiring states to resume their accountability systems and report, however, they are not requiring states to issue letter grades. In fact, the USED is allowing the states to make adjustments. As a state, we need to take advantage of this opportunity. Please request a one year addendum that is in the best interest of all students in the state.

Again, students should test, but please do not assign letter grades this year. Our students missed a great deal of school in 20-21 and this year should be used as a baseline year. Gather the data and report it to the USED, but do not issue letter grades.

Finally, regarding high schools, it is not fair to pull scores from 18-19 in order to calculate growth. Since growth cannot be calculated for the high schools, now is your chance to make adjustments to the model that will benefit all schools in the state.

In my opinion, an adjustment must be made to the accountability system for this school year and next school year. It is the right thing to do.

Jo Ann Malone

From: Kelleigh Broussard <kelleigh.Broussard@lbsdk12.com>
Sent: Thursday, April 7, 2022 12:53 PM
To: Accreditation Shared
Subject: APA Comments for Business Rules

Ms. Kitchens,

In regards to the business rules pertaining to banking scores for EOC for courses taken before 10th grade, it would be unfair to use 2021 banked scores based on the following:

1. 2021 was a year wherein educators across the state faced a pandemic resulting in extended periods of disrupted learning. In January of 2021, MDE sent out correspondence stating that it would be a year of grace. To turn around and now use that data to report proficiency and growth in 2022 would not be fair to students, teachers, principals, nor districts.
2. To calculate growth using a proposed skip year concept is not stated in business rules. What is stated is that EOC cannot be excluded from growth calculations. The only reference to a 7th grade score is for those students who take Alg in 8th grade. So, if a business rule is going to now be written to address the gap for 2021 9th graders who took Alg. I based on their 2019 (7th grade) performance, why not write the rule to utilize legacy growth data? Legacy data would be much better than plugging in disconnected measures that will not measure genuine growth through vertical progression. It would be misleading to attempt this. While it would present a magnified impact of Covid, it would stem from a distortion of data that the public will not understand.

Ideally, no 9th grade banked scores from 2021 should be utilized. This is the preference without hesitation. Rather, utilize 2022 9th grade scores to move forward in calculating growth measures, but if 9th grade scores from 2021 must be used, then combine it with legacy scores from 2019 for growth.

The state can push out detailed reports to publish the impact of Covid, but when it comes to assigning letter grades, that's ALL that matters to the public. It would be unfathomable to now penalize districts for doing their best last year during a pandemic.

I implore you to please make a decision that supports public education and its teachers in lieu of setting up educators to walk through a public gauntlet. No matter how loud of a message that is sent out to explain that we are recalibrating, the public and school boards WILL NOT REMEMBER this nor frankly care come October when grades get posted. They will have long forgotten about Covid and would not understand how LAST year's scores show up this year and are combined with growth from 3 years ago.

I thank you for your time and consideration of the matter.

Respectfully,
Kelleigh Reynolds Broussard, Ed.S.
Assistant Superintendent

Long Beach School District

19148 Commission Road
Long Beach, MS 39560
228-864-1146

Long Beach School District... A System of Excellence!

"The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution or use of the contents of this message is strictly prohibited. If you received this electronic message in error, please notify us immediately at (228-864-1146)."

APA Comment
Accountability Proposal

- Neshoba Central High School will lose 152 points if this method of growth is used.
 - This is real data from state tests as 9th grade students last year as well as this past Fall with 10 grade students. We are on 4X4 schedule. This is not from benchmark testing.
 - This year, we will have some of the best proficiency we have had along with CCR, Grad rate, history, acceleration etc. yet this method will cause us to go from a B to a D by no fault of our own.
- The 7th grade math test is an easier test. The 7th grade math test is NOT an Algebra test. The growth is invalid. This will compare in-pandemic data vs much higher pre-pandemic data and had never been compared to skip year growth previously as at such a wide scale. This proposal does not give a year for some students to regain academic losses such as the grade 3-8 will be.
- If this is to show pandemic loss for high schools, then why are we not doing the same method for 3-8? If we are trying to show effects of the pandemic, this is extremely inaccurate.
- The “legacy scores” are a gift to some schools basically assuming they would have been proficient in that these students are usually selected based off proficiency to enter classes before 9th grade. If this is the case then to make it fair please include our Fall 2019 Algebra I scores.
- Bottom line- when most high schools are going to take an average of roughly 150-point loss, then the measurement is invalid. This is through no fault of our staff. It is through the fault of the model. This is impossible to explain a two-letter grade loss.

Suggestions:

- Ask the USDOE for a one-year amendment. I know this was presented in the Accountability Task Force meeting. B-2 on USDOE guidance.
- Use only proficiency for schools that choose to do so. Use an equating method to adjust cut scores for ratings. Allow schools that want growth to use their growth
- Use a bridge method- bridge the growth scores from 7th to high school. We made a bridge before, let's do it again.
- Score equating- take your average 6th and 7th grade years and compare to past high school years and give the average.

Ramifications:

- Impossible to explain why a high school could lose two letter grades with this method.
- Teacher morale- How do we explain this to staff? They performed admirably during this time, but we are going with a temporary method that destroys high schools.
- School that worked hard last year will get penalized vs schools that basically did not have school. It is much easier to grow from one year to the next when a school did absolutely nothing.

- Current principals that would be great superintendents will be penalized, by no fault of their own, because of the law that requires A,B,C to for three years to be a superintendent.
- I know of no high school that will not drop at least one letter.
- How does this assist our students, teachers, administrators and communities going forward?



**MADISON COUNTY
SCHOOLS**

MARK OF EXCELLENCE

SUPERINTENDENT OF EDUCATION
Charlotte A. Seals

BOARD OF EDUCATION
Dr. Pollia Grffin, President
Sam Kelly, Secretary
Dr. Jason Dean
William Grissett
Philip Huskey

TO: Dr. Paula Vanderford
Chief Accountability Officer
Mississippi Department of Education, Office of District and School Performance

FROM: Mrs. Charlotte Seals
Superintendent

Dr. Greg Paczak
Director of Research & Development

Dr. Elizabeth Wells
Research & Development Analyst

DATE: April 8, 2022

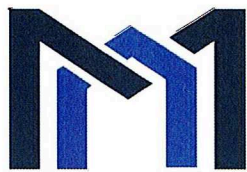
SUBJECT: Administrative Procedures Act (APA) Process Response for the Proposed
Mississippi Statewide Accountability System Revisions

The Mississippi Department of Education (MDE) encourages public confidence in school districts across the state by sharing student performance on state and national assessments. Reporting student proficiency and growth on the Mississippi Academic Assessment Program (MAAP) assessments provides transparency to stakeholders. Furthermore, the assignment and communicating of letter grades for schools and districts is intended to make evident to local communities that teachers, principals, and administrators can be trusted to support their children with a high-quality educational experience. However, given that student growth is one of the two primary factors used to determine the letter grades for both schools and districts, the proposed recommendation for our high schools to use pre-pandemic 7th grade scores as the baseline to measure growth could compromise this trust.

Current Concerns

In collaboration with other Mississippi school districts statewide, the current projections based on district-utilized benchmarks at the high school level show measuring growth between 7th grade scores from the 2018-2019 MAAP assessment and current year End-of-Course (EOC) assessments in Algebra I and English II yield high school ratings that decrease at least one to two letter grades. **Using 2018-2019 pre-pandemic 7th grade scores as the baseline for growth at the high-school level yields this potential drop in rating due to the following:**

- Longitudinal Statewide MAAP assessment results show that students perform better on 7th grade MAAP assessments than 8th grade MAAP assessments.



- Higher performance at the 7th grade level results in diminished opportunities for students to show growth to the Algebra I and English II EOC assessments.

Table 1 contains the percentage of 7th and 8th grade students in the state that performed at the highest level in English Language Arts (ELA) and Math during two years of testing (2018 and 2019). When comparisons are made between 7th grade and 8th grade, 7th grade has a greater percentage of students performing at the highest level than 8th grade for both years.

Table 1. Percentage of MS Students Scoring at the Highest Level in 2018 and 2019				
	ELA		Math	
	<i>7th Grade</i>	<i>8th Grade</i>	<i>7th Grade</i>	<i>8th Grade</i>
2018	12.8	6.6	15.2	11.7
2019	14.5	3.9	16.3	13.8

At the high school level, students are faced with assessments that have an increased level of complexity based on the nature of the content. Meeting growth from the 8th grade to the Algebra I and English II EOC assessments presents a unique challenge in a typical pre-pandemic to pre-pandemic accountability cycle. However, if pre-pandemic 7th grade scores are used as the baseline for growth in comparison with in-pandemic scores, this creates a much greater challenge and undue burden on high schools. Using pre-pandemic 7th grade scores as the baseline for growth will not reflect the tireless efforts of teachers to account for learning loss that resulted from students going virtual in Spring 2020 with some returning to school in late August/early September during the Fall of 2020 and others continuing virtual learning until Fall 2021.

Possible Alternative

Based on United States Department of Education guidance (B-3 and B-7), use the cohort grouping as outlined in the business rules. **Remove the four growth components when calculating accountability** at the high school level. This would result in high schools being on a 600-point scale.

The business rules indicate that the MDE has an established process for equating schools from a 600-point scale to a 700-point scale. Therefore, the MDE could use a similar process that follows the current business rules to equate a 600-point scale to a 1000-point scale at the high school level.



Rankin County School District

TRADITION OF EXCELLENCE

BRANDON FLORENCE McLAURIN NORTHWEST PELAHATCHIE RIDGEMOUNT PICKETT RICHLAND

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

April 5, 2022

Angela Kitchens
Office of Accreditation
Mississippi Department of Education
359 North West Street; PO Box 771
Jackson, Mississippi 39205-0771

Re: Proposed Revisions to Miss. Admin Code 7-24, specifically to business rules of the Mississippi Statewide Accountability System

Thank you for the opportunity to respond to the proposed changes to the business rules of the statewide accountability system. The changes proposed include the following change related to banking scores for end-of-course, subject area assessments taken before the 10th grade year. Considering missing data from the Spring 2020 assessments, MDE is proposing the following addendum:

If growth cannot be calculated because of a missing prior-year score from the spring of 2020, the prior-year score will be pulled from the 2018-19 school year to calculate growth. For students who took Algebra I in the 8th grade during the 2019-20 school year and did not test in the spring of 2020, the students' proficiency and growth score in math from the 2018-19 school year will be used in the math component calculations.

This proposal has two parts: 1) using 2019 spring data as a baseline for growth and 2) using 2019 proficiency and growth for students who took Algebra I in the 8th grade in 2019-20 and have no scores to be banked for the 2022 model.

Part 1) of the proposal will only impact 10th grade students who would have typically had 8th grade scores as a baseline for growth. ***While we understand the importance of growth on the accountability model, we question the validity, reliability, and statistical significance of using 7th grade data as a baseline for 10th grade tests.*** Not only will the data represent a three-year gap for growth measures rather than the two-year gap on which the model was developed, but also the baseline introduces pre-COVID data as the baseline to post-COVID data for *only* the 10th grade cohort. The results will skew high school component scores significantly, and likely lead to a revision of the high school cut points for the accountability model. At the same time, elementary and middle schools will be comparing post-COVID 2021 to 2022 data, which could be artificially inflated, further disrupting the validity of the 2022 accountability results.

Dr. Scott Rimes
Superintendent of Education



Rankin County School District

TRADITION OF EXCELLENCE

BRANDON FLORENCE MCLAURIN NORTHWEST PELAHATCHE PISGAH PUCKETT RICHLAND

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

Part 2) of the proposal will impact a small but important part of the population: 10th grade students who took Algebra I in the 8th grade in 2020 and thus lack Algebra data for the 2022 accountability model. For the 2021-22 school year, our district has 1470 students enrolled in grade 10; in the spring of 2020, 210 (14%) of these students took Algebra I in the district. While a district's math scores for accountability encompass much more than Algebra I, high schools serving grades 9-12 have only Algebra I for the math component, and this proposed rule is crucial to the consistency of the annual model for 9-12 schools. In fact, while the 8th grade Algebra group is 14% of our district's 10th grade, that percentage is much higher in 9-12 schools in which the 8th grade Algebra I students range from 16%-27% of the math component population. ***In an effort to promote consistency in the model, we support the use of 7th grade proficiency and growth data for the 2020 8th Grade Algebra I students.***

The data presented in the chart below address both parts of the proposal, as the data include 2019 math scores for a baseline, except for the Spring 2020 Algebra students who have the proficiency and math from 2020 included.

Date of Assessment	Count (% of cohort)	Proficiency	Growth
Spring 2020	210 (14.2%)	99.5%	113.6
Fall 2020	36 (2.4%)	45.5%	45.5
Spring 2021	951 (64.7%)		
Fall 2021	2 (<1%)		
Spring 2022 and beyond	138 (9.4%)	TBD	TBD
Not Applicable (Took Algebra Outside RCSD)	133 (9%)	Not Applicable	Not Applicable
RCSD ALGEBRA Prediction (with proposed rule)		54.1%	56.8
RCSD Math Prediction (all grades based on Spring 2022 benchmark)		54.2%	65.6
RCSD Math Components from 2019 (last state-provided score)		62.7%	75.0

We appreciate the opportunity to respond to proposed revisions to the standards. If you have any questions, please feel free to contact us for more information.

Yours in education,

Scott Rimes, Ph.D.
Superintendent of Education
Rankin County School District

Dr. Scott Rimes
Superintendent of Education

Jo Ann Malone

From: Idalia Sterling <isterling@lincoln.k12.ms.us>
Sent: Sunday, April 10, 2022 12:46 PM
To: Accreditation Shared
Subject: Internal Message Accountability Model 2021-2022

Idalia Sterling
West Lincoln Attendance Center
Brookhaven, MS
idalia.sterling@lincoln.k12.ms.us
(601) 833-4600

April 8, 2022

RE: Calculation of Accountability based on Algebra I test scores

To Whom It May Concern:

First, I would like to introduce myself. I am the current Algebra I teacher at West Lincoln Attendance Center in Brookhaven, MS. West Lincoln is a K-12 school located in a rural tight knit community. We currently hold a 'B' in the school accountability ratings.

My principal, Mr. John Shows, recently brought it to my attention that last year's Algebra I scores may count for this year's accountability. I understand that we all need accountability, but I do not believe this is the most fair assessment of our school's performance nor my hard work as their teacher.

Last year, we spent 17.2% of our days where all of our 7th-12th grade students were in a virtual learning environment. Additionally, 50 % of our students were in an at home virtual instruction time via Google Classroom or Zoom Meeting for 10.5% of our academic year. Also, 2.7 % of our year was spent at home with no instruction due to snow and ice in our area. When COVID-19 closed our school down for the safety of our students, they lost approximately 20% of instruction prior to the state testing time.

Consequently, last year, our students lost at least 30.4% of their instruction time. While our students were in a virtual learning day or in an at home virtual, I still have students that were left with no instruction on those days because they did not have access to a device or had limited internet access that is often seen in rural Southwest Mississippi.

If a student did have access to a device and strong enough internet access AND was not quarantined at some point during the year, they only had instruction from me in Algebra I for 83% of the school year. Last school year, I had the pleasure of teaching 66 Algebra I students. Of those sixty-six students, 41 of those students were quarantined for at least a 10-day span and some of them multiple times during that school year. If they could, they were a part of the classroom in a virtual setting. Some were too sick to be online and some did not have appropriate resources.

Aside from the given data that shows the lack of instruction that some of my students received, it was widely published that the state tests would not count for these students. Keeping high school students motivated and on track when they are faced with these high-stakes tests is already a huge chore, but when they have knowledge that their performance

does not count, students tend to slack off in their work efforts. This knowledge did not slow my efforts in continuing to cover the required Algebra I material, but it most certainly made my job harder.

This outlined distractions last year created a huge impact on the test scores for my students so much so that the counting of our Algebra I scores from the 2020-2021 school year will cause the accountability rating for our school to drop sharply to a 'C' or even lower.

I sincerely ask that you not count the Algebra I state test scores for our current tenth grade students in our 2021-2022 accountability model. I believe there are alternate approaches that can be taken such as eliminating the algebra component for one year, counting the scores from this current school year, or even count the scores that were banked in 2018-2019 for which our school did not receive credit for those students' performance. I feel it is important to give all schools in the state a fair value in their accountability model and using last year's scores will not be a true reflection of the hard work that goes into Algebra I both by the teachers and the students of the state of Mississippi

Sincerely,

Idalia Sterling
West Lincoln Attendance Center
Mathematics Instructor

The 2020-2021 school year presented many challenges to the educational community. While a large portion of the private sector workforce remained in a work-from-home status, educators were expected to return to work despite personal concerns for their safety to ensure that the most vulnerable stakeholder of our society, our K-12 students, were able to receive access to public education. Our teachers stepped up to the challenge.

Amongst the many challenges that teachers faced, one of the largest was the loss of face-to-face instructional time. Per the state of emergency declared by Governor Reeves, the MDE allowed several emergency policy changes to ensure that teachers had adequate time to plan and prepare for altered instruction while implementing new technology for virtual students as well as to allow additional time in the daily schedule for safety and social distancing in the classroom, lengthened class transitions, longer lunches, and extended arrival and dismissal windows. The specific losses for DeSoto County Schools and Lewisburg High School are detailed below:

- **13 Days** - Due to a reduction in instructional minutes to allow for class transitions, extended lunch times, and extended arrival and dismissal procedures for COVID safety, teachers lost 36 instructional minutes per day totaling 13 instructional days lost.
- **11 Days** - In an effort to provide additional planning time for teachers that were balancing teaching face-to-face students and in-person students simultaneously, DeSoto County Schools implemented 70% Friday's which resulted in a loss of 3,780 instructional minutes or 11 days in the classroom with students.
- **7 Days** - The school calendar was reduced from 180 days to 173 days. Professional development days were added to the beginning of the school year to allow teachers to plan, develop digital lessons, and create safety procedures for when students returned.
- **6 Days** - Northwest Mississippi experienced a historical snowstorm that closed schools for 6 days. While this was not COVID related, this only served to exacerbate an already untenable situation.

The total of in-person instructional days lost was 37 days or 20% of the school year. In addition to the days listed above, 46% of Lewisburg students, 597 out of 1,298 students, were quarantined for an average of 9 instructional days in 2020-2021 causing a significant disruption to their academic progress.

Imagine a restaurant, retail store, or goods producing business that closed its doors and effectively stopped transactions or production for 20% of a fiscal year and the impact that would have on their sales, profits, and output. What would be the response of the owners, investors, and shareholders? How would it be fair or equitable for owners and shareholders to hold their employees accountable for loss of profits and output when their time to produce was reduced by 20%? The same logic applies to our teachers and students. How can we effectively and with fidelity analyze data from the past year given the circumstances, count it as part of our current year accountability, and then assign a letter grade to our teachers and students that includes and compares pre-pandemic and in-pandemic data? How can we do anything but thank our teachers for risking their safety and showing up to school each day during a global pandemic while other professionals across the country worked from the comfort and safety of their home?

Aside from lost instructional minutes, there is also the issue of in-person versus virtual learning. While Lewisburg High School maintained 78% in-person learning during the 2020-2021 school year, other schools in DeSoto County had as much as 50% of their student population learning virtually. Ask any

teacher, parent, or student; there is no question as to the effectiveness of in-person learning versus remote learning. Teachers faced an impossible task of teaching both in-person and virtual students synchronously. While our teachers went above and beyond the call of duty, giving their personal time on their evenings and weekends to provide an education to our students, not being able to interact with the students in-person was a major barrier to student learning that certainly had an impact on academic progress.

Finally, our teachers were not immune to the impacts of COVID and quarantine. Teachers and their family members contracted COVID throughout the school year forcing them to take critical absences leaving students in the classroom with non-certified substitute teachers, when they were actually available. The impact of each day of instruction lost to a teacher's absence is immeasurable. While an adult may have been in the room with the students in the teacher's absence, there is no adequate replacement for a child's highly qualified teacher with whom they have developed a relationship and understanding of each child's specific needs.

Having evaluated the current options that are slated to go before the board and the recommendations presented by the Accountability Task Force, I would like to offer an alternative for your consideration. Should the state decide to include test results and data for the current year accountability rating from students that tested during the pandemic as well as calculating growth comparing pre-pandemic to post-pandemic data, I respectfully request that the board consider the following option:

- **Publish the letter grade for all schools and districts in the state of Mississippi for both 2018-2019 and 2021-2022 and assign the higher of the two as the school and district's official accountability rating for 2021-2022.**

This option would not require alteration of the accountability cut scores nor would it absolve schools and districts of publishing their data. This would merely enact an option that has precedent dating back to the transition from PARCC to MAAP where school's accountability was frozen during the implementation phase of MAAP due to the circumstances.

As a leader of some of the most outstanding and dedicated educators in the State of Mississippi, I am concerned for the mental and emotional impact that this decision will have on them. I live and work with these people each day and bear the responsibility of looking them in the eyes and trying to explain to them how these decisions make sense and are what is best for students. I fear that if a compromise is not reached, the repercussions on teacher recruitment and retention will be lasting and irreversible.

I appreciate your time and consideration and hope that I have, for the sake of my teachers and students, effectively communicated the circumstances, weight, and impact of the decision you are about to make.

Kris Perkins

Principal

Lewisburg High School

Hello,

I am writing to discuss the state board accountability business rules change proposal that occurred on March 17, 2022.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

I have given this recommendation a tremendous amount of thought. When changes are proposed, I like to look at they will affect everyone, not just the schools in my district. After analyzing this proposed change thoroughly, I truly believe this will greatly impact an overwhelming amount of schools with a 12th grade in a very negative way. I have a colleague from Desoto County, Mr. Ryan Kuykendall, that has written a very clear, logical, well-detailed explanation of the effects of this proposed rule change. To avoid being redundant I would just like to say I echo his comments.

I would like to provide some insight as to how this proposed change will affect the four K-12 attendance centers in our district. K-12 attendance centers are unique and unconventional in their configurations compared to most schools. Therefore, calculating their accountability score is more tedious than traditional elementary, middle and high schools.

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

Students in our district take Algebra 1 in the ninth grade. Therefore, our current 10th graders have banked scores from the 2020-2021 Algebra 1 test, undoubtedly the most disrupted school year since the accountability model has been in place. This is similarly the case for Biology as well, though less pronounced due to Biology lacking any growth component.

After each benchmark, we use all of our data to project how our schools and district are performing according to the accountability model. Allow me to show you the impact these Algebra 1 scores will have on our schools. The following data shows you the impact of the actual 2020-2021 Algebra 1 test compared to the 2021-2022 projections of our students currently in Algebra 1.

School A 18-19 (774 A)	Using High School Algebra 1 Data from 20-21 Test Takers	Using High School Algebra 1 Benchmark Data from 21-22 Test Takers
Math Proficiency	63.5	64.6
Math Growth	41.5	74.3
Math Low 25	30.8	60.0
Overall High School Projection	659 (B)	723 (B)
Overall K-12 Projection	745 (B)	763 (A)

School B 18-19 (764 A)	Using High School Algebra 1 Data from 20-21 Test Takers	Using High School Algebra 1 Benchmark Data from 21-22 Test Takers
Math Proficiency	44.0	73.7
Math Growth	41.1	86.9
Math Low 25	25.9	57.4
Overall High School Projection	542 (D)	649 (B)
Overall K-12 Projection	708 (B)	739 (B)

School C 18-19 (775 A)	Using High School Algebra 1 Data from 20-21 Test Takers	Using High School Algebra 1 Benchmark Data from 21-22 Test Takers
Math Proficiency	38.6	54.0
Math Growth	34.4	80.2
Math Low 25	18.2	85.0
Overall High School Projection	531 (D)	659 (C)
Overall K-12 Projection	653 (B)	691 (B)

School D 18-19 (818 A)	Using High School Algebra 1 Data from 20-21 Test Takers	Using High School Algebra 1 Benchmark Data from 21-22 Test Takers
Math Proficiency	71.8	72.5
Math Growth	78.3	86.5
Math Low 25	42.5	68.8
Overall High School Projection	624 (C)	659 (B)
Overall K-12 Projection	757 (A)	765 (A)

So, with the 20-21 test takers, you see growth having an incredibly negative effect. This is completely logical because you are measuring growth from 2018-2019 7th grade math to 2020-2021 Algebra 1. Even in normal times you would see a drop in growth from 7th grade math to Algebra 1 because 7th grade math scores are regularly higher than 8th grade math. However, these were anything but normal times. The last quarter of the 2019-2020 school year was absolutely turned upside down due to the emergence of the pandemic. The 2020-2021 school year was a nightmare for educators and students across our state and the nation. Therefore, expecting students to show growth from pre-pandemic scores to in-pandemic scores is largely unrealistic. There was simply too much disruption to expect teachers and students to make gains during this time.

The benchmark data from the 21-22 test takers (our current 9th graders) shows growth increasing which is to be expected due to this being a measure from 20-21 8th grade math (in-pandemic) to 21-22 Algebra 1 (somewhat post-pandemic, the first semester of 21-22 was greatly disrupted by the pandemic as well.) No math pre-pandemic data is used in these calculations, and rightfully so since school's performance for this year should all be measured in respects to the effects of the pandemic. Not only growth shows vast differences, please check out the proficiency. Since our students have been in school more during this school year, you can see our students are performing at a much higher level.

If you look at the resulting high school projections, you can see that these Algebra 1 scores alone are incredibly damaging to the school's performance. Based on talking with other colleagues, I can see this having even more damaging effects to 7th-12th grade school configurations and especially traditional 9th-12th grade high schools.

Ultimately, I believe this proposed change will consequently communicate a negative message about the performance of schools with a 12th grade that is just flat-out inaccurate. Educators in the trenches across this great state in all types of schools have weathered a blistering storm due to the pandemic. Their efforts have been adequately called heroic by many across the state and nation. Following through with this proposed change will communicate to our public that these schools have performed very poorly, which is simply not the case. Current year performance data for our students shows that our teachers are getting the job done with helping our students rebound from an unprecedented era in their lives. Their efforts should be celebrated and reflected accurately. This proposed change does the opposite.

Thank you for the opportunity to comment. Please consider these comments when making such consequential decisions regarding our educators, students, and communities.

Respectfully,

Matt Thompson, Director of Federal Programs & Accountability

Union County School District

From: Rebecca Ladner <rebecca.ladner@lbsdk12.com>
Sent: Monday, April 11, 2022 12:42 PM
To: accreditation@mde12.org; Alan Burrow <ABurrow@mdek12.org>
Subject: Proposed APA Changes

Good afternoon,

Last year the State Board suspended grading policies in order to support schools due to disruptions from COVID. Now the state is proposing to use some of this same data in this year's accountability model. Using data from the students' last year of uninterrupted school (7th grade) to calculate growth from a year when education was continuously disrupted due to hybrid learning, quarantine, shut down due to the number of COVID cases, Hurricane Zeta, etc. (9th grade) is totally unequitable. The use of this data will not show the actuality of what schools are doing to mitigate the learning loss that took place.

Educators and students have been working diligently this school year to overcome the impact of two years of disrupted learning, even with COVID still lurking in the buildings and communities.

I ask that you make a decision that supports educators, instead of a decision that could create low morale for those who work tirelessly to ensure that our students are successful.

Respectfully,
Rebecca Ladner

--

Rebecca Ladner, M.Ed.
Assistant Principal
Long Beach High School

"The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution or use of the contents of this message is strictly prohibited. If you received this electronic message in error, please notify us immediately at (228-864-1146)."

From: Michael Watkins <mwatkins@okolona.k12.ms.us>
Sent: Monday, April 11, 2022 12:30 PM
To: Accreditation Shared
Subject: Accountability

Hello, I wanted to make a public comment on the decision that was made which would really affect my school in the accountability model. I come from one of the smaller schools in which we test all of our 9th graders in the 9th grade for Algebra I and Biology. If the task force team measured growth from when they were in the 7th grade, It would hurt us tremendously because it will still be off of their Covid year in which the community and students thought it wouldn't count. On the other hand, this year we are working very hard to get all the points we can as a school in every category of the model. My 9th graders this year are excited about testing because they are redeeming themselves from last year (8th grade), but their test will not count until they are in the tenth grade. Again my current 10th graders who test Algebra I last year tried their best but based on the unforeseen situation which was starting school after labor day, being virtual, and hybrid. I The growth wasn't there to give my students a fair shot in getting more points. Please consider another option that will be fair for all high schools when it comes to the students and how the task force will measure points for schools that this will hurt.

Thanks,

Michael A. Watkins
Principal
Okolona High School
Okolona, MS 38860
662-447-2362



Forrest County Agricultural High School

215 Old Highway 49 East, Brooklyn, MS 39425

Phone: (601) 582-4102

Fax: (601) 545-9483

Donna H. Boone, Ph.D.
Superintendent

Will Wheat
Principal

April 11, 2022

To Whom It May Concern:

I am writing to share my concerns regarding the proposed temporary revisions to the business rules of the Mississippi Statewide Accountability System while they are currently out for public comment.

The first proposed recommendation is for students with end-of-course assessments included in the accountability calculations during the 2021-2022 school year for growth. These students would be those who took Algebra I as 9th graders in the 2020-2021 school year or will take Algebra I as a 10th graders this year. The proposed temporary change will base their growth on their 7th grade score in 2018-2019. When these students were in 7th grade, our world was pre-pandemic.

In March 2020, our school campuses were closed for the remainder of that school year, and school districts were forced to find ways through technology and/or paper packets to keep students instructionally engaged. The following school year, 2020-2021, while the pandemic raged on in our world, we gave our families the option of receiving instruction for their students either in-person or virtually in order to keep their families safe. We were told to assess all students last year but those scores "would not" count. For grades 3-8, those scores will only be used as a baseline to measure growth for this school year. The members of the State Superintendent's Principal Advisory Group continually asked if MDE planned to bank the 2020-2021 Algebra scores to which they were told "we will circle back to that later." If this recommendation moves forward, the Algebra will indeed be the only scores that will count after all were told that these scores would not count.

I understand that Mississippi was given an accountability waiver at both the state and federal level during the 2020-2021 school year, but last year and even this year, our students have continued to be impacted by the pandemic. I feel that a better transition back to our accountability system, especially in the area of growth for high schools would be a "hold harmless" for this school year only. Our state A-F accountability system was passed during the 2013 legislative session, but in October 2014, the State Board of Education held school districts harmless during our assessment transition. Precedent has been set that during times of transition, we have awarded a better rating to those who earned it, but we have held schools and districts harmless for things that they could not control during these transitional times.

We also are adding a new U.S. History score this year for a new test that has never been part of the model which is another reason for a “hold harmless” provision.

Once the legislature enacted the A-F accountability model in the 2013 session, another law was passed that relied on these accountability ratings. In order to qualify to serve as a school district superintendent, an individual serving as a principal must be from an A or B school or have moved the school up a level and held it there or higher for three (3) years. There will be very few high school principals who will qualify to serve as a superintendent for three (3) or more years into the future if this recommendation for high school growth goes into effect.

In this same vein, we know that our students will perform better this year with in-person instruction, which may result in inflated growth scores for grades 3-8 since we are comparing “during pandemic” scores to “possibly the end” scores. Schools will look better this year using the growth calculation of 2020-2021 scores as a baseline. But we, as superintendents, know that next year for grades 3-8 will possibly hold a different picture since that jump in growth will not be sustainable. There will be fewer elementary and middle school principals who will qualify to serve as a superintendent after the 2022-2023 school year.

For most K-12 districts, the scores will even each side out – 3-8 versus 9-12, but for Forrest County Agricultural High School, we don’t have any 3-8 scores to provide additional growth to our accountability score. We only have our English II and Algebra I scores for growth. Those “during pandemic” and “possibly the end” pandemic scores are going to be compared to pre-pandemic scores. And those 9th graders who took the Algebra I assessment were told last year that the scores would not count and that they just had to “take” the test.

We, as superintendents, were told that we would be provided with impact data for high schools. I have yet to see the number of high schools in the state that would increase their accountability rating by using the proposed recommendation and those who would fall in their accountability rating. According to a member of the Accountability Task Force, every high school in the state would fall by at least 50 points if not more.

In closing, thank you for your consideration of being transparent in providing the impact data for high schools and for your consideration of a “hold harmless” provision. This would be consistent with the State Board of Education’s actions when school districts transitioned from PARCC to MAAP in 2016.

Sincerely,



Donna H. Boone, Ph.D.
Superintendent

From: Sarah Sanzin <sarah.sanzin@lbsdk12.com>
Sent: Monday, April 11, 2022 2:46 PM
To: Accreditation Shared; Alan Burrow
Subject: APA concerns/Accountability changes

Good afternoon,

Thank you for providing me the opportunity to voice my concerns about the recommended revisions to the business rules which will change the accountability system in our state.

As an assistant principal, it is my privilege and duty to advocate for my teachers and students. The 2019-2020 and 2020-2021 school years were like no others. During those unprecedented times, I can confidently say all Long Beach School District leadership/faculty/staff carefully planned, diligently taught, and graciously loved our students and families. In spite of our dedication, the instructional environment had been immensely impacted and learning was disrupted. Due to this impact, the banked test scores are not an accurate reflection of our teachers' abilities and students' mastery of the state standards. The scores are greatly flawed only due to the effects of the pandemic.

Knowing this truth, I believe that is why the Department of Education made the decision to give grace last year. I implore you to discard the banked scores and utilize this year's scores as the new baseline. As a nation, our teachers and students are ready to move forward and celebrate their current successes.

Thank you for taking the time to listen and consider my thoughts.

Sincerely,
Sarah Sanzin

--

Sarah Sanzin
Assistant Principal, Long Beach High School

"The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution or use of the contents of this message is strictly prohibited. If you received this electronic message in error, please notify us immediately at (228-864-1146)."

From: Luke Tentoni <ltentoni@nasd.ms>
Sent: Monday, April 11, 2022 3:06 PM
To: Accreditation Shared
Subject: Response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021

To whom it may concern:

I am writing in response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System. Please take time to read over the information included in this document. In the event you have further questions please feel free to contact me.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC "skip year" growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline ("letter grade cuts") for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let's first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce dramatically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where students lost skills the most. And with this proposal, it does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data across the subjects and different grade levels. This has nothing to do with the current

performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.
- Student’s performance was significantly lower during pandemic disruptions due to attendance of both the student and teacher

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.
- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.
- In our state anytime a student’s high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.

- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly **in 2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools' accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the "banked year" because of systematic rules?
- How do we as a district explain to administrators and teachers that the "targets" moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a "decision?"
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the "high school bridge" year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school's accountability would have been with this component that year. Originally, this component could not help a district or school, it could only punish them. The best each school could hope for was to not "lose points." This component by rule was incentivizing schools to not want to have EL students for accountability's sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as "off-topic" for the current items out for APA, I included this to show that we have tried "lack of common sense" rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 "in-pandemic" scores compared to "pre-pandemic" higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are "competing" with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to "play the game." There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.

Possible Solution

- In previous years, when new tests have been adopted in different subject areas, the scores did not count in accountability the first year of the new test. These were always used as transition years for

teachers and administrators to adapt to the elevated rigor in new curriculums and state assessments. In these instances, school's scores from the previous year in these areas were used for accountability purposes. With the variances in virtual school, attendance, and all other discrepancies with the pandemic, this type of common sense calculation would be an option. All scores could be calculated in proficiency and growth; if the calculations help schools and districts, allow those schools and districts to use the higher grade level. If the calculation negatively impacts schools or districts, let those schools and districts keep their previously obtained letter grade level. This is fair and consistent for all schools and districts as it removes any ambiguity and the many differences each individual school district dealt with during the pandemic. Each school had its own problems and responses to those problems during the pandemic.

Better options presented in the Accountability Task Force meetings:

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.
- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the "pool" for ATSI and TSI (especially with lower 2020-2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when

identifying school improvement. The USDE guidance clearly allows this as B-7 says *"For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators."* How would we calculate total points? Either equate them to the 1000 scale from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn't change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.



Luke Tentoni, M.Ed.

**Assistant Principal
New Albany High School**

Work: (662) 534-1805

Fax: (662) 534-1817

#NADogs2theTop

From: April Hobson <ahobson@nasd.ms>
Sent: Monday, April 11, 2022 3:42 PM
To: Accreditation Shared
Subject: Letter in Response to APA Request Concerning Proposed Revisions to Accountability Standards

April 11, 2022

To whom it may concern:

I am writing in response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System. Please take time to read over the information included in this document. In the event you have further questions please feel free to contact me.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let’s first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce dramatically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where students lost skills the most. And with this proposal, it

does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data across the subjects and different grade levels. This has nothing to do with the current performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.
- Student’s performance was significantly lower during pandemic disruptions due to attendance of both the student and teacher

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.
- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.
- In our state anytime a student’s high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the

precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.

- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly in **2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools' accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the "banked year" because of systematic rules?
- How do we as a district explain to administrators and teachers that the "targets" moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a "decision?"
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the "high school bridge" year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school's accountability would have been with this component that year. Originally, this component could not help a district or school, it could only punish them. The best each school could hope for was to not "lose points." This component by rule was incentivizing schools to not want to have EL students for accountability's sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as "off-topic" for the current items out for APA, I included this to show that we have tried "lack of common sense" rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 "in-pandemic" scores compared to "pre-pandemic" higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are "competing" with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to "play the game." There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.

Possible Solution

- In previous years, when new tests have been adopted in different subject areas, the scores did not count in accountability the first year of the new test. These were always used as transition years for teachers and administrators to adapt to the elevated rigor in new curriculums and state assessments. In these instances, school's scores from the previous year in these areas were used for accountability purposes. With the variances in virtual school, attendance, and all other discrepancies with the pandemic, this type of common sense calculation would be an option. All scores could be calculated in proficiency and growth; if the calculations help schools and districts, allow those schools and districts to use the higher grade level. If the calculation negatively impacts schools or districts, let those schools and districts keep their previously obtained letter grade level. This is fair and consistent for all schools and districts as it removes any ambiguity and the many differences each individual school district dealt with during the pandemic. Each school had its own problems and responses to those problems during the pandemic.

Better options presented in the Accountability Task Force meetings:

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.
- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the "pool" for ATSI and TSI (especially with lower 2020-

2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when identifying school improvement. The USDE guidance clearly allows this as B-7 says *"For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators."* How would we calculate total points? Either equate them to the 1000 scale from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn't change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.

April Hobson

Director, New Albany School of Career & Technical Education

203 Hwy 15 N, New Albany, MS 38652

ahobson@nasd.ms

--

April W. Hobson, Ed.S., NCC, NCSC

Director

New Albany Career & Technical Center

From: Cody Killen <ckillen@newton.k12.ms.us>
Sent: Monday, April 11, 2022 3:43 PM
To: Accreditation Shared
Subject: Accountability 2022

First off, I am in favor of accountability. Actually, I enjoy accountability; however, I feel the options that are available could benefit some schools more than others. Example: Some schools offer Algebra I in the 8th grade. The students that were in the 8th grade in 2019-2020 did not test. It is my understanding that students in this category are going to be able to count their 7th grade math scores for growth and proficiency. Based on cut scores, this grade level/subject (7th Math) is the easiest level in which to show growth and proficiency which creates an unfair advantage for schools who offer 8th graders Alg I.

Also, holding schools and administrators accountable for scores (bank Alg I scores) from the 2020-2021 SY is not the greatest idea. Many students (sadly some teachers as well) did not take the test seriously as they were told the test would not count. Not everyone had this mentality but some did. This growth, for 9th graders from 2020-2021, will be calculated from their 7th grade math scores. Again, proving more difficult to show growth from 7th grade solely based on cut score. The curriculum is also vastly different.

Lastly, data is pointing to quite the regression for ELA. Again, this data is being compared to 7th grade ELA data. Granted, we should show a regression based on the fact we navigated a pandemic, and our teachers have worked tirelessly at combating the learning loss. I am afraid this is going to be so disheartening for our teachers.

Thank you for looking at these concerns as well as asking for comment.



"Make Progress, Not Excuses"

Cody C. Killen, Ed.S.

16255 MS-503, Decatur, MS 39327

601-635-3347

From: Justin Sutton <justin.sutton@lbsdk12.com>
Sent: Monday, April 11, 2022 4:05 PM
To: Accreditation Shared
Subject: Public Comment Concerning Recommended Revisions to Business Rules of the Mississippi Statewide Accountability System

Ms. Kitchens,

I am writing you concerning the proposed revisions to the business rules of the Mississippi Statewide Accountability System, and specifically, the use of data from the 2018-2019 school year in an attempt to complete the accountability model for 1000-point schools and the issues that stand to be created from these changes for 1000-point schools and to 700-point schools.

The 2020-2021 school year presented a set of circumstances and challenges never before faced by educators or students in Mississippi. Due to COVID-19, no two schools had similar school years. Each school had its own number of students quarantined due to COVID-19 exposure. Each school had varying numbers of students who participated in only virtual learning. Each school had a different number of school days that ran a hybrid schedule. Some schools, such as Long Beach High School, had to completely close in-person learning for a period of time. Each school had to provide a safe learning environment in the best way that it could, and no two schools had similar experiences or results.

While all schools do have different events that force closures, such as hurricanes on the Coast or winter weather in northern parts of the state, the impact of these closures can be somewhat expected and mitigated. This was not possible with COVID-19. Given these varying circumstances, the argument that a fair for all accountability model can be created reflecting data from the 2020-2021 school year should be dismissed out of hand.

Should one determine that such a model could be fairly implemented, the issue of selecting appropriate data for the model remains. The use of banked scores means data from last school year, with the world still in the midst of a pandemic, will be measured against scores from a time without the impact of a pandemic. This is concerning as it will create an artificial deflation of growth calculations for 1000-point schools. Even if legacy scores are used in this growth calculation to avoid this, it will present a false picture of the impact of COVID-19 on schools. While 700-point schools will have two data points from the time period after the onset of the pandemic, they will show an unsustainable growth which may wrongly imply that the impact of COVID-19 on learning and education in general has been overcome.

Lastly, the changing of business rules, for one year only, implies that a model that has been designed to be a constant in terms of accountability, will be anything but a constant.

The fact is that the world of education still does not resemble the world of education before the onset of COVID-19. Even just this school year, schools had to navigate through the challenges of the Delta and Omicron spikes. Should the goal of this process be to measure the impact of COVID-19 on learning, there are many other metrics that can paint a more accurate picture. I would encourage decision makers to create new baselines from the data collected this year to best assess how schools are navigating the waters as we hopefully start to emerge from this pandemic.

Sincerely,

Justin Sutton
Principal

"The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution or use of the contents of this message is strictly prohibited. If you received this electronic message in error, please notify us immediately at (228-864-1146)."

To whom it may concern:

I am writing in response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System. Please take time to read over the information included in this document. In the event you have further questions please feel free to contact me.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let’s first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce dramatically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where

students lost skills the most. And with this proposal, it does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data across the subjects and different grade levels. This has nothing to do with the current performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.
- Student’s performance was significantly lower during pandemic disruptions due to attendance of both the student and teacher

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.

- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.
- In our state anytime a student’s high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.
- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly in **2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools’ accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the “banked year” because of systematic rules?
- How do we as a district explain to administrators and teachers that the “targets” moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a “decision?”
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the “high school bridge” year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school’s accountability would have been with this component that year. Originally, this

component could not help a district or school, it could only punish them. The best each school could hope for was to not “lose points.” This component by rule was incentivizing schools to not want to have EL students for accountability’s sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as “off-topic” for the current items out for APA, I included this to show that we have tried “lack of common sense” rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 “in-pandemic” scores compared to “pre-pandemic” higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are “competing” with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to “play the game.” There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.

Possible Solution

- In previous years, when new tests have been adopted in different subject areas, the scores did not count in accountability the first year of the new test. These were always used as transition years for teachers and administrators to adapt to the elevated rigor in new curriculums and state assessments. In these instances, school’s scores from the previous year in these areas were used for accountability purposes. With the variances in virtual school, attendance, and all other discrepancies with the pandemic, this type of common sense calculation would be an option. All scores could be calculated in proficiency and growth; if the calculations help schools and districts, allow those schools and districts to use the higher grade level. If the calculation negatively impacts schools or districts, let those schools and districts keep their previously obtained letter grade level. This is fair and consistent for all schools and districts as it removes any ambiguity and the many differences each individual school district dealt with during the pandemic.

Each school had its own problems and responses to those problems during the pandemic.

Better options presented in the Accountability Task Force meetings:

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.
- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the "pool" for ATSI and TSI (especially

with lower 2020-2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when identifying school improvement. The USDE guidance clearly allows this as B-7 says *"For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators."* How would we calculate total points? Either equate them to the 1000 scale from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn't change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.

John Ferrell

Asst. Superintendent, New Albany School District

301 Hwy 15 North

jferrell@nasd.ms

To whom it may concern:

I am writing in response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System. Please take time to read over the information included in this document. In the event you have further questions please feel free to contact me.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let’s first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce dramatically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where

students lost skills the most. And with this proposal, it does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data across the subjects and different grade levels. This has nothing to do with the current performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.
- Student’s performance was significantly lower during pandemic disruptions due to attendance of both the student and teacher

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.

- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.
- In our state anytime a student’s high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.
- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly **in 2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools’ accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the “banked year” because of systematic rules?
- How do we as a district explain to administrators and teachers that the “targets” moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a “decision?”
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the “high school bridge” year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school’s accountability would have been with this component that year. Originally, this

component could not help a district or school, it could only punish them. The best each school could hope for was to not “lose points.” This component by rule was incentivizing schools to not want to have EL students for accountability’s sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as “off-topic” for the current items out for APA, I included this to show that we have tried “lack of common sense” rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 “in-pandemic” scores compared to “pre-pandemic” higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are “competing” with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to “play the game.” There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.

Possible Solution

- In previous years, when new tests have been adopted in different subject areas, the scores did not count in accountability the first year of the new test. These were always used as transition years for teachers and administrators to adapt to the elevated rigor in new curriculums and state assessments. In these instances, school’s scores from the previous year in these areas were used for accountability purposes. With the variances in virtual school, attendance, and all other discrepancies with the pandemic, this type of common sense calculation would be an option. All scores could be calculated in proficiency and growth; if the calculations help schools and districts, allow those schools and districts to use the higher grade level. If the calculation negatively impacts schools or districts, let those schools and districts keep their previously obtained letter grade level. This is fair and consistent for all schools and districts as it removes any ambiguity and the many differences each individual school district dealt with during the pandemic.

Each school had its own problems and responses to those problems during the pandemic.

Better options presented in the Accountability Task Force meetings:

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.
- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the "pool" for ATSI and TSI (especially

with lower 2020-2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when identifying school improvement. The USDE guidance clearly allows this as B-7 says *"For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators."* How would we calculate total points? Either equate them to the 1000 scale from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn't change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.

A handwritten signature in black ink, appearing to read "Lance Evans", with a stylized, flowing script.

Lance Evans, Ed.D.
Superintendent
New Albany School District
levans@nasd.ms
Cell # (662) 538-5226

To whom it may concern:

I am writing in response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System. Please take time to read over the information included in this document. In the event you have further questions please feel free to contact me.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let’s first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce dramatically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where students lost skills the most. And with this proposal, it does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data

across the subjects and different grade levels. This has nothing to do with the current performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.
- Student’s performance was significantly lower during pandemic disruptions due to attendance of both the student and teacher

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.
- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.
- In our state anytime a student's high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.
- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly **in 2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools' accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the "banked year" because of systematic rules?
- How do we as a district explain to administrators and teachers that the "targets" moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a "decision?"
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the "high school bridge" year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school's accountability would have been with this component that year. Originally, this component could not help a district or school, it could only punish them. The best each school could hope for was to not "lose points." This component by rule was incentivizing schools to not want to have EL students for accountability's sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as "off-topic" for the current items out for APA, I included this to show that we have tried "lack of common sense"

rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 “in-pandemic” scores compared to “pre-pandemic” higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are “competing” with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to “play the game.” There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.

Possible Solution

- In previous years, when new tests have been adopted in different subject areas, the scores did not count in accountability the first year of the new test. These were always used as transition years for teachers and administrators to adapt to the elevated rigor in new curriculums and state assessments. In these instances, school’s scores from the previous year in these areas were used for accountability purposes. With the variances in virtual school, attendance, and all other discrepancies with the pandemic, this type of common sense calculation would be an option. All scores could be calculated in proficiency and growth; if the calculations help schools and districts, allow those schools and districts to use the higher grade level. If the calculation negatively impacts schools or districts, let those schools and districts keep their previously obtained letter grade level. This is fair and consistent for all schools and districts as it removes any ambiguity and the many differences each individual school district dealt with during the pandemic. Each school had its own problems and responses to those problems during the pandemic.

Better options presented in the Accountability Task Force meetings:

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force

meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.

- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the "pool" for ATSI and TSI (especially with lower 2020-2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when identifying school improvement. The USDE guidance clearly allows this as B-7 says *"For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators."* How would we calculate total points? Either equate them to the 1000 scale

from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn't change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.

Dr. Avence Pittman Jr.

Director of Alternative Education

915 Denmill Rd., New Albany, MS 38652

apittman@nasd.ms

TISHOMINGO COUNTY SCHOOL DISTRICT
Christie Holly
SUPERINTENDENT OF EDUCATION

April 11, 2022

To the Mississippi State Board of Education and Dr. Wright,

I am writing in regards to the recommendations to revise the business rules of the Mississippi Statewide Accountability System, Section 10, Banking Scores: End-of-course, subject area assessments taken before 10th grade.

The current recommendation proposes using 2018-2019 assessment data to calculate growth for students who have a banked score from 2020-2021. These students do not have a prior-year score due to the suspension of assessments in 2019-2020. While I understand this poses a problem for calculations under our current accountability model and current business rules, the question I must ask is this: do we as educators work for the model or does the model work for us?

It feels that this attempt to "validate" a score for a student in order to report a letter grade to our communities (that is statistically invalid, by the way) goes against the very nature of a teacher and education itself. As educators, we strive to meet students where they are, to support their learning process and the pace of that learning, and to validate their learning through achievement and growth. Using 2018-2019 data with students who skipped a year of assessments and then took a test last year that was irrelevant (as it was announced to the state those scores would not count against a student) is an injustice to the student and especially the student's teachers. In math particularly, using a child's 7th grade math score from 2018-2019 to measure their growth to Algebra I in 2021-2022 as 9th graders cannot be valid. The content differences alone in these two subjects make measuring growth in any kind of valid way impossible. Secondly, when that 9th grade student took the test in 2021-2022, he/she knew it would not count for his/her personal accountability, nor the school's accountability, nor the district's accountability. The test automatically becomes a statistical anomaly. The recommendation to try to statistically "connect" a 7th grade math score to a "non-counting" Algebra I math score is not responsible.

As you all know, our teachers and students have endured the most disruptive two and half years in public education I dare say since it's beginning. While other states stayed home, Mississippi students and teachers came to school. Those school days were full of COVID protocols, mask wearing, social distancing, virtual learning, fear, anxiety, absences, quarantines, and yes, even death of loved ones. To the hard work of these stakeholders – OUR PEOPLE – we must be true! Their sacrifice and hard work throughout this pandemic cannot be slighted by the

1620 PAUL EDMONDSON DRIVE, IUKA, MS 38852
PHONE: 662-423-3206 FAX: 662-424-9820
www.tcsk12.com

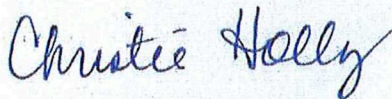
TISHOMINGO COUNTY SCHOOL DISTRICT
Christie Holly
SUPERINTENDENT OF EDUCATION

desire to make an accountability model's "boxes" all work out. This pandemic does not fit in a box. The work our people have done does not fit in a box. To try and make it work for the accountability model's sake is a huge disservice to our people, not to mention, it is not statistically valid. Even this year (2021-2022) has been disruptive with major COVID spikes in August and again in January. Our children have not had the opportunity to have a normal school year since 2019.

If the state must publish data from this year to the public as required by USDE, then so be it. The state board should support our people and freeze the letter grades another year in order to provide a more accurate data baseline moving forward. Another suggestion would be to run the model with available data and schools/districts get the higher of the two letter grades (2018-2019 or current). I understand the pandemic happened in Mississippi just as it happened in every state of our nation. However, that does not demand that we throw the work and sacrifice of our people under the proverbial "bus" for the sake of an accountability model. Again, I ask the question: do we work for the model or does the model work for us? The model should be a system that shows a true reflection of the school and district. While I can argue the model does not always do that, it assuredly will not be a reflection of any school or district in our state this year.

As always, I respect the important work of the Mississippi State Board of Education and Dr. Wright. I ask that these considerations be taken into account before making the decision to move forward with the current recommendation.

Respectfully,



Christie Holly
Superintendent of Tishomingo County School District

Dr. David Daigneault
Superintendent

Post Office Box 1940
Grenada, Mississippi 38902-1940



Telephone
(662) 226-1606

FAX
(662) 226-7994

April 11, 2022

Angela Kitchens
Office of Accreditation
359 North West Street
Post Office Box 771
Jackson, MS 39205-0771

Dear Mrs. Kitchens:

Over the past two years, the students, teachers, staff, parents, community, and administrators of Grenada School District (GSD) have been greatly impacted by the COVID-19 pandemic. Even though we had hoped to see improvements during the current school year, our data shows a different story.

Grenada School District has seen an increase in positive cases with faculty, staff, and students this year (671) compared to the 2020-2021 school year (286). Grenada School District has quarantined a total of 2,772 students this year, which is much greater than last year's 1,870. With the new strand being more contagious and with so many positive cases among our faculty and staff, GSD had to make the tough decision at one point to shift the entire district to virtual learning. As Covid has shown us, face-to-face instruction is the best way to educate our students; however, due to the continued impacts of the pandemic, our children have had to receive instruction virtually throughout the year. The 2021-2022 school year has not been a normal year. We have faced many challenges.

We hope this helps paint the picture for why Grenada School District would like the opportunity to express our sincere concern regarding the revisions recommended to the business rules that impact the Mississippi Statewide Accountability System.

Several concerns include the following:

- Utilizing banked scores from the 2020-2021 school year in Algebra I and Biology will be detrimental to accountability scores. Those assessments were waived for graduation and accountability during the 2020-2021 school year, so it will be difficult to explain to our teachers, parents, and students why those scores would be applied to the current model. Those assessment scores are also much lower than the past which is severely impacting our accountability for this year.

Letter to Angela Kitchens
Office of Accreditation
April 11, 2022
Page Two

- Growth being measured using the pre-covid 2018-2019 school-year scores in Algebra I and English II is going to be detrimental to our accountability scores.
- Utilizing ACT scores to calculate the College and Career Readiness indicator will severely impact our high school and district. Again, the ACT scores that will be used in this area of the accountability model are from 2020-2021, a pandemic year.

Grenada School District utilizes CASE benchmark assessments throughout the year to monitor our progress towards the accountability model. We are seeing a severe drop in growth scores at the high school level when utilizing the bank scores for Algebra I and Biology along with the 7th grade scores for growth in English II and Algebra I.

Grenada School District recommends making minimal changes to the business rules by allowing districts and schools to publish and use the higher score between the two accountability models from the 2018-2019 or the current year, 2021-2022.

Our administrator, teachers, parents, students, and community will be significantly impacted by this drop.

Sincerely,

A handwritten signature in blue ink, reading "Dr. David Daigneault". The signature is fluid and cursive, with the first name "David" being particularly prominent.

Dr. David Daigneault
Grenada School District, Superintendent

To whom it may concern:

I am writing in response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System. Please take time to read over the information included in this document. In the event you have further questions please feel free to contact me.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let’s first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce dramatically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where

students lost skills the most. And with this proposal, it does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data across the subjects and different grade levels. This has nothing to do with the current performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.
- Student’s performance was significantly lower during pandemic disruptions due to attendance of both the student and teacher

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.

- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.
- In our state anytime a student’s high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.
- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly in **2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools’ accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the “banked year” because of systematic rules?
- How do we as a district explain to administrators and teachers that the “targets” moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a “decision?”
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the “high school bridge” year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school’s accountability would have been with this component that year. Originally, this

component could not help a district or school, it could only punish them. The best each school could hope for was to not “lose points.” This component by rule was incentivizing schools to not want to have EL students for accountability’s sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as “off-topic” for the current items out for APA, I included this to show that we have tried “lack of common sense” rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 “in-pandemic” scores compared to “pre-pandemic” higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are “competing” with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to “play the game.” There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.

Possible Solution

- In previous years, when new tests have been adopted in different subject areas, the scores did not count in accountability the first year of the new test. These were always used as transition years for teachers and administrators to adapt to the elevated rigor in new curriculums and state assessments. In these instances, school’s scores from the previous year in these areas were used for accountability purposes. With the variances in virtual school, attendance, and all other discrepancies with the pandemic, this type of common sense calculation would be an option. All scores could be calculated in proficiency and growth; if the calculations help schools and districts, allow those schools and districts to use the higher grade level. If the calculation negatively impacts schools or districts, let those schools and districts keep their previously obtained letter grade level. This is fair and consistent for all schools and districts as it removes any ambiguity and the many differences each individual school district dealt with during the pandemic.

Each school had its own problems and responses to those problems during the pandemic.

Better options presented in the Accountability Task Force meetings:

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.
- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the "pool" for ATSI and TSI (especially

with lower 2020-2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when identifying school improvement. The USDE guidance clearly allows this as B-7 says *"For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators."* How would we calculate total points? Either equate them to the 1000 scale from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn't change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.

Matt Buchanan

Principal

New Albany High School

201 HWY 15 N

New Albany, MS 38652

mbuchanan@nasd.ms

Handwritten signature of Matt Buchanan and the date 4/11/22.

To whom it may concern:

I am writing in response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System. Please take time to read over the information included in this document. In the event you have further questions please feel free to contact me.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let’s first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce dramatically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where

students lost skills the most. And with this proposal, it does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data across the subjects and different grade levels. This has nothing to do with the current performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.
- Student’s performance was significantly lower during pandemic disruptions due to attendance of both the student and teacher

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.

- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.
- In our state anytime a student’s high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.
- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly in **2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools’ accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the “banked year” because of systematic rules?
- How do we as a district explain to administrators and teachers that the “targets” moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a “decision?”
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the “high school bridge” year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school’s accountability would have been with this component that year. Originally, this

component could not help a district or school, it could only punish them. The best each school could hope for was to not “lose points.” This component by rule was incentivizing schools to not want to have EL students for accountability’s sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as “off-topic” for the current items out for APA, I included this to show that we have tried “lack of common sense” rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 “in-pandemic” scores compared to “pre-pandemic” higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are “competing” with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to “play the game.” There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.

Possible Solution

- In previous years, when new tests have been adopted in different subject areas, the scores did not count in accountability the first year of the new test. These were always used as transition years for teachers and administrators to adapt to the elevated rigor in new curriculums and state assessments. In these instances, school’s scores from the previous year in these areas were used for accountability purposes. With the variances in virtual school, attendance, and all other discrepancies with the pandemic, this type of common sense calculation would be an option. All scores could be calculated in proficiency and growth; if the calculations help schools and districts, allow those schools and districts to use the higher grade level. If the calculation negatively impacts schools or districts, let those schools and districts keep their previously obtained letter grade level. This is fair and consistent for all schools and districts as it removes any ambiguity and the many differences each individual school district dealt with during the pandemic.

Each school had its own problems and responses to those problems during the pandemic.

Better options presented in the Accountability Task Force meetings:

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.
- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the "pool" for ATSI and TSI (especially

with lower 2020-2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when identifying school improvement. The USDE guidance clearly allows this as B-7 says *"For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators."* How would we calculate total points? Either equate them to the 1000 scale from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn't change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.

Paul Henry

Principal, New Albany Middle School

400 Apple Street, New Albany, MS 38652

New Albany School District

pHenry@nasd.ms

To whom it may concern:

I am writing in response to the APA request concerning the Proposed Revisions to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2021 specifically the business rules of the Mississippi Statewide Accountability System. Please take time to read over the information included in this document. In the event you have further questions please feel free to contact me.

RE: The recommendations are to revise the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)*.

The changes that were recommended for School Improvement specifically were positive, needed, and data sound changes. These changes should be made final.

The changes that were recommended for End of Course assessments, specifically using the 2020-2021 banked results in proficiency and growth numerator calculations, along with using the 7th grade score from 2018-2019 as the baseline for EOC “skip year” growth, will result in skewed data that is un-comparable to previous years and the other scales for the current year, a likely resetting of the baseline (“letter grade cuts”) for the 1000 scale and then possibly the 700/district scale for the next two years of accountability, questions of communication, inequity across the state and unintended consequences going forward. These are the reasons the majority of the Accountability Task Force did not approve of what was presented to the state board. Other options were presented by the Accountability Task Force and those will be discussed in this statement in detail.

Let’s first talk about what is wrong with the current proposal based on each result that will likely happen.

Skewed Data that is un-comparable to previous years and the other scales for the current year:

- Based on what was approved by the state board to go out for APA, high school growth will be comparing **post-pandemic** (2021-2022) scores to **pre-pandemic** (2018-2019) scores for English II in most cases because of the 7th grade baseline decision. Because of the banking decision, it will be comparing **in-pandemic** (2020-2021) scores to **pre-pandemic** (2018-2019) scores in most cases for Algebra I. And the **pre-pandemic** grade level will be changed in most cases from 8th grade to 7th grade which will produce dramatically different data from earlier years. This is because 7th grade math is much higher in the state of Mississippi than 8th grade math. Now you are comparing much lower in-pandemic data against much higher pre-pandemic data that has never been compared to previously as skip year growth and at such a wide scale. And to add insult, the banked subject for growth is mainly math, which all national data shows is where

students lost skills the most. And with this proposal, it does not give a year to recoup some of these losses as grade 3-8 and Eng II will get. This creates un-comparable data across the subjects and different grade levels. This has nothing to do with the current performance of the student, teacher, school, or district. This is because of the system setup and the associated timing.

- Grade 3-8 growth for 2021-2022 will be comparing “post-pandemic” scores to “in-pandemic” scores. This will allow for an opportunity for good growth and extremely high growth in certain settings.
- Combining the previous two bullets will obviously cause different, skewed data that is not comparable to other scales or previous years and has nothing to do with actual student performance for the 2021-2022 year.
- Student’s performance was significantly lower during pandemic disruptions due to attendance of both the student and teacher

A likely resetting of the baseline (letter grade cuts) for the 1000 scale and then possible the 700/district scale for the next two years of accountability:

- Because of the issues described in the previous section, many high schools will lose anywhere from 80-300 total points from their 2018-2019 points on the 1000 point scale system. This will result in a high proportion of schools being D’s and F’s with the current letter grade cuts. This will also result in many more labeled TSI and ATSI. Possibly so many that the MDE cannot even manage the requirements. This means the 1000 scale letter grade cut will have to get reset.
- Because there is an opportunity for high growth on the 700 scale based on the reasons discussed in the previous section, you will likely find a very high proportion of schools being A’s and B’s on this scale. In 2018-2019, 22% of the 700 scale were A’s and it is very likely this number goes up in 2021-2022.
- How can we on one slide to the state board show that we had to lower the letter grade cuts to get to 10% A’s, etc., while showing that we had 30% A’s on the next slide for the other scale and say this is because of **current** student performance? It will be because of the systematic rules and the associated timing with those rules that caused this. It will have very little to do with current student performance.
- If we fast forward to 2022-2023, the reverse will happen for each scale. The 1000 scale now becomes the scale with a potential for growth because in-pandemic scores from 2020-2021 will set the baseline for End of Course high school 2021-2022 or 2022-2023 post-pandemic scores. The 700 scale growth will likely not be as high in 2022-2023 even though proficiency will likely increase (which will be really tough to explain as “real” data). This is not because growth will not be high in 2022-2023. It will just not be as high as 2021-2022 for many schools on the 700 scale as it cannot be from a data standpoint. Growth is the majority of the 700 scale model so this will outweigh any slight proficiency increase. This could result in both letter grade cuts getting reset again next year.

- The district scale will likely get reset anytime the 1000 and 700 scales get reset, so we very likely end up with all three scales being reset two years in a row. How can we possibly say this is “comparable to previous years,” is “real data not masking anything,” and “keeps the adjustments to a minimum?”

Questions of communication:

- In January 2021, the state board announced that there would be no official accountability in 2020-2021. It was also announced that students would have their graduation and promotion requirements tied to state assessments waived. This was due to reasons such as lost instruction days the previous spring and in the current year, so many students learning virtually, teachers not able to teach based on the best instruction methods because safety superseded, not enough time had occurred to recoup lost skills, and so many other reasons.
- In our state anytime a student’s high school assessment graduation requirement was waived, the score did not count to district or school accountability without another option as an alternative. This is the precedent for obvious reason. It is common sense that this is how it should be. This is the previous precedent set even when students and teachers are not dealing with a pandemic.
- Putting the first two bullets in this section together, the implication was these scores cannot count in accountability in any year. If this was not true, this should have been directly stated publicly **in 2020-2021** since this would have contradicted previous precedent and common sense.
- Now, the very next year, a major portion of high schools’ accountability will come from that very data that was waived for all those reasons in the first bullet in this section if what is currently in APA is approved.
- How do we as a district explain to students, parents, and teachers that what they have done this year, cannot possibly overcome the results from last year, that were never supposed to count anyway, because they are scores from during the pandemic?
- How do we as a district tell teachers that they are not being punished simply because they teach 9th grade, the “banked year” because of systematic rules?
- How do we as a district explain to administrators and teachers that the “targets” moved when letter grade cuts are likely reset at all levels **after** the school year was over because of a “decision?”
- How do we do this and then tell teachers that that the system is not set up against them?
- For those that have been in this state since 2015, we remember the “high school bridge” year. It is infamous. This formula would bridge PARCC to MAAP results for growth. The result was skewed, flawed data changing levels from previous scores reported for students and parents. This was quickly realized and changed during the internal review window. You may also remember the first version of the EL component a few years ago. Impact data was calculated using this component to show what each school’s accountability would have been with this component that year. Originally, this

component could not help a district or school, it could only punish them. The best each school could hope for was to not “lose points.” This component by rule was incentivizing schools to not want to have EL students for accountability’s sake, which clearly should not be what the accountability model does. This was quickly changed before it officially impacted accountability. Before this bullet is counted as “off-topic” for the current items out for APA, I included this to show that we have tried “lack of common sense” rules before that someone thought might work. If what is proposed now passes, this would rival these two previous errors and I might even say surpass them.

Inequity across the state and unintended consequences going forward:

- 2021-2022 High School Low Performing Growth will suffer the most compared to 2018-2019 since national data shows that lower performing students lost more math skills during the pandemic, generally speaking. A lot of ground may have been gained in 2021-2022 for low performing math students, but that will not be factored in 2021-2022 accountability since 2020-2021 “in-pandemic” scores compared to “pre-pandemic” higher 7th grade scores will make up almost all of that category.
- If you look at the participation class rates for high schools for Algebra I and Biology I, you will find some huge discrepancies. Lower percentages mean a substantial number of students did not test. These schools could be rewarded with the current plan to use the 2020-2021 banked results in 2021-2022 accountability, especially if districts and schools are “competing” with each other as letter grade cuts get reset. There is a high correlation for students that did not come test being virtual. The national and state data conversation is that virtual students did not perform as well as in-person students overall which is why the MDE recommended in-person learning this year. The message this sends to schools may be an unintended consequence to “play the game.” There could be districts that tried their best to follow the MDE directive to strongly encourage students to test but the message going forward based on this decision remains the same.

Possible Solution

- In previous years, when new tests have been adopted in different subject areas, the scores did not count in accountability the first year of the new test. These were always used as transition years for teachers and administrators to adapt to the elevated rigor in new curriculums and state assessments. In these instances, school’s scores from the previous year in these areas were used for accountability purposes. With the variances in virtual school, attendance, and all other discrepancies with the pandemic, this type of common sense calculation would be an option. All scores could be calculated in proficiency and growth; if the calculations help schools and districts, allow those schools and districts to use the higher grade level. If the calculation negatively impacts schools or districts, let those schools and districts keep their previously obtained letter grade level. This is fair and consistent for all schools and districts as it removes any ambiguity and the many differences each individual school district dealt with during the pandemic.

Each school had its own problems and responses to those problems during the pandemic.

Better options presented in the Accountability Task Force meetings:

- Asking the USDE to forego banking for 2021-2022 accountability in the one-year amendment process was another option presented in the Accountability Task Force meetings. The Accountability Task Force actually approved this method by a vote of 11-3. B-2 on the USDE guidance says *"An SEA may elect to define a new method of annual meaningful differentiation for one year."* This seems to be something states can consider as #8 in the Introduction says *"Strategies for **continuous improvement to the State's assessment system**, including enhancing the ability to provide more timely, meaningful reporting to educators and parents and supporting educator assessment literacy and development;..."*. Counting the scores when and where the student took them (timely) is the option that will actually show what the state board is after, which is where students are **now**. All scores for all grade levels (3-9) besides current 10th grade (so Eng II) would be post-pandemic compared to in-pandemic which produces consistent data comparable to previous years and to the other scales. While this issue could be related to not having a test that all students take in grade 10 or higher, the guidance seems to indicate this is the year the USDE might consider allowing this, taking into account all the issues already presented. However, if the USDE after being asked determines a new test in a higher math/science course would be necessary to do this in the one-year amendment process, this option cannot be considered. Admittedly, this could cause an issue next year where you likely must use the same scores two years in a row. However, this is still a better option than the current recommendation since it produces reliable, consistent data. This would not require the 1000 scale and therefore the other scales to be reset. The letter grade cuts could be exactly what students and teachers have been working toward all year.
- No high school growth at all was an option presented at the last Accountability Task Force meeting. B-3 on the USDE guidance clearly says we can do this since we "cannot calculate it with reliability." While this doesn't help the banking results from 2020-2021 being used, it does limit them to proficiency. Could we use options 1 or 2 with 3 in combination? This method is not as preferred as options 1 and 2 because this **could** cause a reset of letter grade cuts since the results will not be comparable to previous years with such a major change to the model. It is possible this would **not** cause letter grade cuts reset though from a data standpoint based on preliminary data. However, we are going to have to reset cuts with the current proposal anyway and then likely reset next year again because the growth is not comparable to previous years with in-pandemic scores being compared to pre-pandemic scores for a different grade level (8th vs 7th) with skip year growth (as already pointed out). Another positive factor for this option is that many high schools in the state do not meet the minimum n-count requirements when growth is included to be in the "pool" for ATSI and TSI (especially

with lower 2020-2021 participation rates at some schools), combined with most issues revolving around calculating growth (besides banking proficiency), then it could be the best course is to not have growth at all when identifying school improvement. The USDE guidance clearly allows this as B-7 says *"For example, an SEA may determine that, due to the impact of COVID-19, for the 2021-2022 school year it cannot calculate a growth measure with sufficient validity, reliability, and comparability across schools and subgroups and therefore needs to make a temporary adjustment to its accountability indicators."* How would we calculate total points? Either equate them to the 1000 scale from the 600 total points like we already do for the 600 scale to the 700 scale or weight the other categories at Reading Proficiency-175, Math Proficiency-175, Graduation Rate-350, CCR-75, Acceleration-75, Biology I Proficiency-75, U.S. History Proficiency-75. Take 10 points from Reading Proficiency, Math Proficiency, and Graduation Rate. Take five points from CCR, Acceleration, Biology I Proficiency, and U.S. History Proficiency if the school has EL. The 700 and district scale doesn't change with this. This only applies to the 1000 point scale. Districts have grade 3-8 growth factored in. Dr. Chris Domaleski at the Accountability Task Force meeting said the USDE would approve this.

Thank you for your consideration. We really appreciate the ability to share our thoughts with you.

Grant Goolsby

Assistant Principal

874 Sam T Barkley Dr, New Albany, MS 38652

ggoolsby@nasd.ms

From: Lori Price <lori.price@lbsdk12.com>

Sent: Monday, April 11, 2022 2:26 PM

To: accreditation@mde12.org; Alan Burrow <ABurrow@mdek12.org>

Subject: APA Comments for Proposed Changes to Accountability Standards

To Whom It May Concern:

I am writing to express my grave concern regarding the use of banked scores to calculate ratings for the 2021-22 school year. As you know, last school year was a trying year, to say the least, due to the global pandemic. Accountability ratings were waived due to the inconsistency in the educational environments of the schools. I appreciate the grace that was given to us during this unprecedented time.

I am asking that this same grace be granted with the banked scores. Using any scores from the 2020-21 school year to calculate the rating for the 2021-22 school year would be, in my opinion, a skewed view of the data from this school year. MDE has already stated that the scores from the previous year were to obtain data to provide information on the impact of COVID-19. The Long Beach School District has worked diligently to use this information for that very purpose and to overcome the learning loss evident in this data. To use this information for any other reason would be misleading and create an additional hurdle for our teachers and students to overcome in an already challenging time.

I plead that you consider using legacy data rather than skip year growth for the growth component. I feel that this will allow for accountability to be provided to our teachers and students with fairness and equitability. Thank you in advance for your consideration.

Respectfully,
Lori Price

--
Assistant Superintendent
Long Beach School District
19148 Commission Road
Long Beach, MS 39560
Phone-(228)864-1146
Fax- (228)206-3961

"The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution or use of the contents of this message is strictly prohibited. If you received this electronic message in error, please notify us immediately at (228-864-1146)."

"The foregoing electronic message and any files transmitted with it are confidential and are intended only for the use of the intended recipient named above. This communication may contain material protected by the Family Educational Rights and Privacy Act (FERPA). If you are not the intended recipient, copying, distribution or use of the contents of this message is strictly prohibited. If you received this electronic message in error, please notify us immediately at (228-864-1146)."

OFFICE OF CHIEF ACCOUNTABILITY OFFICER
Summary of State Board of Education Agenda Items
April 21, 2022

OFFICE OF DISTRICT AND SCHOOL PERFORMANCE

- 01.B. Action: Approval of a temporary rule and to begin the Administrative Procedures Act (APA) process: To revise Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2021* specifically the business rules of the Mississippi Statewide Accountability System, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 11, *Comprehensive Support and Improvement Schools (CSI)*, Section 12, *Targeted Support and Improvement Schools (TSI)*, and Section 13, *Additional Targeted Support and Improvement Schools (ATSI)* [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]

Background Information: The MDE and the Technical Advisory Committee (TAC) determined that adjustments to accountability calculations are necessary for banked, high school End-of-Course (EOC) assessments for school year 2021-2022. In this case, the Academic Achievement indicator may be missing assessment scores from the 2019-2020 school year, either for use in growth, proficiency, or both measures. Also, changes are necessary for exit criteria for school improvement designations.

On March 17, 2022, the State Board of Education (SBE) granted approval to begin the APA process to revise the business rules of the Mississippi Statewide Accountability System to include the temporary proposed revisions for the 2021-2022 school year for banked, high school EOC assessments and school improvement designations.

The Commission on School Accreditation (CSA) met on April 12, 2022, and approved the MDE's recommendation to amend the business rules for the 2021-2022 school year for banked, high school EOC assessments as submitted to the State Board of Education on March 17, 2022, based on the public comments received. There were no recommended revisions to the initial proposal for the school improvement designation process.

The public comment period was open March 18, 2022, through 5:00 p.m., April 11, 2022. The MDE received 34 public comments. The MDE's proposal and the CSA's approval to amend the initial recommendation submitted to the SBE on March 17, 2022, is substantial and will require the MDE to begin a new Administrative Procedures Act process to solicit public comments.

The temporary rule and final action are necessary to implement the policy revisions immediately upon its filing with the Secretary of State in accordance with Miss. Code Ann. § 25-43-3.113(2)(b)(ii). See *also* Miss. Code Ann. § 25-43-3.108. For a rule to become effective immediately upon its filing, the Board is required to make a finding that the rule only confers a benefit or removes a restriction on the public or some segment thereof.

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

Title 7: Education

Part 24: MS Public School Accountability Standards, 2021

MISSISSIPPI

PUBLIC SCHOOL ACCOUNTABILITY STANDARDS

2021



**MISSISSIPPI
PUBLIC SCHOOL
ACCOUNTABILITY STANDARDS**

2021

MISSISSIPPI DEPARTMENT OF EDUCATION

OFFICE OF THE CHIEF ACCOUNTABILITY

OFFICE OF ACCREDITATION

Mississippi Statewide Accountability System: Business Rules

1. *Assignment of Performance Classifications*

- 1.1 Standards for student, school, and school district performance will be increased when student proficiency is at a 75% and/or when 65% of schools and/or districts are earning a grade of “B” or higher, in order to raise the standard on performance after targets are met. See Miss. Code Ann. § 37-17-6.

1.1.1 When performance classification cut-points are established, the following percentiles shall apply:

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

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

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

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

		A	≥	754
648	≤	B	<	754
584	≤	C	<	648
510	≤	D	<	584
		F	<	510

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

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

- 1.5 Assignment of district performance classifications shall be calculated by treating the district as one (1) large school based on the same performance classifications used for schools.
- 1.6 Cut-points for schools/districts shall be reviewed following the implementation of a new assessment.
- 1.7 Schools with grade configurations that include both 12th grade and grades below 9th grade shall have a performance classification assigned consistent with Section 1.3, but the composite score

shall be adjusted to account for the inclusion of performance measures for students below 9th grade. The following process shall apply:

1. Compute a composite score separately for students in grades below 9th grade and for students in 9th through 12th grades.
2. Transform the composite score for students in grades below 9th grade to the scale consistent with Section 1.3.
3. Weight each composite score by the percentage of students represented in the calculation and add the two (2) weighted scores together to obtain the adjusted composite score.
- 1.7.1 The adjustment provided for in this section shall not be applied in the calculation of cut-points for districts and schools.
- 1.7.2 The adjustment provided for in this section shall only apply in the assignment of the performance classification and shall not apply to federally-required school identification measures.

2. Full Academic Year (FAY)

- 2.1 In order for a student to meet Full Academic Year (FAY) and be included in the proficiency and growth calculations, he/she must have been enrolled (regardless of attendance) for at least 75% ($\geq 75\%$) of the days from September 1 (of school year) to the first day of testing. This date will be published yearly by the MDE and will be the same for all schools, students, and assessments. For schools on a traditional school calendar, the date will be in the spring.
Note: 74.5% will not be rounded up to 75%.
 - 2.1.1 Enrollment is defined as enrollment at the school/district level except for students in 4x4 block scheduled courses.
- 2.2 For students in 4x4 block scheduled courses, FAY for the Fall semester will be calculated from September 1 of the school year to the first day of Fall primary test administration. The specific date will be published yearly by MDE. FAY for the Spring semester will be calculated from February 1 to the first day of Spring testing, the same day as schools using a traditional school calendar. These dates will be published yearly by MDE.
- 2.3 The beginning and ending dates will be included in the calculation of FAY. Calculations will be based on calendar days, not instructional days. Weekends and holidays will be included in the calculations.
- 2.4 If a student meets FAY at a school other than the school where he/she is enrolled at the time of testing, his/her scores will count at the school where he/she met FAY.
- 2.5 This definition of FAY will not be applied to students for previous years where a previous definition of FAY was applied. If no FAY was calculated for a student in a previous year, this method will be applied.
- 2.6 FAY will be calculated at the school level as well as at the district level. Therefore, it is possible for a student who transfers within a district to meet FAY for a district and be included in the calculations for the performance classification for the district but not be included in the calculations for a school. Scores of all students will be included in the state level calculations regardless of FAY status.
- 2.7 If a student enrolls and withdraws in the same or different school on the same day, the student will be considered as having been enrolled for one (1) day in the receiving school.
- 2.8 (Deleted) Rule 2.9 supersedes.
- 2.9 If FAY cannot be calculated or discerned because of incorrect MSIS coding, the student will be forced to meet FAY at the school/district if the movement of the student appears to be within the same school/district.
- 2.10 If a student drops out of school and re-enrolls within the same school year, the re-entry date of the student will be included as the next enrollment date for the student.
- 2.11 If a student has concurrent enrollment in more than one (1) school/district, the period of concurrent enrollment will be included in FAY calculations at both locations.

3. N-Count Minimums

- 3.1 School Totals
 - 3.1.1 In order for a school to earn a performance classification, the school must have a minimum

of ten (10) valid test scores in each of the required components. Schools that do not have the minimum of ten (10) valid test scores for each of the components will have data from prior years combined with the current year [up to three (3) years of data] in order to achieve the minimum N-count. See Sections 15, 22, and 24 for exceptions to this rule.

- 3.2 N-Count Minimums for the Lowest Performing Twenty-Five Percent Student Subgroup
 - 3.2.1 This subgroup must have a minimum of ten (10) valid test scores. If there are less than ten (<10) students in the Lowest Performing Twenty-Five Percent Student subgroup, the subgroup will consist of all students except for the students scoring at the highest achievement level. If this calculation still results in a number less than ten (<10), then all students will be included in the calculation of the Lowest Performing Twenty-Five Percent Student subgroup.
 - 3.2.2 At the grade-level, a minimum of four (4) students with valid scale scores are required to identify the Lowest Performing Twenty-Five Percent Students-subgroup. If a grade has less than four (<4) students with valid scale scores for the subject, there will be no students identified as being in the subgroup for that grade level for that subject.

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

4. Participation Rates

- 4.1 If a school/district does not meet an overall 95% participation rate, the school/district will automatically be dropped one (1) performance classification and will have 95% of its enrollment included in proficiency calculations, as required by federal regulation. Participation rates are not rounded.
- 4.2 Elementary schools with no assessments (K, 1, and 2) will not be assigned a participation rate. Therefore, these schools will not be impacted by the participation rate minimum requirements.
- 4.3 Students may be removed from the denominator of testing participation calculations if he/she meets the criteria set forth by the Office of Student Assessment as having a Significant Medical Emergency which made participation in the state testing impossible. For details regarding the definition of Significant Medical Emergency and the process of requesting a student be removed from the calculations, please contact the Office of Student Assessment.
- 4.4 High School participation rates will be calculated based on the Senior Snapshot. Data from all statewide end-of-course, subject area assessments will be used in the participation calculations.
 - 4.4.1 For the 2013-2014 school year, the Senior Snapshot process used for calculating participation rates in end-of-course, subject area assessments will remain consistent with previous years. Beginning with the 2014-2015 school year, U.S. History will be included in the participation rate calculations.
- 4.5 Students with significant cognitive disabilities (SCD) with no U.S. History assessment scores will be removed from the denominator for the participation rate calculation for U.S. History.
- 4.6 Beginning with the 2015-2016 academic year, the ACT assessment will be included in participation rate calculations. See Section 25.
- 4.7 If a student is expelled but is still enrolled in MSIS for the school/district during the testing window, he/she will be included in the denominator. If the student does not test, the student will count as “not tested.”

5. Proficiency

- 5.1 Proficiency will be determined by the percentage of students who achieve a performance/proficiency of Proficient and above. No additional credit will be given for students scoring in a performance/proficiency level above proficient (e.g., “Advanced”). No partial credit will be given for students scoring in any performance level below proficient.
 - 5.1.1 For proficiency components worth 50 points, the weighted percentage of students proficient will be multiplied times 0.5 to determine the points applied to the component.
 - 5.1.2 The science proficiency component for schools with a 12th grade will be based on all science assessments administered at that school. Therefore, for schools with a 12th grade

that also have a 5th and/or 8th grade, the science component for that school will still be worth 50 points.

- 5.2 Assessments included in the proficiency calculations will consist of all federally-required statewide assessments in Reading/Language Arts/English, Mathematics and Science, and any additional end-of-course, subject area assessments. This includes all Alternate Assessments based on Alternate Achievement Standards (AA-AAS) for SCD students. Note: This rule will need to be reviewed with the implementation of any new statewide assessments.

6. Growth

- 6.1 Growth is determined by whether or not a student increases in performance/proficiency levels from one (1) year to the next based on the following criteria:
- An increase of ANY performance/proficiency level
 - Staying at Proficient from one (1) year to the next
 - An increase within the lowest three (3) performance/proficiency levels that crosses over the mid-point of the level. Example: Bottom half of Basic to top half of Basic.

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

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

Note: Because additional weight is given, it is mathematically possible for a school or district's growth value to be greater than 100 points for any/all of the four (4) growth components.

- 6.3 Any decrease in performance/proficiency levels = 0.

- 6.4 The lowest three (3) performance/proficiency levels will be split into half at the mid-point of the range. If the range is an odd number and cannot be split into two (2) equal halves, the lower half of the performance/proficiency level will be one (1) point larger than the upper half. (Example: If the range of the performance/proficiency level is thirteen (13) scale score points, the bottom half of the range will be seven (7) scale score points and the upper half of the range will be six (6) scale score points.)

The splitting of the lowest three (3) performance/proficiency levels into half at the mid-point range is not intended to create three (3) new separate performance/proficiency levels. Therefore, students who move from the bottom half of the lowest performance/proficiency level to the bottom half of the second lowest performance/proficiency level will not be given additional weight for increasing two (2) performance/proficiency levels. That student will be considered to have increased one (1) performance/proficiency level.

Note: Rules regarding the splitting of the lowest three (3) performance/proficiency levels are subject to review and change with the implementation of any new assessments.

- 6.5 Assessments used for calculation of growth will include:
- Grade-level (3-8) assessments in English Language Arts;
 - Grade-level (3-8) assessments in Mathematics;
 - High School level assessments in English Language Arts;
 - High School level assessments in Mathematics;
 - Alternate Assessments (3-8 and High School) in English Language Arts; and
 - Alternate Assessments (3-8 and High School) in Mathematics.
- Note: Growth will not be calculated for Science or U.S. History.

- 6.6 Students taking Algebra I, in 7th or 8th grade, are required by federal regulation to also take the grade-level assessment in mathematics. Therefore, these students will have two (2) growth calculations: grade-level to grade-level and grade-level to Algebra I. The grade-level to grade-level

growth calculation will be applied to the current school. The grade-level to Algebra I growth calculation will be banked until the student's 10th grade year.

- 6.7 To calculate growth for the high schools for Math-All Students, Math-Lowest Performing Students, Reading-All Students and Reading-Lowest Performing Students, the 8th grade grade-level assessments will be used as the baseline. The exceptions to this are as follows:
- If a student takes Algebra I during his/her 8th grade year, his/her 7th grade grade-level assessments will be used as the baseline and banked until the student is in the 10th grade.
 - If a student takes Algebra I in the 7th grade, his/her 6th grade grade-level math assessment will be used as the baseline and banked until the student is in the 10th grade.
- 6.8 If a student does not have the previous year's grade-level assessment, the student will be excluded from the growth calculation(s) except in the cases of the end-of-course, subject area assessments.
- 6.9 For students taking end-of-course, subject area assessments in grades lower than 10th grade, growth will be banked until the student's 10th grade year and then applied.
- 6.10 If a student does not take the end-of-course, subject area assessments until 11th or 12th grade year, growth will be calculated and applied in the first year he/she has a valid score. The exception to this will be for students taking the alternate assessment. For students taking the alternate assessment, a cap of two (2) years will be applied to the growth calculations. Therefore, if a student takes the alternate assessment in 8th grade and does not take the high school level alternate assessment until 11th or 12th grade, he/she will not be included in the growth calculations.
- 6.11 Students who are retained in 3rd through 8th grades will have a growth calculation based on the retained grade from the previous year. (Example: A 4th grade student who was retained will have growth calculated based on his/her previous year's 4th grade assessment scores.)
- 6.12 For K-3 schools, growth of 4th grade students in the district will be used for the growth calculations of the K-3 school in which they met FAY. Growth of the 3rd grade students who are retained will be included with the 4th grade student growth calculations.
- 6.13 The student must meet FAY for the current year in order to be included in the growth calculations but is not required to meet FAY for the previous year.
- 6.14 Growth will not be calculated for students who take the Alternate Assessment in the current year but took the grade-level general education assessment the previous year or vice versa.
- 6.15 The denominator for the growth calculation includes any FAY student with two (2) valid assessment scores (as defined above). The numerator will include any student included in the denominator who has demonstrated growth as defined above and weighted accordingly.

7. *Lowest Performing Students*

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

Note: The Lowest Performing Twenty-Five Percent Student subgroup will be determined by identifying the percentage of students, as defined by Miss. Code Ann. § 37-17-6, who are the lowest performing students in a given subject area.

The process:

1. Beginning with the 2014-2015 school year, the scores of all students participating in the general education and alternate assessments will be standardized by subject area, grade level, assessment type, and school year.
2. Sort the standardized scores of all FAY students in a grade from highest to lowest

based on their prior year standardized scores. Students without an eligible score from the previous year are not included. See Section 6 and Rule 7.1.3 for additional clarification.

3. Divide the number of students in the list by four (4). If the result is not a whole number, then automatically round up to meet the 25% minimum.
4. Count, from the lowest score up, the number of students identified in step 3. Then identify the standardized score that corresponds to that student. This standardized score becomes the boundary score.
5. Identify all students with the boundary score determined in step 4. All students with the same boundary score or lower standardized score will be included in the Lowest Performing Twenty-Five Percent Student subgroup for that subject/grade.
6. Repeat the process for each grade for the subject then combine students to form the Lowest Performing Twenty-Five Percent Student subgroup for the school for the subject.

Note: The number of students in the Lowest Performing Twenty-Five Percent Student subgroup must meet the minimum N-count as defined in Section 3.2. If the minimum N-count is not met, the rules outlined in Section 3.2 will be applied. See Section 3.

It is possible for the Lowest Performing Twenty-Five Percent Student subgroup to be more than 25% when steps 5 and 6 are applied.

7.1.2 Deleted

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

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

8. Graduation Rate

- 8.1 The federally-approved four-year graduation rate will be used. Miss. Code Ann. § 37-17-6 Definition: The number of students who graduate in four (4) years from a school and LEA with a regular high school diploma or state-defined alternate diploma divided by the number of students who entered four (4) years earlier as first-time 9th graders, with adjustments for deaths, emigration, and transfers in and out. Ninth (9th) grade students who repeat 9th grade will stay in their original cohort.

Definition: A "regular high school diploma" is the standard high school diploma that is fully aligned with the state's academic content standards.

- 8.2 Ungraded students will be assigned to their peer-age cohort, based on the year in which the student obtains the age of 14 prior to September 1.
- 8.3 The schools/district graduation rate will be multiplied by 2.0 to calculate the points applied to the graduation component for schools/districts.
- 8.4 In the calculation of graduation rates, students are assigned to the school and district of longest enrollment during the federally-defined, four-year adjusted cohort window. In the event a student has equal enrollment in one (1) or more schools or districts, the student will be assigned to the school and district of final enrollment.
- 8.5 The school/district graduation rate applied in the graduation component is lagged one (1) year.

9. Acceleration

- 9.1 Beginning in school year 2015-2016, high schools will have an Acceleration component in their calculations.
- 9.2 The Acceleration component refers to the percentage of students taking and passing the assessment associated with accelerated courses which include Advanced Placement (AP), International Baccalaureate (IB), Advanced International Certificate of Education (AICE), dual credit or SBE-approved industry certification courses. For students taking dual credit courses, passing refers to students who are passing the course with an unweighted "C" or above. For AP courses, the student must score at least three (3) on the AP exam. For IB courses, the student must score at least four (4) on the IB exam. For AICE courses, the student must obtain a passing score on the exam. (Passing scores of "A", "B", "C", "D", and "E" on the AICE exams are not based on the American "A-F" grading scale.) For industry certification courses, the student must pass the exam.
 - 9.2.1 Dual credit courses must be credit-bearing courses with a minimum of three (3) semester hours credit, and beginning in school year 2019 - 2020, shall be limited to the list of articulated courses found in Appendix V of the current *Procedures Manual for the State of Mississippi Dual Enrollment and Accelerated Programs* document. Refer to the current edition of the *Approved Courses for Secondary Education* for approved Career and Technical Education (CTE) courses.
 - 9.2.2 Beginning in school year 2020 – 2021, schools must enter non-weighted course grades for dual credit courses in MSIS. These non-weighted grades will be used in the performance measure for dual credit courses.
- 9.3 The Acceleration component will consist of a Participation and a Performance component. These two (2) components will be combined for one (1) score worth fifty (50) points and phased in on the following sliding scale:
 - a. Year 1 (2015-2016): (Participation-70%/Performance-30%) ÷ 2
 - b. Year 2 (2016-2017): (Participation-60%/Performance-40%) ÷ 2
 - c. Year 3 (2017-2018) and beyond: (Participation-50%/Performance-50%) ÷ 2
- 9.4 Calculation of Participation
 - 9.4.1 The numerator for the Participation component calculation will be the number of students taking accelerated courses and/or related exams as defined in Section 9.2.
 - 9.4.2 The denominator for the Participation component calculation shall include all students whose Mississippi Student Information System (MSIS) grade or peer-grade equivalent is 11th or 12th grade plus any 9th or 10th grade students who are taking and passing these assessments/courses. Ninth (9th) and 10th grade students will not be included in the denominator unless they are also included in the numerator.)
 - 9.4.3 Students participating in multiple accelerated courses during the same school year will be given additional weighting in the numerator as follows:
 - 2 courses: 1.1
 - 3 courses: 1.2
 - 4 courses: 1.3
 - 5 courses: 1.4
- 9.5 Calculation of Performance
 - 9.5.1 The numerator for the Performance component calculation will be the number of students taking and passing accelerated assessments/courses such as AP, IB, AICE, dual credit, dual enrollment, or industry certification courses based on the definition above.
 - 9.5.2 The denominator for the Performance component calculation will consist of all students participating in the courses and/or tests identified in the participation calculations.
 - 9.5.3 Students who are enrolled in accelerated courses but do not take the required assessment will be considered as "not proficient" in the performance calculations.
- 9.6 For students taking and passing multiple dual credit courses, the additional weighting used in the participation calculations will be applied.
- 9.7 In the calculation of participation, students who take an accelerated course during their 11th grade year but do not take an accelerated course during their 12th grade year will be counted in the denominator both years, but in the numerator during their 11th grade year only.

- 9.8 FAY requirements will not be applied to the participation or proficiency calculations in the Acceleration component.
- 9.9 For students taking and passing accelerated courses in AP, IB, AICE, or industry certification that have a normed, end-of-course assessment, the numerator will be doubled in weight.
- 9.10 For students in 9th through 12th grade that participate in accelerated courses as described in Section 9.2 that are designed with a two (2) year curriculum and do not have an associated assessment in the first year, the student will be included in participation calculations but will be excluded from performance measures in the first year and will be included in both participation and performance measures in year two (2).

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

- 10.1 Scores of students taking Algebra I, Biology, English II, or U.S. History end-of-course, subject area tests assessments in a grade below 10th grade will be “banked” for proficiency/achievement and growth calculations until the student is in the 10th grade and then applied to the student’s 10th grade school (if the student met FAY requirements the year he/she was assessed and during his/her 10th grade year). See Section 6 for additional clarification on Growth.
- 10.2 If a student transfers out of the district before or during their 10th grade year, his/her scores (achievement and growth) will not be applied to the school of origin or receiving school in the new district. Note: See Section 4 (Participation) and 6 (Growth) for additional information.
- 10.3 If a student matriculates from the 9th grade to the 11th grade without enrolling in the 10th grade, banked scores will be included in accountability measures when the student is enrolled in the 11th grade.

Changes approved by SBE for APA on March 17, 2022:

~~Note: For students with end-of-course assessments included in accountability calculations during the 2021-2022 school year that do not have a prior-year score due to the suspension of assessments during the 2019-2020 school year, growth will be measured using the 2018-2019 school year as the baseline year.~~

~~Eighth grade students enrolled in Algebra I that would have taken and banked assessments in the 2019-2020 school year but did not assess due to the suspension of assessments will have their proficiency and growth scores in math from the 2018-2019 school year included in accountability math measures in the 2021-2022 school year.~~

New proposal approved by the CSA on April 12, 2202:

Note: For the 2021-2022 school year only, accountability measures in proficiency and growth will not include banked scores from prior years but will include all high school, end-of-course, subject area assessments taken during the 2021-2022 school year, regardless of grade level. For any schools with end-of-course assessments that do not contain 12th grade, scores will be assigned to the high school that the current school feeds to. Scores will also be banked in accordance with Rule 10.1 for use in future school years; therefore, some students’ scores will be included in accountability measures twice.

For 10th grade students taking end-of-course assessments included in accountability calculations during the 2021-2022 school year that do not have a prior-year score due to the suspension of assessments during the 2019-2020 school year, growth will be measured using the 2018-2019 school year as the baseline year.

11. Comprehensive Support and Improvement Schools (CSI)

- 11.1 Title IA High Schools with a graduation rate less than or equal to 67 percent shall be identified as a Comprehensive Support and Improvement school. This identification will occur on a three (3) year cycle.

Note: For the 2022 -2023 Academic School Year Only, the identification cycle is reduced to one (1) year.

11.2 Title IA schools with a composite accountability score in the bottom five (5) percent of overall accountability index will be identified as a Comprehensive Support and Improvement school. This identification will occur on a three (3) year cycle.

Note: For the 2022 -2023 school year, the identification cycle is reduced to one (1) year.

11.3 Beginning with the ~~2021-2022~~ 2022-2023 academic year, a school previously identified as an Additional Targeted Support and Improvement school with three (3) consecutive years of subgroup ~~proficiency performance score~~ in ELA or math at or below that of all students in the bottom five (5) percent of Title IA schools shall be identified as a Comprehensive Support and Improvement school. This identification will occur annually.

Note: Performance data from the 2019-2020 and 2020-2021 school years will not be used in the identification described in Section 11.3.

For the 2022 -2023 school year, the identification cycle is reduced to one (1) year.

12. Targeted Support and Improvement Schools (TSI)

12.1 A school with a subgroup composite score that is in the lowest 50 percent and in the lowest quartile of the three (3) year average gap-to-goal, and in the lowest quartile of the three (3) year improvement toward gap-to-goal closure shall be identified as a Targeted Support and Improvement school.

Note: Performance data from the 2019-2020 and 2020-2021 school years will not be used in the three (3) year average.

12.2 Schools meeting the requirements in Section 12.1 will be rank-ordered annually, using the composite accountability score, and the bottom five (5) percent of all schools not identified for Comprehensive Support and Improvement will be identified as a Targeted Support and Improvement school.

13. Additional Targeted Support and Improvement Schools (ATSI)

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

Note: Performance data from the 2019-2020 and 2020-2021 school years will not be used in the three (3) year average.

14. Deleted

15. English Learners (EL)

15.1 The scores of English learners who have attended a U.S. school for less than 12 months will only be included in participation calculations in the first (1st) year. In the second (2nd) year, growth will be included, and in the third (3rd) year, growth and proficiency will be included in accountability measures.

15.1.1 Local Education Agencies (LEA) shall identify English learner students, who have attended a U.S. school for less than 12 months, to be designated for exclusion on or before February 1, annually. Note: For more information, contact the Office of Federal Programs.

15.2 An EL performance component will be calculated for each school and district beginning with the 2017 - 2018 school year and will be included in the calculation of accountability grades beginning in the 2018 - 2019 school year. The EL performance component will be equal to the average EL progress rate of students as defined in Section 15.4, multiplied by the total points assigned to the EL component for that school/district.

15.2.1 Each school or district must meet the minimum N-count for EL students in order to have an EL performance measure calculated.

15.2.2 The performance measure will be equal to 5% of total available points in the accountability system. All other components will be reduced by a total of 5% when the

- EL performance measure is included.
- 15.2.3 The component score for districts and schools will be adjusted such that an average student rate of 0.9 or higher shall receive the maximum score for this component. This adjustment will be applied uniformly to all other averages below 0.9, effectively increasing each value by 10 percent.
- 15.3 Progress toward proficiency will be calculated for all EL students using the state English Language Proficiency Test (ELPT). An annual progress goal will be calculated for each student based on reaching proficiency on the ELPT within five (5) years of entry into an EL program. The annual progress goal will be equal to the minimum score needed to achieve proficiency at year five (5), minus the prior year score, divided by the number of years the student had remaining to exit the EL program in the prior year.
 - 15.3.1 In year five (5) and beyond, the annual progress goal is equal to the minimum score needed to achieve proficiency, minus the prior year score.
- 15.4 EL performance will be measured by the annual progress achieved by EL students. Each student will have a rate ranging between zero (0) and one (1) based on the student's current year ELPT score, minus the prior year score, divided by the annual progress goal as defined in 15.3. Any student who does not demonstrate progress will have a rate of zero (0). No student will receive a rate higher than one (1).
 - 15.4.1 The student must meet FAY requirements in the current year but is not required to meet FAY requirements in the prior year.
 - 15.4.2 The student must have a prior year score to be included in the calculation.

16. *Students with Disabilities*

- 16.1 United States Department of Education (USDE) regulations limit the number of scores of children taking alternate assessments for SCD students scoring proficient or above to one percent (1%) of the students at the state and district level. This rule does not apply at the school level because these regulations recognize that some schools offer specialized services or are near specialized medical facilities that attract higher numbers of students with significant special needs. Therefore, if a district has greater than one percent (1%) of their total population scoring proficient or above on an alternate assessment, the percent above one percent (1%) will count as not proficient in accountability calculations.
- 16.2 All eligible SCD students will be expected to participate in statewide assessments per the schedule provided by the Office of Student Assessment. Note: This rule will need to be updated and revised with the implementation of any new alternate assessment.
- 16.3 Non-SCD students are not allowed to participate in alternate assessments. If any such students have alternate assessment data, the test data shall be considered invalid.
- 16.4 Students with disabilities will be those students whose SPED indicator in MSIS is "Y" (Yes) at the end of month eight (8) (closest approximation to the test administration dates).
 - 16.4.1 In order for a student to be counted as SCD, his/her SCD indicator and SPED indicator must be set to "Y" (Yes) in MSIS.
- 16.5 Students with disabilities who are coded as "ungraded" (56 or 58) in MSIS will be assigned a peer-grade calculation based on his/her age on September 1 of the current school year.

17. *Duplicate Test Scores*

- 17.1 If a student takes the general education (grade-level) assessment AND the alternate assessment, the scores from the general education assessment will be used in the school/district accountability calculations.
- 17.2 If MSIS records indicate two (2) valid assessment scores for the same assessment in the same year, the score from the first administration date will be used. If MSIS records indicate two (2) valid assessment scores for the same assessment on the same date, the higher of the two (2) scores will be used in the school/district accountability calculations.

18. *Invalid Test Scores*

- 18.1 Students with invalid test scores will be counted as “not tested” for participation calculations.
- 18.1.1 Following an invalidated score, when a student retests, the first valid test score will be used in the proficiency, growth, and participation calculations.
- 18.2 If an invalid score is validated after the accountability calculations are performed and final school/district performance classifications have been assigned, the school/district’s performance classifications will not be recalculated and adjusted to reflect the validated score. If during the next year, the student tests again and has a valid test score, that test score, although it was not the student’s first test score, will be used during the next year’s calculations. Please refer to the Office of Student Assessment regarding deadlines for appealing invalid test scores.
- 18.3 For students in 3rd grade through eighth 8th grade, if a student’s MSIS grade level (or peer grade level for ungraded students) does not match his/her assessment grade level, the student’s scores will not be included in the numerator for participation, growth, or proficiency calculations, and the student will count as not proficient, not meeting growth, and not tested. Likewise, the student’s scores will not be used the following year in growth calculations.
- Note: This rule does not apply to end-of-course, subject area assessments or high school alternate assessments.

19. Rounding

- 19.1 In the calculation of each of the components in the statewide accountability system that are reported to schools, the final value of each component will be rounded to one (1) decimal place (tenths place). After the components are summed, the total value will be rounded to a whole number and reported for the final performance classification calculation.

Example:

Reading Proficiency	80.5
Reading Growth – All Students	80.5
Reading Growth – Lowest Performing Students	80.5
Math Proficiency	80.5
Math Growth – All Students	80.5
Math Growth – Lowest Performing Students	80.5
Science Proficiency	80.5
Total Score	564

Note: Other rounding rules are embedded in the explanations of the specific components.

20. School Reconfigurations or Redrawing of District Lines

- 20.1 A school’s accountability calculations will be based on the grade configuration of the school (and the students in that school) on the date that corresponds with the FAY at the time of testing. See Section 2 for details on FAY. The calculations are applied to the school the following year, regardless of any reconfigurations or redistricting that takes place during the summer after testing or during the school year before testing.
- 20.2 Consolidated districts/schools who maintain the same grade configuration and/or student population as existing in the previous school district will receive the eligible scores or statuses of students who previously attended the school in the previous school district.

21. Alternative, Career, Technical, and Child Development Centers

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

development centers.

22. Schools without Tested Subjects or Grades

22.1 Elementary/Middle Schools

22.1.1 Any elementary/middle school that does not have reading or math scores because the school does not have the required grade level, the scores from the students in the next higher grade in the tested subject within the same district will be applied back to the student's lower elementary school of origin. In order for the scores to be applied, the student must meet FAY at the lower grade school, the current school and if there is a gap in years, anywhere in the district for the years in between.

Example 1, Pre-K through 2nd grade School:

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

Example 2, Pre-K through 3rd Grade:

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

Example 3, Pre-K through 4th Grade:

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

Students for Pre-K through 3rd grade.

- All applicable FAY rules will apply.

Example 4, 6th and 7th grade:

- Reading and Math Proficiency - The reading and math scores from students in 6th and 7th grade at the school will be used to calculate the math and reading proficiency for that school.
- Science Proficiency - An equating process will be used to adjust the scores for this component.
- Growth - The reading and math scores from students in 6th and 7th grade at the school will be used to calculate the growth for Reading-All Students, Math-All Students, Reading-Lowest Performing Students, and Math-Lowest Performing Students for 6th and 7th grade.
- All applicable FAY rules will apply.

22.1.2 An equating process to adjust the points required will be used for elementary/middle schools that do not have science scores because the school does not have a 5th or 8th grade.

22.1.3 Beginning with the 2014-2015 and ending with the 2017-2018 school year, the cut-points established for elementary/middle schools that do not have science scores will remain static in succeeding years. In subsequent years, the cut-points shall be reviewed following the administration of a new assessment.

22.2 High Schools

22.2.1 Schools with missing data for components specific to high schools will have available proxy data applied in the following order of availability; three (3) year historical school average, two (2) year historical school average, prior year school score, current year district score, prior year district score. If no proxy data is available, an equating process will be used to adjust for the missing components.

22.3 Schools with only Pre-Kindergarten and/or Kindergarten will be assigned the school performance classification of the next level school to which that school feeds. If the school feeds to multiple schools, the performance classification will be assigned from a weighted average of the composite scores of the schools to which it feeds.

23. State and Other Special Schools

23.1 Mississippi School of the Arts (MSA) and Mississippi School for Math and Science (MSMS)

23.1.1 The Mississippi School of the Arts and Mississippi School for Math and Science will not be assigned performance classifications but will have performance on available indicators reported consistent with other schools/districts.

23.1.2 If a student takes an end-of-course, subject area assessment for the first time while at MSA or MSMS, his/her scores will be sent back to their school/district of origin and rolled into the state totals.

23.1.3 Students enrolled at MSA and/or MSMS during the time of the Senior Snapshot will have their ACT scores sent to their high school of origin.

23.1.4 For students enrolled at MSMS or MSA, the school/district of origin is defined as the school/district where the student was enrolled and met FAY requirements in the school year immediately prior to enrollment at MSMS or MSA.

23.2 Mississippi School for the Blind (MSB) and the Mississippi School for the Deaf (MSD)

23.2.1 The MSB and MSD will not be assigned performance classifications but will have performance on available indicators reported consistent with other schools/districts.

23.2.2 Students enrolled in the MSB and MSD will have performance measures included in the performance classification of the school/district of residence.

23.3 Other State/Special Schools

23.3.1 State agencies (i.e., Hudspeth, Ellisville State School, etc.) will not be assigned performance

- classifications.
- 23.3.2 Students placed in non-public schools (special private schools; i.e., Millcreek, CARES, etc.) but are enrolled in regular Mississippi public schools will have their performance measures included in the calculations of the school/district in which he/she is enrolled in MSIS.
 - 23.3.3 Students enrolled in special/non-public schools with codes 200 and 500 have no enrollment and are not used for any of the usual statistical and reporting purposes. If a student is enrolled in a public school during the testing window, he/she would have to be tested (and counted in the testing participation rates) and his/her score (if FAY) would be used for accountability purposes.
 - 23.3.4 University-based schools will not receive performance classifications.
 - 23.4 Students in Correctional Facilities/Juvenile Justice System
 - 23.4.1 According to the USDE, these facilities are considered “programs” not schools and would not be assigned performance classifications.
 - 23.4.2 If a student, who is still enrolled in MSIS, is in such a program and is not tested, the student will count as “not tested” in the participation rate calculations of the school/district. If the student is tested, his/her scores will count at his/her MSIS resident school.
 - 23.5 Virtual Public Schools
 - 23.5.1 Only schools classified under the USDE’s Education Data Exchange Network (EDEN) reporting requirements as a separate school entity will receive a performance classification.
 - 23.6 Early College High Schools
 - 23.6.1 Students enrolled in an Early College High School will have their performance measures included in the performance classification of the school/district of residence.
 - 23.6.2 Early College High Schools will not be assigned performance classifications but will have performance on available indicators reported consistent with other high schools.

24. 9th Grade Only Schools

- 24.1 Scores of a 9th grade only school will be combined with the high school to which that school feeds and calculated as one (1) school but reported as two (2) separate schools. In other words, both schools will earn the same performance classification because it will be based on the same data calculations.

25. College- and Career-Readiness Indicator

The following rules will apply only if the state legislature mandates statewide ACT testing and appropriate 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. A student who achieves a Gold or Platinum level National Career Readiness Certificate administered through the ACT WorkKeys does not have to meet the additional requirement of successful completion of an industry certification or career pathway.
- 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.

26. *Senior Snapshot*

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

27. *Other*

- 27.1 Deceased Students
 - 27.1.1 Students indicated in MSIS as deceased will not be included in any accountability calculations.
- 27.2 Foreign Exchange Students
 - 27.2.1 Beginning in school year 2013-2014, foreign exchange students will automatically be included in accountability calculations just as any other students. However, if a school/district wishes to have a foreign exchange student excluded from the accountability calculations, the request should be made through the Internal Review Process.
 - 27.2.2 Deleted