

**OFFICE OF CHIEF ACCOUNTABILITY OFFICER**  
**Summary of State Board of Education Agenda Items**  
**January 21, 2021**

**OFFICE OF DISTRICT AND SCHOOL PERFORMANCE**

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

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

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

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

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

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

Recommendation: Approval

Back-up material attached

**Summary of Administrative Procedures Act (APA) Comments**

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

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

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

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

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

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	indeed in a career-readiness pathway and graduates prepared for a career.
<p>I am a parent and an educator. I strongly support the Silver level score WorkKeys certification for an accountability model; however, I do not feel that it should be a standalone benchmark for success. I feel it would be discriminatory to require students in the career pathway to pass multiple tests, while the ACT is the only benchmark for academic success. I only one is necessary for academics, one should be adequate for the career pathway.</p>	<p>The MDE agrees that the ACT WorkKeys should not be a stand-alone measure of student success in the CCR component.</p>
<p>I hope this finds you well. My spouse, Amanda, and I (Jon) are writing to make a comment on the change being proposed to the Statewide Accountability Model. We agree with the stance of the Parents' Campaign, which is:</p> <p>"The Parents' Campaign supports the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model."</p> <p>As you are likely familiar, Ms. Loomer has written a letter that expresses a view we both also agree with. Here is a link to her letter: <a href="https://msparentscampaign.org/wp-content/uploads/2021/01/TPC-Public-Comments_WorkKeys-Addition-to-Acct-Model.pdf">https://msparentscampaign.org/wp-content/uploads/2021/01/TPC-Public-Comments_WorkKeys-Addition-to-Acct-Model.pdf</a>.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>While I strongly support the addition of WorkKeys to the CCR component, I have to oppose the Mississippi Department of Education's</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success</p>

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<p>(MDE's) modification of the Accountability Task Force recommendation for measuring student success on the WorkKeys assessment.</p> <p>The Task Force recommended using the national industry standard Silver level score on the WorkKeys assessment as a stand-alone benchmark of success, just as the ACT national standard is being used as a stand-alone benchmark of success for college prep students. MDE has recommended that career track students be required to meet both the national industry standard Silver level score <i>and</i> an additional industry certification or career pathway in order to be counted as successful in the accountability model. Students on a college prep track are not required to have an additional certification, only the ACT benchmark score.</p> <p>I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p>	<p>in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>Please accept the Parent's Campaign recommendations. This will ensure all students are counted.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of</p>

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



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<p>national standard is being used as a stand alone benchmark of success for college prep students.</p>	<p>measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>"The Parents' Campaign supports the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model."</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in</p>

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	<p>the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I support the addition of WorkKeys to the CCR component, but I oppose the MDE’s modification of the Accountability Task Force recommendation for student success on the WorkKeys assessment. The Task Force recommended using the national industry standard Silver level score on the WorkKeys assessment as a stand-alone benchmark of success, just as the ACT national standard is being used as a stand-alone benchmark of success for college prep students. MDE has recommended that career track students be required to meet both the national industry standard Silver level score and an additional industry certification or career pathway in order to be counted as successful in the accountability model. Students on a college prep track are not required to have an additional certification, only the ACT benchmark score. I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am writing to express my concern about adding the WorkKeys career-readiness Indicator in addition to national certification exams already required for some second year CTE completers. I firmly support making the WorkKeys the SOLE indicator for accountability. The state of Mississippi has long over-tested our students and the addition of another test will, in my opinion, be counterproductive. The Perkins Act already holds my CTE programs accountable for our second-year completers</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has</p>

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<p>scoring PROFICIENT on the Algebra 1, English 2, and Biology 1 state tests. Students are only required to PASS those tests to graduate. I realize the state of Mississippi cannot change this, but it is grossly unfair. Until those academic programs start teaching CTE curricula in their academic classroom, I will never understand this requirement.</p>	<p>shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I currently serve as the CTE Director for Pontotoc County School District. I am in my fourth year as director and 17th year in CTE altogether. I started WorkKeys testing at my center four years ago and have seen tremendous success. Many industries require silver or higher to be employed. I feel that we need to push for silver level or higher be included in accountability ratings. The industries that we work with, do not look at state tests for hiring purposes. If we are truly in this job to help students, then we will focus on WorkKeys and ACT.</p>	<p>In support of change</p>
<p>I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would</p>

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	<p>lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am sending this email to let you know that I am in favor of the ACT Workkeys Silver being the lone indicator of CTE success. Please consider this request. Thank you!</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>

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

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	achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.
I am in favor of making ACT Workkeys Silver the lone indicator of CT success!	If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.
I am in favor of making ACT Workkeys Silver the lone indicator of CT success!	If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or

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	<p>Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>As a former public-school teacher, college dean and workforce training education the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p>	<p>(Note: The MDE is unsure of the commenter’s position. The comment was copied as written and appears to be incomplete.)</p>
<p>I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two-year CTE program with a grade of “C” or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve this opportunity.</p>	<p>In support</p>
<p>I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two-year CTE program with a grade of “C” or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve no less.</p>	<p>In support of change</p>
<p>We agree with adding ACT WorkKeys to the model but disagree with the additional qualifiers of industry certification and/or two year program completion which the Mississippi Department of Education is recommending for an ACT WorkKeys score to be included in the CCR component of Mississippi’s Accountability Model. We urge you to adopt</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing</p>

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Summary of Comment	MDE Response
<p>the recommendation of the Accountability Task Force which does not add the qualifiers of industry certification and/or two year program completion to the ACT WorkKeys score in order to be included in the CCR component of the accountability model. In order to serve all students and to include all students in the accountability model, we must shift from the mindset of "everyone has to go to college" to supporting that there are multiple options for all students</p>	<p>measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two-year CTE program with a grade of "C" or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve no less.</p>	<p>In support of change</p>
<p>Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them or are not counted in the Acceleration component of the Accountability Model. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, we do not believe national certifications should also be required along with the ACT WorkKeys. I would like to recommend adding the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.</p>	<p>The MDE agrees that a Silver NCRC and the completion of a career pathway or completion of an industry certification should be an indicator of success; however, it should not be considered a higher level of success than meeting ACT benchmarks in English or Reading and Math.</p>



**Summary of Administrative Procedures Act (APA) Comments**

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

Summary of Comment	MDE Response
<p>I would also like to request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program. For example, A Silver Level or above on the WorkKeys certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.</p>	
<p>#1 The Accountability Task Force recommended the silver score stand alone as a measure of career readiness on the Workkeys test. The task force did not recommend attaching any other items to the aforementioned score. While an industry certification is certainly a goal for students, not all paths have a certification that can be reached while in high school. Along these same lines, we may have students that choose an academic path that does not allow for CTE classes. Using Workkeys universally would allow both students and schools some flexibility with their choices.</p> <p>#2 The current proposed change could potentially cause an equity issue with many school districts. Access to CTE programs from district to district can vary widely. The Workkeys test itself is universal.</p> <p>#3 The sentence included in the press release states, “The Commission on School Accreditation on Dec. 10 approved unanimously a proposal from the Mississippi Department of Education to require a WorkKeys Silver level student performance and completion of an industry certification or pathway to ensure <b>comparable rigor</b> between ACT and ACT WorkKeys in the accountability model.”</p> <p>The inference here is Workkeys is not comparable with regard to rigor to the ACT. While I somewhat agree with that statement, I disagree with the way comparability is being <b>applied</b> in this particular case. The ACT is measuring college readiness, while Workkeys measures career readiness. We are comparing apples to oranges when attempting to parallel the “rigor” of both of these tests in this case. While making the argument that Workkeys is not as rigorous as the ACT academically, one could make a similar argument in reverse. Workkeys measures the likelihood of success in business in industry based on both hard and soft skills. The ACT is not huilt to measure these items. Ultimately, rigor</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p> <p>The MDE also agrees that the ACT and the ACT Workkeys measure different attributes, making a direct</p>

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Summary of Comment	MDE Response
<p>comparisons are null and void when the desired testing outcomes are divergent.</p> <p>If our ultimate goal is to either send students into the work force or to the college of his or her choosing, both tests should hold equal weight without any other attachments and/or requirements.</p>	<p>comparison difficult. This is one reason why the agency recommends additional considerations for student success other than just the Silver NCRC.</p>
<p>The Pearl River County School District disagrees with MDE's recommendation that requires a student meet the Silver benchmark on WorkKeys and successfully complete an industry certification or career pathway in order to be included in the CCR component. Instead, we agree with the recommendation from the Accountability Task Force to allow a score at the Silver benchmark or higher on WorkKeys assessment to be considered successful as a standalone metric and be included in the numerator for mathematics and/or English/reading components of the CCR in lieu of the ACT college prep benchmark requirement for the purposes the state accountability model.</p> <p>MDE's recommendation requires career track students meet more requirements than college prep students. In order for the CCR component of the accountability model to truly assess career readiness, a career readiness indicator must be used. WorkKeys is an effective indicator of career readiness; however, career track students should not have to meet both the college prep benchmark and the career readiness benchmark. Students should be able meet career readiness benchmark without being required to meet the college prep benchmark. MDE's suggestion that career skills are inferior to college prep skills is unfair and damaging to our students and our education system in Mississippi.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am in full agreement with the attached letter submitted by Mrs. Kelly. Please consider giving CTE education some representation on our State accountability model.</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>

**Summary of Administrative Procedures Act (APA) Comments**

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

Summary of Comment	MDE Response
<p>The MASCTA Board of Directors strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. We believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>I am writing this letter to show support for the recommendation of adding the ACT WorkKeys assessment along with completing a career pathway or acquiring an industry certification to the Mississippi Statewide Accountability System.</p>	<p>In support</p>
<p>I strongly believe that WorkKeys Silver, along with a successful completion of a two-year CTE program, would be a strong indicator of student success for career readiness in the accountability model.</p>	<p>In support</p>
<p>I feel that it is better for the students and workforce that the students must make silver on the work keys and be a 2nd year completer of a CTE program. With the students having both it shows that they have the knowledge and skill set needed to help positively impact their futures and the workforce. With these two requirements, it will give the state's Accountability Model a true indication of how College and Career Ready the students truly are.</p>	<p>In support</p>
<p>Including the WorkKeys assessment in the accountability model is a great idea, but my opinion is that MDE should also require a 2-year high school career &amp; technical course completion along with the Silver level of the WorkKeys assessment.</p>	<p>In support</p>
<p>The ACT WorkKeys test is based on industry standards and is further validation of the importance of career and technical education courses in the modern education system. The completion of these courses gives the students actual working knowledge that will be immediately useful on the job. Many students who don't do as well in traditional education classes excel in career and technical education. Whether it is from the more hands on approach or the various skills offered from career technical classes, many students are able to discover a true talent or interest which helps to encourage and motivate them in obtaining that</p>	<p>In support</p>

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Summary of Comment	MDE Response
<p>high school diploma. Furthermore, they feel better prepared to pursue a career or college education. The ACT WorkKeys Silver is a significant indicator but no more so than the skills students learn through the completion of two-year CTE programs which make them truly competitive in today’s job market.</p>	
<p>I am writing to express my hope that the Mississippi Board of Education will adopt the recommendation of the <u>Accountability Task Force</u> to modify the business rules to allow a score at the Silver level on the WorkKeys assessment to be considered successful as a stand-alone measure instead of the ACT college prep benchmark for purposes of the College- and Career-Readiness component of the State Accountability Model rather than the MDE's recommendation.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I believe that adding the ACT Work Keys test as a national assessment that measures foundational skills required for success in the workplace is a good idea.</p>	<p>In support</p>
<p>I am writing to share my comments with the State Board of Education regarding the addition of the WorkKeys assessment as an indicator in the College and Career Readiness (CCR) component of Mississippi’s State Accountability Model. We have reservations with the Mississippi</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness</p>

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Summary of Comment	MDE Response
<p>Department of Education’s recommendation but support the Accountability Task Force proposal.</p>	<p>(CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>As a CTE Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>As a CTE Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>

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Summary of Comment	MDE Response
<p>As a Teacher, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>As a CTE Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>As a Student Services Coordinator, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>As a CTE Teacher, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>As a CTE Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add</p>

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<p>is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>As a CTE Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>As a CTE Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>As a Career and Technical Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>There are no additional qualifiers for the ACT, yet MDE staff's recommendation requires additional qualifiers of an industry certification or completion of a two-year career pathway for students who choose to enter the workforce rather than attend college when they finish high school. We should not place additional qualifiers on a group of students simply because they are headed to a career rather than to higher education, as doing so implies that career skills are not as important as college skills.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not</p>



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Summary of Comment	MDE Response
<p>MDE staffs' recommendation ignores the recommendation of practitioners and is reminiscent of the staff's efforts in 2019 and 2020 to continue the U.S. History assessment. Although the Student Testing Task Force and the Commission on School Accreditation recommended elimination of the assessment, MDE staff recommended continuation of the assessment and the State Board upheld this recommendation. Mississippi practitioners question the purpose and validity of task forces when MDE ultimately develops and drives recommendations while disregarding the time and expertise of practitioners.</p> <p>MPE supports the recommendation of the Accountability Task Force that the Silver NCRC be the sole indicator of career readiness. We encourage the State Board to adopt the recommendation of the Accountability Task Force which does not require the additional qualifiers.</p>	<p>equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I strongly believe that WorkKeys Silver, along with successful completion of a two-year CTE program with a grade of 70 or higher, would be a strong indicator of student success for Career Readiness.</p>	<p>In support</p>
<p>We are for WorkKeys Silver level in the accountability model.</p> <p>We are not for WorkKeys Plus anything else.</p> <p>Some districts do not have CTE/Industry certifications therefore is not equitable.</p> <p>Currently we do not require ACT plus another avenue.</p> <p>We believe the fair and equitable solution is to use Workkeys as a standalone just as the ACT is currently.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of</p>



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

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

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Summary of Comment	MDE Response
<p>WorkKeys be used as the indicator of student career-readiness for purposes of the Statewide Accountability Model.</p> <p>I oppose the addition of an industry certification to be counted as successful in the accountability model.</p>	<p>used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I do not agree with the Inclusion of the ACT WorkKeys (Silver or Higher) in performance measures as a stand-alone indicator. I do not agree with the Inclusion of the ACT WorkKeys (Silver or Higher) and achievement of a national certification.</p> <p>I do agree with the Inclusion of the ACT Work Keys (Silver or Higher) AND completion of a Two - Year Career and Technical Education Pathway in performance measures of the Mississippi Statewide Accountability System.</p>	<p>In support</p>
<p>As CTE Director, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by</p>

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college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).	considering their work in the CCR component.
I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two-year CTE program with a grade of “C” or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve no less.	In support
<p>I do not support the additional proposed requirement of a national certification in the College and Career Readiness Indicator. Currently, not all career technical programs have national certifications associated with them. Additionally, the ACT national standard is being used as the stand-alone benchmark to determine college readiness. It would not be fair or consistent to mandate that students achieve required scores on two assessments (ACT Work Keys assessment and national certification assessment) to determine career readiness. A Silver Level or higher on the ACT Work Keys assessment should sufficiently demonstrate a student's career readiness.</p> <p>Completion of a two-year CTE program is the strongest indicator of career readiness and should also factor into the College and Career Readiness Indicator. A student who scores a Silver Level or higher on the ACT Work Keys assessment and completes a two-year CTE program is more career ready than one who only scores a Silver Level or higher on the ACT Work Keys assessment. Consideration for adding additional weight to the numerator of the College and Career Readiness Indicator for any student who completes a CTE program and scores a Silver Level or higher on the ACT Work Keys assessment should be strongly considered.</p>	Unsure of position
I recommend that both the Silver level on WorkKeys and the completion of a 2-year career & technical program be recognized as a strong indicator of career readiness. If only a Silver on WorkKeys is recognized, it will not be a true depiction of students that are career ready. These students may only be able to test well or be successful academically. By partnering the WorkKeys Silver level with completion of a 2-year CTE program, the numbers will show a better representation of students that are truly career ready. Students that are completers have not only covered the soft skills required for a career but have also learned job-specific skills needed in the workforce.	In support

**Summary of Administrative Procedures Act (APA) Comments**

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

Summary of Comment	MDE Response
<p>I do not feel that national certifications should be attached to WorkKeys in the accountability model. While they are very important, not all programs offer national certifications. Out of the 2<sup>nd</sup> year students that we have WorkKeys tested this school year, only 46% have the opportunity to earn a national certification. By attaching national certifications along with WorkKeys, this could lead to a push from districts to put students in only those programs which is less than half of our CTE programs offered.</p>	<p>Students may achieve either a national industry certification OR a career pathway.</p>
<p>I am writing this letter regarding the addition of the ACT WorkKeys assessment as an indicator to the College and Career Readiness component of the Mississippi accountability model. As it stands right now, all students are held to the college readiness standards whether they are planning on attending college or not. The addition of the ACT WorkKeys assessment to the College and Career Readiness component brings career readiness to light, which is a major step in the right direction.</p> <p>The ACT WorkKeys test is a great measure of career readiness for students and I am glad that it is being considered as an addition to the College and Career Readiness component of the accountability model. I am requesting that you consider giving additional weight to the numerator of the College and Career Readiness indicator for any student who completes a Career Pathway Program. I recommend that if a student scores silver or above on the ACT WorkKeys assessment then he/she should count as a 1 in the numerator and if that student also completes a career pathway program then he/she should calculate at a higher weight of 1.2 in the numerator.</p>	<p>In support</p> <p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>We are in support of the WorkKeys Silver level in the accountability model. We are not in support of the WorkKeys Plus or anything else being presented. It is not fair since not all school districts have CTE/Industry certifications available for their students so it's not the same for everyone. With the model now, we do not currently use the ACT plus any other measurement. We are in support to use Workkeys by itself, just like we currently use the ACT in the model.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the</p>

**Summary of Administrative Procedures Act (APA) Comments**

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

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

**Summary of Administrative Procedures Act (APA) Comments**

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

Summary of Comment	MDE Response
<p>The strongest indicator of Career-Readiness within the Accountability Model should be Career Pathway training through completion of a CTE program providing Mississippi students with the highest level of career training.</p> <p>The CTE Pathway programs that DO NOT currently have national certifications associated with them. SHOULD add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.</p> <p>Consider adding weight to the numerator of the College-and Career-Readiness Indicator. The rationalization for this recommendation is that students who complete a career pathway program and graduate high school with specialized career skills will be considerably more career ready than a student who <u>only</u> completed the ACT WorkKeys at the Silver Level. This compares to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).</p>	<p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>I would like to advocate for MDE to include all CTE classes in some way. I believe that every CTE program is important. I believe that WorkKeys Silver along with completion of a 2 year CTE program with a grade of "C" or higher would be a fair and comparable indicator of student success for Career Readiness along with the Industry Certification.</p>	<p>In support</p>
<p>I agree with including the ACT WorkKeys in the scores for College and Career Readiness. I feel it will be beneficial to all schools and districts. However, I feel that pairing the requirement of Silver level on the WorkKeys with the requirement that students successfully complete an industry certification or career pathway is an unfair requirement for smaller schools and districts. While this requirement will benefit districts who have numerous certification programs and who have enough faculty to offer various courses throughout the day, for those of us in smaller districts, our students often must make choices between CTE classes, finishing the second year of CTE programs, and taking advanced classes. This is because often our advanced classes or our CTE courses are often only offered once during the school day or school year due to having a limited number of faculty. Therefore, students often cannot participate in both. In including this paired requirement there will</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely</p>

**Summary of Administrative Procedures Act (APA) Comments**

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

Summary of Comment	MDE Response
<p>be many students who can score at high levels on the WorkKeys but who still cannot be counted as College and Career ready because they had to make choices regarding which classes they could complete.</p>	<p>result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<ul style="list-style-type: none"> <li>● Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.</li> <li>● Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, we do not believe national certifications should also be required along with the ACT WorkKeys. However, the MASCTA Board of Directors strongly supports the MDE’s recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.</li> <li>● Finally, we request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program. For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.</li> </ul>	<p>In support</p> <p>CTE is currently represented in the Accountability model in the Acceleration component. The proposed policy change would add additional measures of success for CTE students in the model by considering their work in the CCR component.</p>
<p>I believe the completion of a 2 year CTE program is also an indicator to employers that the student will complete something they start. I also</p>	<p>In support</p>



**Summary of Administrative Procedures Act (APA) Comments**

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

Summary of Comment	MDE Response
<p>believe that a Silver Level requirement on the WorkKeys assessment would help the job outlook of the students.</p>	
<p>I believe that ACT WorkKeys is a useful tool for the students of Mississippi. I believe that using ACT WorkKeys will expand future opportunities for the students of Mississippi. I also believe that using ACT WorkKeys in the accountability model without qualifiers shows businesses that the state of Mississippi is committed to training students to be qualified “work ready” employees. I believe the accountability task force has great intentions with their recommendation because they see the value in not limiting the number of student scores that can be used in the CCR component of the current accountability model.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>Recommendations to the State Board of Education regarding implementation of ACT WorkKeys</p> <p>We are presenting additional changes to the College- and Career-Readiness Indicator section related to the implementation of WorkKeys:</p> <p>1 - Administer WorkKeys for all students in their second year of a CTE program.</p> <p>If WorkKeys is truly a quality measure of career-readiness, it should be treated as such, rather than used as an optional replacement for the college-readiness test. The test should be administered for students in the</p>	<p>The MDE does not advocate adding the ACT WorkKeys as a required assessment.</p>

**Summary of Administrative Procedures Act (APA) Comments**

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

Summary of Comment	MDE Response
<p>second year of an industry certification or career pathway program. While this recommendation will likely require state funding, there may be opportunities to fund the administration of WorkKeys through partnerships between school districts and regional or state economic development organizations.</p> <p>2 - Include WorkKeys as a third component of the College &amp; Career Readiness (CCR) indicator. The current CCR component consists of ACT Math and ACT English/Reading components.</p> <p>WorkKeys should be included as a third measure of the College and Career Readiness component. This Career-Readiness component should count for 10 points of the 50pt CCR component, along 20 points for ACT Math and 20 points for ACT English/Reading.</p>	
<p>We are in opposition of the MDE's modification of the Accountability Task Force recommendation for measuring student success on the Workkeys assessment. We fully support the use of a stand-alone Silver level benchmark on Work keys as the indicator of student CAREER-readiness for the purposes of the CCR Component in the Statewide Accountability Model.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>

**Summary of Administrative Procedures Act (APA) Comments**

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

Summary of Comment	MDE Response
<p>I am unequivocally supportive of using the WorkKeys Assessment. However, I do believe there are some concerns as it relates to the most recent proposal made to include WorkKeys (NCRC) in the accountability model under the CCR portion paired with another standard (national certification or MDE approved standard).</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>
<p>I am writing on behalf of the Laurel School District regarding the ACT WorkKeys assessment and submit the following as part of the APA process.</p> <p>We feel that students scoring Silver or above on the WorkKeys assessment should be included in the numerator for the Math and/or English components of the College and Career Readiness component in lieu of the ACT benchmark requirement.</p> <p>We do not agree with MDE’s modification that results in students having to complete both their industry certification, along with meeting the Silver level on the WorkKeys test to be included in the component. Currently, many programs do not offer a national certification or an equivalent.</p>	<p>If a Silver-level National Career Readiness Certification (NCRC) is used alone as an indicator of success in the College-and Career-Readiness (CCR) component, the existing measures of success in CCR would be effectively negated. As data has shown, a Silver NCRC is not equivalent to the current ACT assessment benchmarks in English or Reading and Mathematics; therefore, use of the Silver NCRC alone would lower the bar for performance in the CCR component and would likely result in an inappropriate focus on</p>

**Summary of Administrative Procedures Act (APA) Comments**

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

<b>Summary of Comment</b>	<b>MDE Response</b>
<p>We feel this combination does not truly measure whether a student is “career ready.” According to reports, industries consider a Silver level as a good indicator of success.</p> <p>We are in favor of allowing a Silver level score to be considered successful in lieu of the ACT college prep benchmark.</p>	<p>simply achieving a Silver NCRC. The MDE does not view such a policy as being in the best interest of students. By including a career pathway or industry certification in the measure of success, there is greater assurance that the student who achieves a Silver NCRC, rather than achieving ACT benchmarks, is indeed in a career-readiness pathway and graduates prepared for a career.</p>

## Angela Kitchens

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**From:** Wanda Clark <[wclark@mpsdconnect.org](mailto:wclark@mpsdconnect.org)>  
**Sent:** Friday, December 18, 2020 2:24 PM  
**To:** Accreditation Shared  
**Subject:** Re: ACT Workkeys

I would like to add that I am currently working in the public school system as a Teacher Assistant.

On Fri, Dec 18, 2020 at 2:22 PM Wanda Clark <[wclark@mpsdconnect.org](mailto:wclark@mpsdconnect.org)> wrote:

Hello, I read the MDE Communications concerning the WorkKeys. If I am comprehending this correctly, is this letter stating that an ACT Workkeys will be accepted in place of an ACT? I am currently enrolled at USM pursuing a Bachelor Degree in Child and Family Science. I took the Workkeys on 7/31/07. The score results were: Math level 5 and Reading Level 4. Will this be acceptable? If not, Will I have to retake it? I've taken the ACT tests for the past few years trying to receive the 21, but was unsuccessful each time.

## Angela Kitchens

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**From:** Tyler Hansford <[hansfordt@unionyellowjackets.org](mailto:hansfordt@unionyellowjackets.org)>  
**Sent:** Monday, January 4, 2021 10:28 AM  
**To:** Accreditation Shared  
**Cc:** smithw; rushd; Zach Robinson  
**Subject:** UPSD APA Comment on ACT Work Keys

The Union Public School District supports the use of ACT WorkKeys as an indicator of college and career readiness. However, we do think MDE/MS Legislature should consider funding the administration of the exam at least on a one time basis as is applicable to the ACT. Also, teachers may need professional development to become more familiar with the content of the exam.

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Tyler C. Hansford, Ed.D  
Superintendent  
Union Public School District  
417 S. Decatur St.  
Union, MS 39365  
[hansfordt@unionyellowjackets.org](mailto:hansfordt@unionyellowjackets.org)

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

**Angela Kitchens**

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**From:** True, Kathy <ktrue@wvwd.k12.ms.us>  
**Sent:** Tuesday, January 5, 2021 1:22 PM  
**To:** Accreditation Shared  
**Subject:** ACT WorkKeys

Dear Mr. Burrow,

I am writing with concerns about including ACT WorkKeys in conjunction with industry certifications in the accountability model. In a school as small as mine, CTE courses are not highly sought after; in fact, only 17 students are on the NCCER roster--7 for carpentry and 10 for construction--which is the only CTE course we offer with an industry certification.

Since our Mississippi curriculum standards are devoted to being college and career ready, a silver level on the ACT WorkKeys in itself would serve well as the criterion of workplace readiness, while the ACT would suffice as the benchmark for college readiness.

Thank you for the opportunity to comment.

Best Regards,

--  
Kathy True, EdS  
Water Valley School District  
Federal Programs Director  
District Testing Coordinator  
544 Market Street  
P.O. Box 788  
Water Valley, MS 38965  
Phone (662) 473-1203  
Fax (662) 473-1225

If we create a culture where every teacher believes they need to improve, not because they are not good enough, but because they can be even better, there is no limit to what we can achieve.--Dylan William

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## Angela Kitchens

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**From:** Alexandra Melnick <alexandrasmelnick@gmail.com>  
**Sent:** Thursday, January 7, 2021 3:02 PM  
**To:** Accreditation Shared  
**Subject:** Public Comments Re: Work Keys

Good afternoon!

I hope you are well! I am a resident of Leland, MS and I am making a public comment about the proposed change to the accountability model.

I disagree strongly, and urge MDE to consider the Accountability Task Force recommendation instead, and have the Silver level assessment or higher be included in the numerator for Math/Reading part of CCR instead of the ACT, and for students in the career field not be forced to deal with additional hurdles. To do so otherwise creates a two track and inherently unfair system.

Best,

*Alexandra Melnick*  
*Acting Executive Director of Greenville Renaissance Scholars*  
*Teach Plus Fellow 2020-2021*



## Angela Kitchens

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**From:** Brenda Russell <brendamrussell@hotmail.com>  
**Sent:** Thursday, January 7, 2021 3:38 PM  
**To:** Accreditation Shared  
**Subject:** Comments for Graduates

Thank you for allowing others to have input to encourage future high school students.

I hope students are also allowed to share their ideas and opi and on this subject matter.

Sometimes high school can be very difficult and overwhelming. Future careers can seem daunting for young people. Some careers demand academic attention that need a certain foundation. Experience is always an asset but it shouldn't take the place of a strong academic background.

Just saying the word ACT Test can stir up confusion and fear. It would have helped me to get tutoring in the 9th grade throughout the 11th grade. Some students take the ACT Test in the 9th, 10th, 11th, and 12th grade and then take the best score. The pivotal moment can be how long College Recruiters can wait to get scores notated for potential scholarships.

I want to see students have options to work during the summers, this will count toward experience. If parents agree, maybe the first year can be spent working. Then a decision can be made regarding College.

All students are not 4 year college candidates. Some students maybe 2 year college candidates. I did pretty well with the latter.

Students may also want to be an Apprentice in Training, hands-on education and training with jobs guaranteed at graduation.

Life is so good with you plan to succeed at the level that brings health, passion, volunteerism, and giving back to other students.

Choices are good to embrace.

Brenda M Russell  
A Concerned Parent

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

## Angela Kitchens

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**From:** Marian Wright <mgazw2@yahoo.com>  
**Sent:** Thursday, January 7, 2021 4:05 PM  
**To:** Accreditation Shared  
**Subject:** MDE comments on career readiness

I taught secondary and college English classes for over thirty years. I do not believe that students who are working toward vocational careers should all be required to have the same ACT requirements as students who are planning to go to college. I agree that the question are you going to require college bound students to build or rebuild a car points out the ridiculous nature of requiring a double standard for vocational students. The work keys standard should be enough. Different people have different skills and different types of intelligence. Everybody should not be required to take the same kinds of graduation assessments. The multiple choice testing that students have been forced to take for years have robbed the students of intellectual imitative. At least they did so for a long time as teachers were advised to make all tests and most practices like the state tests. At one point the state was discussing using portfolio assessment where teachers kept portfolios of student work and student-made projects to show what the students were able to do. They discussed training peer teachers to go to different districts to help evaluate portfolios and advise the teachers whose portfolios were being evaluated on what seemed to be working and how to improve perceived areas of weakness. Instead of simply seeking areas of weakness, such an approach would give students a chance to show what they are capable of doing and encourage them to have a sense of pride in their work.

Sent from Marian Wright

## Angela Kitchens

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**From:** Diana Bentley <diana.g.bentley@gmail.com>  
**Sent:** Thursday, January 7, 2021 4:30 PM  
**To:** Accreditation Shared  
**Subject:** WorkKeys

I am a parent and an educator. I strongly support the Silver level score WorkKeys certification for an accountability model; however, I do not feel that it should be a stand alone benchmark for success. I feel it would be discriminatory to require students in the career pathway to pass multiple tests, while the ACT is the only benchmark for academic success. I only one is necessary for academics, one should be adequate for the career pathway.

## Angela Kitchens

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**From:** Jon Delperdang <jondelperdang@gmail.com>  
**Sent:** Thursday, January 7, 2021 9:47 PM  
**To:** Accreditation Shared  
**Cc:** Amanda Delperdang  
**Subject:** Statewide accountability model comment

Mr. Burrows,

I hope this finds you well. My spouse, Amanda, and I (Jon) are writing to make a comment on the change being proposed to the Statewide Accountability Model. We agree with the stance of the Parents' Campaign, which is:

"The Parents' Campaign supports the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model."

As you are likely familiar, Ms. Loomer has written a letter that expresses a view we both also agree with. Here is a link to her letter: <https://msparentscampaign.org/wp-content/uploads/2021/01/TPC-Public-Comments-WorkKeys-Addition-to-Acct-Model.pdf>.

Best wishes to you and your loved ones at the start of this 2021 year,

Jon and Amanda Delperdang

## Angela Kitchens

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**From:** James Johnson-Hill <jhill@laurelschools.org>  
**Sent:** Thursday, January 7, 2021 10:22 PM  
**To:** Accreditation Shared  
**Subject:** Proposed Accountability Model Change

Mr. Burrow,

While I strongly support the addition of WorkKeys to the CCR component, I have to oppose the Mississippi Department of Education's (MDE's) modification of the Accountability Task Force recommendation for measuring student success on the WorkKeys assessment.

The Task Force recommended using the national industry standard Silver level score on the WorkKeys assessment as a stand-alone benchmark of success, just as the ACT national standard is being used as a stand-alone benchmark of success for college prep students. MDE has recommended that career track students be required to meet both the national industry standard Silver level score *and* an additional industry certification or career pathway in order to be counted as successful in the accountability model. Students on a college prep track are not required to have an additional certification, only the ACT benchmark score.

I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.

Sincerely,

**Dr. James Johnson-Hill, President**  
Board of Trustees  
Laurel Municipal School District



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## Angela Kitchens

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**From:** jtsotc <jtsotc@peoplepc.com>  
**Sent:** Friday, January 8, 2021 1:06 AM  
**To:** Accreditation Shared

Dear Sir,  
Please accept the Parent's Campaign recommendations. This will ensure all students are counted.  
Janet Shaw

Sent via the Samsung Galaxy S® 6, an AT&T 4G LTE smartphone

# Parents' Campaign

January 6, 2021

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

Dear Mr. Burrow,

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

The Parents' Campaign disagrees strongly with the Mississippi Department of Education's (MDE's) modification of the Accountability Task Force recommendation regarding the inclusion of the WorkKeys assessment as an indicator in the CCR component. **We urge the State Board of Education to adopt instead the Accountability Task Force recommendation.**

The Accountability Task force recommended that a student scoring at the Silver level or higher on the WorkKeys assessment be included in the numerator for the Mathematics and/or English/Reading components of the CCR component in lieu of the ACT benchmark requirement. The MDE has modified that recommendation to require that a student meet the Silver benchmark **and** successfully complete an industry certification or career pathway in order to be included in the CCR component, an additional and unnecessary "hoop" through which only career track students would have to jump, seemingly giving college prep students preferential treatment.

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

The MDE has alleged that the WorkKeys industry standard benchmark is not an adequate metric because the career track students have not, on average, met all of the required benchmarks on the ACT college prep assessment. It makes no more sense to suggest that a career track student should meet the college prep benchmarks than it does to suggest that a college prep student should meet the career

track benchmarks. Will the MDE require that a college prep student be able to rebuild an automobile engine or plumb a home to be considered successful? **The implication that career skills are somehow "lesser" than college prep skills is the very stereotype that has hampered the success of countless students and led many to drop out of school altogether.** These are two separate and equally viable tracks with two separate and equally viable measures that should be recognized as such.

The MDE staff's statement to the State Board of Education that the Accreditation Commission supported unanimously the MDE's modified recommendation is not a fair representation of the Commission's debate, during which Commission members gave considerable pushback to the MDE proposal and expressed significant concerns about the modification being proposed. The comments of numerous Commission members indicated agreement with the Accountability Task Force recommendation that a stand-alone Silver level score should be the indicator of success that would include a student in the College- and Career-Readiness component of the model, a recommendation the Commission was not allowed to consider.

Additionally, the assertion that use of the Silver level score as a stand-alone metric would require a resetting of cut scores is a moot point. Dr. Wright has said on several occasions that assessment and accountability will be "decoupled." She has acknowledged that there will likely be no accountability ratings for the second year in a row and that assessments cannot be fairly administered when so many students are learning in an all-virtual environment, which means that there will be no valid growth component for the next round of accountability ratings. Cut scores will almost certainly have to be reset, regardless of any change in the business rules to accommodate the WorkKeys assessment.

**It is our hope that the Mississippi Board of Education will adopt the recommendation of the Accountability Task Force and modify the business rules to allow a score at the Silver level on the WorkKeys assessment to be considered successful as a stand-alone metric in lieu of the ACT college prep benchmark for purposes of the College- and Career-Readiness component of the State Accountability Model.**

Thank you for your work to ensure that Mississippi students and teachers have the resources and support they need to be successful.

Regards,



Nancy Loome  
Executive Director



## Angela Kitchens

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**From:** Robert Barnard <rbarnard@spanola.net>  
**Sent:** Friday, January 8, 2021 8:19 AM  
**To:** Accreditation Shared; Joe Azar  
**Subject:** Work Keys Silver

I am in favor of using only the Work Keys Silver as the rating for success in Career Readiness. As a community that is striving to be a Work Keys City our industries are adapting this measure as the standard for hiring. It only makes sense to use the same as an indicator of completion in our schools. I urge you to contact Joe Azar at the Panola Partnership for further industry input. We are really hard at work convincing our industrial partners to use ACT Works and our new training center The Concourse will need to align their training with the same standards.

Thanks for your consideration

Robert Barnard Jr  
Work Based Learning Instructor  
South Panola High School

**Angela Kitchens**

---

**From:** Stein, Benjamin <bstein@rcsd.ms>  
**Sent:** Friday, January 8, 2021 8:26 AM  
**To:** Accreditation Shared  
**Subject:** Proposed Change to the Statewide Accountability Model

Good Morning,

As a Principal of a large High School in Mississippi (Northwest Rankin High School), I agree with the Task Force recommendation to use the national industry standard Silver level score on the WorkKeys assessment as a stand-alone benchmark of success, just as the ACT national standard is being used as a stand-alone benchmark of success for college prep students.

Ben Stein  
Principal  
Northwest Rankin High School  
601-992-2242  
Fax # 601-992-6005  
5805 Hwy 25  
Flowood, MS 39232



**Rankin County School District**

**Mission:** Bring Everyone's Strengths Together! We will all intentionally focus on empowering our students to reach their maximum potential by embracing opportunities and challenges while cultivating a tradition of distinction in education.

**Vision:** Continue a tradition of excellence by providing a world-class education that empowers all to grow through curiosity, discovery, and learning.

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## Angela Kitchens

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**From:** bjmylons57@gmail.com  
**Sent:** Friday, January 8, 2021 1:22 PM  
**To:** Accreditation Shared  
**Subject:** WorkKeys assessment

Mr. Burrow:

I support the addition of WorkKeys to the CCR component, but I oppose the MDE's modification of the Accountability Task Force recommendation for student success on the WorkKeys assessment. The Task Force recommended using the national industry standard Silver level score on the WorkKeys assessment as a stand-alone benchmark of success, just as the ACT national standard is being used as a stand-alone benchmark of success for college prep students. MDE has recommended that career track students be required to meet both the national industry standard Silver level score *and* an additional industry certification or career pathway in order to be counted as successful in the accountability model. Students on a college prep track are not required to have an additional certification, only the ACT benchmark score. I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.

**Thank you,  
Beverly Lyons  
Former Teacher and Retired State Employee**

Sent from my iPhone

**Angela Kitchens**

---

**From:** Laura Cameron <lcameron@covingtoncountyschools.org>  
**Sent:** Friday, January 8, 2021 1:29 PM  
**To:** Accreditation Shared  
**Subject:** Comments on Statewide Accountability Model

Mr. Burrow,

I am writing to express my concern about adding the WorkKeys career-readiness Indicator in addition to national certification exams already required for some second year CTE completers. I firmly support making the WorkKeys the SOLE indicator for accountability. The state of Mississippi has long over-tested our students and the addition of another test will, in my opinion, be counter-productive. The Perkins Act already holds my CTE programs accountable for our second year completers scoring PROFICIENT on the Algebra 1, English 2, and Biology 1 state tests. Students are only required to PASS those tests to graduate. I realize the state of Mississippi cannot change this, but it is grossly unfair. Until those academic programs start teaching CTE curricula in their academic classroom, I will never understand this requirement.

The MS CPAS has been the measure of Technical Skill Attainment, with national certification exams taking the place of the second year MS CPAS in programs that have been linked to a national certification. The curriculum is not aligned to many of these national certification exams. If MDE continues to add to the already overloaded testing requirements, I fear my student numbers will become less and less. This country needs skilled workers and those skilled workers are just not being produced. Until the focus of schools becomes what is best for all students, and not just college bound students, this situation will not be rectified.

Business and Industry have sought ways to build career readiness in the past and have used the WorkKeys to judge this. In post-secondary programs, the students are required to take both the WorkKeys and the National Certification Exam associated with their program. THAT makes sense. Making high school students do both does not. Currently, I have 3 programs who will be testing on National Certification Exams, two of which I know do NOT follow the second year curriculum of the program. Until MDE stops making testing students their top priority and makes EDUCATING them the top priority, Mississippi schools will continue to remain on the low end of the totem pole.

Respectfully submitted,

Laura U. Cameron  
Director  
Covington County CTE Complex  
P.O. Box 1268  
Collins, MS 39428  
Phone: (601) 765-8253  
Fax: (601) 765-9120

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## Angela Kitchens

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**From:** Patricia Ellison <pellison@pcsd.ms>  
**Sent:** Friday, January 8, 2021 1:58 PM  
**To:** Accreditation Shared  
**Subject:** Silver Level Recommendation

Good Afternoon,

My name is Patricia Ellison. I currently serve as the CTE Director for Pontotoc County School District. I am in my fourth year as director and 17th year in CTE altogether. I started WorkKeys testing at my center four years ago and have seen tremendous success. Many industries require silver or higher to be employed. I feel that we need to push for silver level or higher be included in accountability ratings. The industries that we work with, do not look at state tests for hiring purposes. If we are truly in this job to help students then we will focus on WorkKeys and ACT.

--

Patricia Ellison  
Director  
Pontotoc Ridge Career & Technology Center  
662-489-1826 Phone  
662-489-0704 Fax

*"The strongest people are not those who show strength in front of us, but those who win battles we know nothing about."*

### Confidentiality Disclaimer

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**Angela Kitchens**

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**From:** Christy Wheeler <christyjane13@yahoo.com>  
**Sent:** Friday, January 8, 2021 3:18 PM  
**To:** Accreditation Shared  
**Subject:** Proposed change to statewide accountability model

**I support the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.**

Christy Wheeler

**Angela Kitchens**

---

**From:** Koretta Sullivan <ksullivan@spanola.net>  
**Sent:** Monday, January 11, 2021 11:24 AM  
**To:** Accreditation Shared  
**Subject:** Accountability

To Whom It May Concern:

I am sending this email to let you know that I am in favor of the ACT Workkeys Silver being the lone indicator of CTE success. Please consider this request. Thank you!

Koretta K. Sullivan

**Angela Kitchens**

---

**From:** Shaquita Lathon <shaquitalathon@gmail.com>  
**Sent:** Monday, January 11, 2021 12:09 PM  
**To:** Accreditation Shared  
**Subject:** Accreditation

I am in favor of making ACT Workkeys Silver an indicator of CTE success. This a measure of Career readiness for students. College and Career Ready has no career ready component! This test helps encourage students to pursue two year colleges and certificate programs with almost guaranteed employment. As a school counselor, I have seen first-hand it's success.

Thanks!  
Shaquita Lathon



**Angela Kitchens**

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**From:** Jerel Wade <jwade@pcsdms.us>  
**Sent:** Monday, January 11, 2021 2:33 PM  
**To:** Accreditation Shared  
**Subject:** Work Keys as CCR component

Mr. Burrow,

As a high school principal, I believe using the WorkKeys Silver Level Certificate as an Indicator for College-and-Career Readiness for purposes of accountability is appropriate. However, for vocational students, I do not feel that placing this requirement on them in addition to obtaining industry certification is appropriate. Vocational students should not be required to successfully complete both of these certifications in order to be counted positively in the accountability model.

I believe an "either/or" approach instead of a "both/and" should be used for vocational students obtaining Workkeys Silver Level and industry certification as it pertains to accountability.

Sincerely,

--  
Jerel Wade, Principal  
Perry Central High School  
9899 Hwy 98  
New Augusta, MS 39462  
601-964-3235

## Angela Kitchens

---

**From:** James Johnson-Hill <jhill@laurelschools.org>  
**Sent:** Monday, January 11, 2021 3:31 PM  
**To:** Carey Wright  
**Cc:** Accreditation Shared; Washington Cole; Deborah Douglas; Angela Bass; Jason Dean; Johnny Magee  
**Subject:** Reassignment of Grades to Districts

Dr. Wright,

I am writing to express my objection to the plan to reassign grades to districts. It is not fair to superintendents, principals, teachers, communities and children who have been working faithfully and tirelessly to get off the "F" list. The Laurel Municipal School District is living under a grade, and a stigma, that is no longer an accurate evaluation of the educational performance of our district. We have made great strides and Covid-19 has literally robbed us of the opportunity to show this to the state and our community. Our teachers, administrators and students continue to be deflated over having to live this year under a score that they did not earn and do not deserve.

Please do not deliver another educational gut punch to our teachers, administrators and students all over the state of Mississippi who are already fighting frustration, discouragement, anxiety, uncertainty and low morale due to the toll of these unprecedented challenges. For the Laurel School District, it is a black cloud over the entire community. We need MDE and the State Board of Education to be an understanding partner in this endeavor and not further encumber us with the unjust weight of hopelessness.

Respectfully,

**Dr. James Johnson-Hill, President**  
Board of Trustees  
Laurel Municipal School District



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**Angela Kitchens**

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**From:** Jessey Higdon <jhigdon@spanola.net>  
**Sent:** Tuesday, January 12, 2021 9:11 AM  
**To:** Accreditation Shared  
**Subject:** Work Keys

I am in favor of making ACT Workkeys Silver the lone indicator of CT success.

Thank you,

*Jessey Higdon Jr.*  
*Industrial Manufacturing Instructor*

**Angela Kitchens**

---

**From:** Milli Flint <mflint@spanola.net>  
**Sent:** Tuesday, January 12, 2021 10:12 AM  
**To:** Accreditation Shared  
**Subject:** silver workkeys

I am in favor of making ACT Workkeys Silver the lone indicator of CT success!

--

Milli Washington Flint, RN  
SPHS Health Sciences and Clinical Services Instructor  
[mflint@spanola.net](mailto:mflint@spanola.net)  
(662) 563 - 8992

**Angela Kitchens**

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**From:** Wendy McDonald <mcwendy115@gmail.com>  
**Sent:** Tuesday, January 12, 2021 11:06 AM  
**To:** Accreditation Shared  
**Subject:** Statewide Accountability Model

**As a former public school teacher, college dean and workforce training education the use of a stand-alone Silver level benchmark on WorkKeys as the indicator of student career-readiness for purposes of the Statewide Accountability Model.**

# Fairview Attendance Center

66 Fairview School Rd.  
Golden, MS 38847

Phone: 662-585-3127  
Fax: 662-585-3139

Mr. Benjie Ewing, Principal  
Mrs. Keitha O'Brian, Asst. Principal

**Mission Statement: "Every stakeholder, everyday, working toward achievement the CARDINAL way."**

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Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mdek12.org](mailto:accreditation@mdek12.org)

Dear Mr. Burrow,

My name is Benjie Ewing. I am the principal of Fairview Attendance Center. Please accept these public comments submitted regarding the addition of the WorkKeys assessment as an indicator of success in the College-and Career- Readiness (CCR) Component of the State Accountability Model.

As it currently stands, every student, even those students who are not college bound, are required to meet the benchmark for college readiness to be considered "successful." It is my belief that this is fundamentally unfair to those students who plan to enter the workforce upon graduation. I am a firm believer in quality CTE programs. I am the son of a carpenter who built houses for many years. Access to quality CTE programs will help prepare the next generation of carpenters, welders, auto mechanics, and other workers. The current state of the world has shown a great need for these workers. We need to foster this need as educators and truly provide for our students who desire to enter into the workforce. It is my belief the WorkKeys assessment at a Silver level, paired with the successful completion of a two year CTE program with a grade of "C" or higher, would accomplish this task.

Our country has been through a major shift due to the ongoing pandemic. Our eyes have been opened to a renewed need for CTE courses and preparing interested students for careers that do not require a college degree or higher. CTE has the opportunity to play a great role in education as we navigate new waters. We need to offer CTE courses in which students are interested. We do not need to only adhere to ones that offer industry certification. You have the opportunity to promote CTE courses and students having the opportunity to successfully complete a two-year program and earn vital skills needed.

I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two year CTE program with a grade of "C" or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve this opportunity.

Sincerely,

Benjie Ewing,  
Principal Fairview Attendance Center



Itawamba County School District

Jan. 8, 2021

Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mde.k12.org](mailto:accreditation@mde.k12.org)

Dear Mr. Burrow,

Please accept these public comments submitted regarding the addition of the WorkKeys assessment as an indicator of success in the College-and Career- Readiness (CCR) Component of the State Accountability Model.

As it stands, every student, even those students who are not college bound, are required to meet the benchmark for college readiness to be considered "successful." This is the reason industry leaders, education leaders, and elected officials have called for the addition of a true indicator to measure career readiness which will assess the work school districts have done to provide students who are on a career track with skills needed to be successful. MDE is advocating for WorkKeys Silver and Industry Certification in order to meet this requirement. However, it is my belief the WorkKeys assessment at a Silver level, paired with the successful completion of a two year CTE program with a grade of "C" or higher, would accomplish this task.

Itawamba County currently offers nine CTE programs with only four providing the opportunity for Industry Certification. This school year, we had 78 students who were WorkKeys tested. Out of those students, 58% scored Silver or higher. However, only 46% of the students tested have the opportunity to earn industry certification. Requiring this certification would not be fair to the many students who complete two years of our other programs which do not currently offer the opportunity for certification.

Our school district offers the only Meats program in the state of Mississippi. This popular program is very successful and traditionally has a waiting list for students wanting to enroll. The demand is often greater than can be supplied. Do we advocate telling students not to enroll in this class in order to take a class that offers certification? In addition, currently Health Sciences will implement industry certification this year but we do not know if it will be included in accountability. The pandemic has shown the demand for students willing to go into the medical

field. It is my strong belief that it is not fair to require WorkKeys Silver and Industry Certification when so many CTE programs in Mississippi do not currently offer that option.

Our country has been through a major shift due to the ongoing pandemic. Our eyes have been opened to a renewed need for CTE courses and preparing interested students for careers that do not require a college degree or higher. CTE has the opportunity to play a great role in education as we navigate new waters. We need to offer CTE courses in which students are interested. We do not need to only adhere to ones that offer industry certification. You have the opportunity to promote CTE courses and students having the opportunity to successfully complete a two-year program and earn vital skills needed.

I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two year CTE program with a grade of "C" or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve no less.

Thank you for your dedication to the students of Mississippi and your work to ensure all Mississippi students and teachers have the necessary tools and support to be successful.

Sincerely,

Trae Wiygul  
Superintendent of Education  
Itawamba County School District





# *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

January 12, 2021

Mr. Alan Burrow  
Office of District and School Performance  
Mississippi Department of Education  
[accreditation@msdekt2.org](mailto:accreditation@msdekt2.org)

Dear Mr. Burrow:

I am writing to share my comments with the State Board of Education regarding the addition of the WorkKeys assessment as an indicator in the College and Career Readiness (CCR) component of Mississippi's State Accountability Model. On its face, it appears as a positive addition to the accountability model since ACT (college readiness) is the only measure in the component at present (no career readiness indicator). We disagree with the Mississippi Department of Education's recommendation but support the recommendation from the Accountability Task Force.

The Accountability Task Force recommended the inclusion of students scoring at the Silver level or higher on the WorkKeys assessment without any qualifiers. That recommendation was modified by the Mississippi Department of Education by adding the qualifiers of either the completion of a two year career pathway or the attainment of a recognized industry certification. Once again, this seems to attach a stigma to career technical education.

All juniors are required to take the ACT which is included in the accountability model. There are no qualifiers attached such as meeting the IHL entry requirements or on a college diploma track. Yet, the Mississippi Department of Education's recommendation for WorkKeys includes qualifiers which seem to "lessen" the value of our Career Technical programs by adding the additional requirements of completion and certification.

The Mississippi Department of Education, along with its Technical Advisory Committee (TAC) changed the recommendation of the Accountability Task Force prior to placing it on the agenda for the Commission on School Accreditation. They justified their change in the recommendation based on a

study comparing ACT benchmarks to the ACT WorkKeys subtest scores. These are two different tests which assess different skills. Using the ACT benchmarks for WorkKeys is unrealistic.

The ACT is a college-readiness exam (achievement test) which measures what a student has learned in school and is used as a predictor of college success. While on the other hand, ACT WorkKeys measures a range of both soft and hard skills which are crucial to success in the workplace across industries. Successful completion of WorkKeys, without an industry certification or completion of a two year program, can lead to a National Career Readiness Certification which tens of thousands of employers recognize. Currently, many communities in Mississippi have been certified or are working toward certification as an ACT Workforce Ready Community. For example, Forrest County was certified in May 2020 and now has 166 employers in Forrest County who recognize or recommend ACT WorkKeys NCRC.

We agree with adding ACT WorkKeys to the model but disagree with the additional qualifiers of industry certification and/or two year program completion which the Mississippi Department of Education is recommending for an ACT WorkKeys score to be included in the CCR component of Mississippi's Accountability Model. We urge you to adopt the **recommendation of the Accountability Task Force** which does not add the qualifiers of industry certification and/or two year program completion to the ACT WorkKeys score in order to be included in the CCR component of the accountability model. In order to serve all students and to include all students in the accountability model, we must shift from the mindset of "everyone has to go to college" to supporting that there are multiple options for all students.

Thank you for your time and consideration to ensure that we meet the needs of all students in Mississippi.

Sincerely,



Donna H. Boone, Ph.D.  
Superintendent

## Angela Kitchens

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**From:** LeAnne Robinson <lrob1428@outlook.com>  
**Sent:** Tuesday, January 12, 2021 4:08 PM  
**To:** Accreditation Shared  
**Subject:** public comment on WorkKeys

Jan. 12, 2021

Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mdck12.org](mailto:accreditation@mdck12.org)

Dear Mr. Burrow,

Please accept these public comments submitted regarding the addition of the WorkKeys assessment as an indicator of success in the College-and Career- Readiness (CCR) Component of the State Accountability Model.

MDE is advocating for WorkKeys Silver and Industry Certification in order to meet this requirement. However, it is my belief the WorkKeys assessment at a Silver level, paired with the successful completion of a two year CTE program with a grade of "C" or higher, would accomplish this task.

I have two boys who are currently participating in the Welding program offered at the Itawamba Career and Technical Center. This program does offer industry certification, but both boys participated in our school district's Horticulture program their 9<sup>th</sup> and 10<sup>th</sup> grade years. This popular program is very successful and helps prepare students for college or career. Do we advocate telling students not to enroll in this class in order to take a class that offers certification? In addition, currently Health Sciences will implement industry certification this year but we do not know if it will be included in accountability. The pandemic has shown the demand for students willing to go into the medical field. It is my strong belief that it is not fair to require WorkKeys Silver and Industry Certification when so many CTE programs in Mississippi do not currently offer that option.

Our country has been through a major shift due to the ongoing pandemic. My eyes have been opened to a renewed need for CTE courses and preparing interested students for careers that do not require a college degree or higher. CTE has the opportunity to play a great role in education as we navigate new waters. We need to offer CTE courses in which students are interested. We do not need to only adhere to ones that offer industry certification. You have the opportunity to promote CTE courses and students having the opportunity to successfully complete a two-year program and earn vital skills needed.

I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two year CTE program with a grade of "C" or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve no less.

Thank you for your dedication to the students of Mississippi and your work to ensure all Mississippi students and teachers have the necessary tools and support to be successful.

Sincerely,

LeAnne Robinson,  
Parent of students of the  
Itawamba County School District



January 13, 2021

I would like to make the following comments regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

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

- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them or are not counted in the Acceleration component of the Accountability Model. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, we do not believe national certifications should also be required along with the ACT WorkKeys. I would like to recommend to add the ACT WorkKeys as an indicator of career readiness along **with the completion of a career pathway.**
- I would also like to request **consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program.** For example, A Silver Level or above on the WorkKeys certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

Sincerely,

Tracy Dearing, Ed.S  
CTE Director, Quitman School District

Clarke County Career and Technology Center  
910 N. Archusa Ave.  
Quitman, MS 39355  
601-776-5219

## Angela Kitchens

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**From:** Chism, Chris <cchism@pearlk12.com>  
**Sent:** Wednesday, January 13, 2021 11:00 AM  
**To:** Accreditation Shared  
**Subject:** Workkeys

Mr. Burrow,

Good evening.

First, I want to thank you all for considering Workkeys to be used in our current accountability model. This test is important for students hoping to step into a job right out of high school. However, I do have a couple of comments about proposed inclusion of this test within our current accountability model.

#1 The Accountability Task Force recommended the silver score stand alone as a measure of career readiness on the Workkeys test. The task force did not recommend attaching any other items to the aforementioned score. While an industry certification is certainly a goal for students, not all paths have a certification that can be reached while in high school. Along these same lines, we may have students that choose an academic path that does not allow for CTE classes. Using Workkeys universally would allow both students and schools some flexibility with their choices.

#2 The current proposed change could potentially cause an equity issue with many school districts. Access to CTE programs from district to district can vary widely. The Workkeys test itself is universal.

#3 The sentence included in the press release states, "The Commission on School Accreditation on Dec. 10 approved unanimously a proposal from the Mississippi Department of Education to require a WorkKeys Silver level student performance and completion of an industry certification or pathway to ensure comparable rigor between ACT and ACT WorkKeys in the accountability model."

The inference here is Workkeys is not comparable with regard to rigor to the ACT. While I somewhat agree with that statement, I disagree with the way comparability is being applied in this particular case. The ACT is measuring college readiness, while Workkeys measures career readiness. We are comparing apples to oranges when attempting to parallel the "rigor" of both of these tests in this case. While making the argument that Workkeys is not as rigorous as the ACT academically, one could make a similar argument in reverse. Workkeys measures the likelihood of success in business in industry based on both hard and soft skills. The ACT is not built to measure these items. Ultimately, rigor comparisons are null and void when the desired testing outcomes are divergent.

If our ultimate goal is to either send students into the work force or to the college of his or her choosing, both tests should hold equal weight without any other attachments and/or requirements.

Thanks,

*Chris Chism*

# Pearl River County School District

1000 Highway 10  
Pearl River, MS 38874  
(662) 235-1111

1000 Highway 10  
Pearl River, MS 38874

1000 Highway 10  
Pearl River, MS 38874

January 12, 2021

Mr. Alan Burrow  
District and School Performance  
Mississippi Department of Education  
[accreditation@mdek12.org](mailto:accreditation@mdek12.org)

Dear Mr. Burrow:

This public comment is submitted on behalf of the Pearl River County School District regarding the addition of WorkKeys assessment as an indicator of success on the College and Career Readiness (CCR) component of the statewide accountability model.

The Pearl River County School District disagrees with MDE's recommendation that requires a student meet the Silver benchmark on WorkKeys and successfully complete an industry certification or career pathway in order to be included in the CCR component. Instead, we agree with the recommendation from the Accountability Task Force to allow a score at the Silver benchmark or higher on WorkKeys assessment to be considered successful as a stand alone metric and be included in the numerator for mathematics and/or English/reading components of the CCR in lieu of the ACT college prep benchmark requirement for the purposes the state accountability model.

MDE's recommendation requires career track students meet more requirements than college prep students. In order for the CCR component of the accountability model to truly assess career readiness, a career readiness indicator must be used. WorkKeys is an effective indicator of career readiness; however, career track students should not have to meet both the college prep benchmark and the career readiness benchmark. Students should be able meet career readiness benchmark without being required to meet the college prep benchmark. MDE's suggestion that career skills are inferior to college prep skills is unfair and damaging to our students and our education system in Mississippi.

Thank you for allowing us the opportunity to express our feedback on this change.

Sincerely,

  
Alan Lumpkin



**Angela Kitchens**

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**From:** Timmy Fanguy <tfanguy@scott.k12.ms.us>  
**Sent:** Wednesday, January 13, 2021 1:03 PM  
**To:** Accreditation Shared  
**Subject:** CCR WorkKeys Recommendation  
**Attachments:** MASCTA WorkKeys Letter to Members.pdf

Mr Burrow,

I am in full agreement with the attached letter submitted by Mrs. Kelly. Please consider giving CTE education some representation on our State accountability model.

--

**Thank You and Have a Great Day,**

**Timmy P. Fanguy, Director**  
Forest-Scott County Career & Technology Center  
521 Cleveland Street Forest, MS 39074  
Phone: 601-469-2913  
Cell: 601-622-3106  
Fax: 601-469-2917



*The Forest-Scott County Career and Technology Center does not discriminate on the basis of race, color, religion, national origin, sex, age, or disability in the provision of educational programs and services or employment opportunities and benefits.*





**Mississippi Association of Secondary Career & Technical  
Administrators**

**A Division of Mississippi ACTE**

**TO:** MASCTA Members

**FROM:** Suzanne Kelly, MASCTA President  
Lamar County Center for Technical Education  
suzanne.kelly@lamarcountyschools.org  
601-794-8298 ext. 1503

**SUBJECT:** **WorkKeys addition to College and Career Readiness Indicator**

**DATE:** January 12, 2021

*Below is a letter created by the MASCTA Board of Directors in regards to the APA process by MDE to revise the business rules of the Mississippi Statewide Accountability System to include the ACT WorkKeys assessment in the measure of student performance as part of the College- and Career-Readiness component of the Mississippi Statewide Accountability System. **We encourage all CTE Directors to also submit comments as part of the APA process.** Comments should be submitted to Alan Burrow at [accreditation@model.ms.org](mailto:accreditation@model.ms.org). **The deadline for comments is 5 p.m. on January 14th.***

The Mississippi Association of Secondary Career & Technical Administrators (MASCTA) Board of Directors respectfully submits the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

The MASCTA board would like to make the following comments.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and **should therefore be considered the strongest indicator** of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, we do not believe national certifications should also be required along with the ACT WorkKeys. However, the MASCTA Board of Directors strongly supports the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along **with the completion of a career pathway.**

- Finally, we request **consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program.** For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

The MASCTA Board of Directors strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. We believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).

Thank you for taking the time to read our comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-794-8298 ext. 1503.

Sincerely,



Suzanne Kelly, M.Ed.  
CTE Director, Lamar County Schools  
MASCTA President



**Amy Johnson, Director**  
1280 College View Drive, Tupelo, Mississippi 38804  
P.O. Box 832, Tupelo Mississippi 38802-0832  
(662) 841-9144 • Fax (662) 680-6012

January 13, 2021

To Whom It May Concern:

I am writing this letter to show support for the recommendation of adding the ACT WorkKeys assessment along with completing a career pathway or acquiring an industry certification to the Mississippi Statewide Accountability System.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest paid level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe that national certifications should be required along with the ACT WorkKeys but considered separately.
- ACT WorkKeys should be considered along with the completion of a career pathway as an indicator of career readiness.
- Also, please consider adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program. For example, a Silver Level or above on the WorkKeys assessment could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to the WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

Adding the additional weight to the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. This would be comparable to the added weight that is already calculated in the acceleration component for AP courses.

Thank you for taking the time to read my suggestions and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 662.841.9144.

Thank you,

A handwritten signature in cursive script that reads "Amy Johnson".

Amy Johnson, Ed. S., NBCT  
Career and Technical Director

January 13, 2021

Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mdek12.org](mailto:accreditation@mdek12.org)

Dear Mr. Burrow,

Regarding the measures of the career readiness debate, I believe that the accountability model needs to be two-fold. First, the model needs to include an ACT WorkKeys score of silver or higher. This shows a basic mastery in workplace math, reading comprehension, and data analysis.

Second, and most important, the accountability model needs to include a requirement that students complete a two-year career and technical course. Not only can these courses help students explore and define a career path or field of interest, they teach students soft skills that are highly regarded in the job market. Skills such as professional communication, work ethic, leadership, collaboration, critical thinking and having a positive attitude are developed over time in the classroom. Also, a student that has successfully completed a two-year course is going to have a boosted confidence level going into his or her field that non-completers will lack.

I strongly believe that WorkKeys Silver, along with a successful completion of a two-year CTE program, would be a strong indicator of student success for career readiness in the accountability model.

Thank you for all your hard work to ensure students and teachers in Mississippi have the resources and support they need.

Sincerely,

Jonathan Hester  
Business, Marketing & Finance Instructor  
Itawamba Career & Technical Center  
200 Career Tech Rd.  
Fulton, MS 38843  
(662)862-3137

## Angela Kitchens

---

**From:** Logan B Dodds <lboddds@itawambacountyschools.com>  
**Sent:** Wednesday, January 13, 2021 2:36 PM  
**To:** Accreditation Shared  
**Subject:** Accountability Model comments

Logan Dodds  
Construction  
1600 W. Highway 101, Suite 100  
Central, Tennessee 37031  
202-399-8300  
303-909-8300  
www.itawambacounty.com



I feel that it is better for the students and workforce that the students must make silver on the work keys and be a 2nd year completer of a CTE program. With the students having both it shows that they have the knowledge and skill set needed to help positively impact their futures and the workforce. With these two requirements, it will give the state's Accountability Model a true indication of how College and Career Ready the students truly are.

--  
**Logan Dodds**  
Itawamba County Career And Technical Center  
Construction Technology Instructor

Dusty Thompson  
Welding

Phone: 662-867-3137 Fax: 662-862-3138  
Email: [dthompson@itawambacountyschools.com](mailto:dthompson@itawambacountyschools.com)

200 Vo Tech Road  
Fulton, MS 38843

website: [itawambacountyschools.com/ivc](http://itawambacountyschools.com/ivc)



*Serving All Itawamba County Schools*



Jan. 13, 2021

Mr. Alan Burrow, Executive Director

District and School Performance

Mississippi Department of Education

[accreditation@mdek12.org](mailto:accreditation@mdek12.org)

Dear Mr. Borrow,

Including the WorkKeys assessment in the accountability model is a great idea, but my opinion is that MDE should also require a 2-year high school career & technical course completion along with the Silver level of the WorkKeys assessment. A few reasons why:

- Career & technical students have a higher employment rate
- Hands on Training
- Relevant skills in less time
- The student transitions to their career choice directly
- Smaller classes for more one on one learning
- The future for trades is bright
- The chances of Graduating are high
- Career Services

This requirement of a Silver level on the WorkKeys assessment and also a 2-year high school career & technical course completion will truly measure that students are college and career ready.

Dusty Thompson,

Welding Instructor

Carrie Grubbs  
Director

Phone: 662-862-3137 Fax: 662-862-3138  
Email: cgrubbs@itawambacounty schools.com

200 Vo Tech Road  
Fulton, MS 38843

website: itawambacounty schools.com/ctc



*Serving All Itawamba County Schools*

January 13, 2021

Dear Mr. Burrow,

One of the most important indicators of college- and career-readiness within the accountability model should be the completion of a two-year CTE course as well as a completed ACT WorkKeys certification at the Silver level. Career and Technical Education prepares high school students for successful careers in a job market that continues to grow. The demand for qualified skilled workers has increased significantly in the past ten years. And it is important to note that these jobs/careers are in no way a second rate alternative to the traditional two-year and four-year degree requirements of some professions.

The ACT WorkKeys test is based on industry standards and is further validation of the importance of career and technical education courses in the modern education system. The completion of these courses gives the students actual working knowledge that will be immediately useful on the job. Many students who don't do as well in traditional education classes excel in career and technical education. Whether it is from the more hands on approach or the various skills offered from career technical classes, many students are able to discover a true talent or interest which helps to encourage and motivate them in obtaining that high school diploma. Furthermore, they feel better prepared to pursue a career or college education. The ACT WorkKeys Silver is a significant indicator but no more so than the skills students learn through the completion of two-year CTE programs which make them truly competitive in today's job market.

Sincerely,

Sherry Lentz, Secretary

## Angela Kitchens

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**From:** Celeste ScalesWood <ocscales@gmail.com>  
**Sent:** Wednesday, January 13, 2021 2:50 PM  
**To:** Accreditation Shared  
**Subject:** MS Accountability Model

Dear Mr. Burrow:

I am writing to express my hope that the Mississippi Board of Education will adopt the recommendation of the Accountability Task Force to modify the business rules to allow a score at the Silver level on the WorkKeys assessment to be considered successful as a stand-alone measure instead of the ACT college prep benchmark for purposes of the College- and Career-Readiness component of the State Accountability Model rather than the MDE's recommendation.

Thank you for your work on behalf of Mississippi students and teachers so that they have the resources and support they need to be successful. It is important to all Mississippians.

Regards,

Celeste Scales  
Oktober County, Mississippi  
[ocscales@gmail.com](mailto:ocscales@gmail.com)



Jeremy Jones  
Collision Repair

Phone: 662-862-3137 Fax: 662-862-3138  
Email: [jejones-lindsey@itawambacountyschools.com](mailto:jejones-lindsey@itawambacountyschools.com)

200 Career Technical Drive  
Fulton, MS 38843  
website: [itawambacountyschools.com](http://itawambacountyschools.com)



*Serving All Itawamba County Schools*

**Please take a second to review these comments regarding the addition of the WorkKeys assessment as an indicator of success in the CCR Component of the State Accountability Model:**

- **I believe that adding the ACT Work Keys test as a national assessment that measures foundational skills required for success in the workplace is a good idea.**
- **I strongly agree that the WorkKeys Assessment is a good addition along with the completion of a (2) year Career and Technical Course.**
- **With both of these requirements we can ensure that students have not only the knowledge but the hands on skill to be industry ready upon completion.**
- **These requirements also give us confidence as instructors and as industry leaders that we are sending our students into the industry with the proper knowledge and hands on training. Also, this gives an employer confidence to hire our students having both the Silver level on WorkKeys and the completion of a technical course.**

**I feel that if we implement this with the combination of WorkKeys and completion of a career pathway, it will give students the training needed to be college and career ready.**

*Jeremy Jones*

**Collision Instructor**



**Hattiesburg Public School District**

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January 12, 2021

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

Dear Mr. Burrow:

I am writing to share my comments with the State Board of Education regarding the addition of the WorkKeys assessment as an indicator in the College and Career Readiness (CCR) component of Mississippi's State Accountability Model. We have reservations with the Mississippi Department of Education's recommendation but support the Accountability Task Force proposal.

The Accountability Task Force recommended students scoring at the Silver level or higher on the WorkKeys assessment without any qualifiers. The Mississippi Department of Education recommendation was modified with qualifiers to complete a two-year career pathway or attainment of a recognized industry certification. To add this qualifier is the equivalent of adding a qualifier to the ACT, which is in the current accountability model, such as meeting the IHL entry requirements or on a college diploma track.

The ACT is a college-readiness exam (achievement test) which measures what a student has learned in school and is a predictor of college success. On the other hand, ACT WorkKeys measures a range of both soft and hard skills, which are crucial to success in the workplace across industries. Successful completion of WorkKeys, without an industry certification or completion of a two-year program, can lead to a National Career Readiness Certification, which tens of thousands of employers recognize. The end goal should be student success and producing an ACT Workforce Ready Community for Mississippi.

Thank you for your time and consideration.

Sincerely,

Robert Williams, Ph.D.  
Superintendent

301 Mamie Street - Hattiesburg, MS 39401 - P. O. Box 1569 - Hattiesburg, MS 39403-1569  
Phone (601) 582-5078 - Fax (601) 583-7339

*"Today's Learners, Tomorrow's Leaders!"*



Marion County  
CARL LOFTIN  
Career & Technology Center

January 13, 2021

Dear Ladies and Gentleman:

As instructor of the Marion County CTC I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway .
- Finally, I request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program . For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As a CTE Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-736-6095.

Sincerely,

*Anna Morris*

Anna Morris  
Engineering and Robotics Instructor, Marion County Carl Loftin CTC

601-736-7384  
601-736-2077

1140 Highway 13 South • Columbia, MS 39429



**Marion County**  
C A R L L O F T I N  
**Career & Technology Center**

January 13, 2021

To Whom it May Concern

As an instructor at the Marion County CTC I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MOE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway .
- Finally, I request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program . For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As a CTE instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-736-6095.

Sincerely,

Katie Albritton, RN

Health Science 1, Marion County Carl Loftin CTC

601-736-7385  
601-731-2077

1140 Highway 13 South | Columbia, MS 39429



**Marion County**  
CARL LOFTIN  
**Career & Technology Center**

February 13, 2021

Dear Ladies and Gentlemen,

As automatic Instructional Director at the Marion County CTC, I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys as a secondary indicator of career readiness to the Accountability Model. I have fully completed an 11-hour, 1-day certification of career pathway recognized by the Mississippi Department of Education:

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certification associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model. Therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.
- Finally, I request consideration for adding additional weight to the numerator of the College and Career-Readiness indicator for any student who completes a career pathway program. For example, a Silver Level or above on the WorkKey certification could count as 1 on the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with special level career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As a CTE instructor, I strongly believe the request to add additional weight to the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.1 on page 16 in the Mississippi Public School Accountability Standard). I thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-699-0626.

Sincerely,

Kade Lear  
Carl Loftin, Instructional Technology Instructor



Marion County  
CARL LOFTIN  
Career & Technology Center

January 13, 2021

To Whom It May Concern

As an instructor at the Marion County CTC, I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MOE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SSE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway .
- Finally, I request consideration for adding additional weight to the numerator of the College- and Career- Readiness Indicator for any student who completes a career pathway program . For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a GTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As CTE instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-736-6095.

Sincerely,

Shari C. Bryant, RN  
CTE Instructor, Marion County Carl Loftin CTC

GOI-735-7385

GOI-731-2077

1140 Hightway 13 South | Columbia, MS 39429

Alan Burrow at [accreditation@mdek12.org](mailto:accreditation@mdek12.org).

January 13, 2021

Dear Ladies and Gentleman:

As Student Services Coordinator of Marion County CTC, I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.
- Finally, I request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program. For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As Student Services Coordinator, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-736-6095.

Sincerely,

Kimberly Rawls  
Student Services Coordinator, Marion County Carl Loftin CTC



Marion County  
CARL LOFTIN  
Career & Technology Center

January 13, 2021

Dear Ladies and Gentlemen:

As Welding teacher at the Marion County CTC I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.
- Finally, I request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program. For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As CTE Teacher, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-736-7385..

Sin

Robert Boone  
CTE Teacher, Marion County Carl Loftin CTC

GOI-73G-7385  
GOI-731-2077

1140 Highway 13 South | Columbia, MS 39429





Marion County  
CARL LOFTIN  
Energy & Technology Center

January 13, 2021

To Whom It May Concern:

As an instructor at the Marion County CTC I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a GTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several GTE pathway programs recognized by MOE offer nationally recognized certifications; however, there are some GTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway .
- Finally, I request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program . For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a GTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As a career and technical instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-736-6095.

Sincerely,

Heather Smith  
Digital Media Instructor, Marion County Carl Loftin CTC\

501-73G-7385  
501-731-2077

1140 Hi1Jhway 13 Sout 1 | Columbia, MS 39429



Marion County  
CARL LOFTIN  
Career & Technology Center

January 13, 2021

Dear Ladies and Gentleman

As a CTE Instructor of the Marion County CTC I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.

Several CTE pathway programs recognized by MOE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway .

Finally, I request consideration for adding additional weight to the numerator of the College- and Career-Readiness indicator for any student who completes a career pathway program . For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As a CTE Instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-735-8095..

Sincerely,

Dana H. Smith  
Culinary Arts Instructor  
Carl Loftin Career and Technology Center  
1140 Highway 13 South

GOI-735-7385

GOI-731- 2077

1140 Highway 13 South | Columbia, MS 39429



January 13, 2021

Dear Ladies and Gentlemen:

As an instructor at the Marion County CTC I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway .
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As a CTE instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at (601) 736-6095.

Sincerely,

Debbie Brumfield  
WBL Instructor

601-736-7115  
601-731-2077  
1140 Highway 11 South | Columbus, MS 39423



**Marion County**  
C A R L L O F T I N  
Career & Technology Center

January 13, 2021

To Whom It May Concern:

As an instructor at the Marion County CTC I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MOE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway .
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As a career and technical instructor, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-736-6095.

Sincerely,

Amy Baughman  
Teacher Academy Instructor, Marion County Carl Loftin CTC

501-735-7385  
501-731-2077

1140 Highway 13 South-1 | Columbia, MS 39429



## MISSISSIPPI PROFESSIONAL EDUCATORS

222 N. President Street, Suite 100 • P.O. Box 22560 • Jackson, MS 39225-2560  
601.355.5517 • 800.523.0269 • FAX 601.355.5519 • [www.mpe.org](http://www.mpe.org)

January 13, 2021

Mr. Alan Burrow  
Office of District and School Performance  
Mississippi Department of Education  
[Accreditation@mdek12.org](mailto:Accreditation@mdek12.org)

Dear Mr. Burrow:

The Mississippi Professional Educators (MPE) is pleased to submit these comments regarding the inclusion of ACT WorkKeys as an indicator in the College- and Career-Readiness component of Mississippi's State Accountability Model. MPE supports the Accountability Task Force's recommendation that the Silver National Career Readiness Certificate (NCRC) on ACT WorkKeys be the sole indicator of career readiness.

The Accountability Task Force, which is comprised of licensed practitioners from throughout our state, held multiple, lengthy discussions over several months regarding the inclusion of ACT WorkKeys in the model. During the task force's November meeting, MDE staff proposed that a Silver NCRC on WorkKeys and a recognized industry certification or career pathway be required as an indicator of career readiness. The Accountability Task Force did not accept this proposal and recommended that the Silver NCRC be the sole indicator of career readiness. MDE staff then urged the Commission on Accreditation to adopt the staff proposal rather than the task force's proposal. MDE staff's reference to the Commission on Accreditation voting unanimously on December 10 to support the staff recommendation of an additional indicator is misleading and fails to represent actual discussions and considerations of the Commission during which members expressed significant concerns regarding the MDE staff proposal.

There are no additional qualifiers for the ACT, yet MDE staff's recommendation requires additional qualifiers of an industry certification or completion of a two-year career pathway for students who choose to enter the workforce rather than attend college when they finish high school. We should not place additional qualifiers on a group of students simply because they are headed to a career rather than to higher education, as doing so implies that career skills are not as important as college skills.

MDE staff's recommendation ignores the recommendation of practitioners and is reminiscent of the staff's efforts in 2019 and 2020 to continue the U.S. History assessment. Although the Student Testing Task Force and the Commission on School Accreditation recommended elimination of the assessment, MDE staff recommended continuation of the assessment and the State Board upheld this recommendation. Mississippi practitioners question the purpose and validity of task forces when MDE ultimately develops and drives recommendations while disregarding the time and expertise of practitioners.

MPE supports the recommendation of the Accountability Task Force that the Silver NCRC be the sole indicator of career readiness. We encourage the State Board to adopt the recommendation of the Accountability Task Force which does not require the additional qualifiers.

Sincerely,

Devin Walsh  
President

Kelly Riley  
Executive Director

## ITAWAMBA ATTENDANCE CENTER

488 Little Indian Rd.  
Fulton, MS 38843

Phone: 662-862-4641  
**Dr. Terry Harbin, Principal**

Fax: 662-862-4396  
**Martin Davis, Assistant Principal**  
**Ashley Greer, Assistant Principal**

Jan. 13, 2021

Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mddek12.org](mailto:accreditation@mddek12.org)

Dear Mr. Burrow,

Every student is required to meet the benchmark for college readiness to be considered "successful." However, all students do not learn in the same way. Expecting them to learn the same is like asking a room full of adults to fit into the same size jeans. It's not going to happen.

Vocational learning offers a variety of opportunities for student to learn in a different style. For this reason, I feel that the WorkKeys assessment at a Silver level, paired with the successful completion of a two year CTE program with a grade of 70 or higher, would greatly benefit many of our students.

The ongoing pandemic has opened our eyes to a renewed need for CTE courses. Our students who are interested need to be prepared for careers that do not require a college degree. CTE has the opportunity to play a great role in this type education as we navigate new waters. We need to offer CTE courses in which students are interested, not just the ones that offer industry certification. You have the opportunity to promote CTE courses and students will have the opportunity to successfully complete a two-year program and earn vital skills.

I strongly believe that WorkKeys Silver, along with successful completion of a two year CTE program with a grade of 70 or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve no less.

Thank you for your dedication to the students of Mississippi and your work to ensure all Mississippi students and teachers have the necessary tools and support to be successful.

Sincerely,

Terry Harbin, Ph.D.

**Angela Kitchens**

---

**From:** Lundy Brantley <lbrantley@neshobacentral.com>  
**Sent:** Wednesday, January 13, 2021 4:27 PM  
**To:** Accreditation Shared; Alan Burrow; Paula Vanderford  
**Subject:** Public Comment/WorkKeys

We are for WorkKeys Silver level in the accountability model.  
We are not for WorkKeys Plus anything else.  
Some districts do not have CTE/Industry certifications therefore is not equitable.  
Currently we do not require ACT plus another avenue.

We believe the fair and equitable solution is to use Workkeys as a standalone just as the ACT is currently.

..  
Dr. Lundy Brantley  
Superintendent  
Neshoba County School District





**Pass Christian School District**  
Office of the Superintendent & Board of Trustees  
*Committed to Excellence*

January 13, 2021

Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mdek12.org](mailto:accreditation@mdek12.org)

Dear Mr. Burrow,

The Pass Christian Public School District appreciates the opportunity to express our opinion on the Technical Advisory Committee's recommendation and the Mississippi Department of Education's support thereof as related to the following:

*To revise Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2020 specifically the business rules of the Mississippi Statewide Accountability System, Section 25, College- and Career-Readiness, regarding the inclusion of ACT WorkKeys in performance measures [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]*

Please accept these comments on behalf of the Pass Christian Public School District indicating our disagreement to the proposal to amend the business rules of the Mississippi Statewide Accountability System by requiring a Silver National Career Readiness Certificate (NCRC) on ACT WorkKeys in conjunction with a recognized industry certification or career pathway as an indication of career readiness in the College- and Career-Readiness (CCR) component.

Our main points are as follows:

1. The work of the Accountability Task Force (ATF) leading up to and including their recommendation to the Mississippi Department of Education "that the Silver NCRC serve as the sole indicator of career readiness" is valid and represents a great deal of research, examination, consideration, and potential benefit to the students and future workforce of the State of Mississippi.
2. The importance of including the Silver NCRC as the sole indicator of career readiness must be considered, just as the current CCR component requires students to only meet the ACT benchmarks in English and Math as the sole indicator of college readiness. The requirement for college readiness does not include another 'hoop' through which students must jump. Therefore, the well-vetted and highly respected Silver NCRC WorkKeys benchmark requirement for the Career Readiness piece is adequate, also. Let's not place our career/work-oriented students at an additional disadvantage.

Dr. Carla J. Evers, Superintendent of Schools

6457 King Of The Hill Rd. • Pass Christian, MS 39571 • Office: 228-255-6200 • Email: [cevers@pcsd.k12.ms.us](mailto:cevers@pcsd.k12.ms.us)



3. The proposed requirement to include a "recognized industry certification" or "career pathway" is vague, ambiguous, undefined, requires mandatory additional outlay of funding by school districts, and will serve as a roadblock to student success rather than as a student accomplishment. Additionally, it would place small school districts at a disadvantage as they may not have or have access to full CTE programs to meet the additional requirements.
4. An impressive sixty-seven percent (67%) of Mississippi counties have successfully completed the arduous requirements to be certified "Work Ready Communities." Following graduation, all students who have obtained a Silver or better WorkKeys NCRC are able to apply for jobs with thousands of partnering businesses and industries in Mississippi and have the distinct advantage of holding a nationally recognized work-ready certificate. Please note that there is no extra or additional requirement. The Silver or better NCRC is a stand-alone advantage, just as it should be when it comes to the Mississippi College and Career Readiness Accountability Standards.

As a school district, community, and state, we are counting on education leaders in the great state of Mississippi to make decisions that will continue to propel our students in the right direction regarding college and career readiness and opportunities to be most successful in the future. We implore you to put provisions in place to allow our students, schools, and districts to shine equally as bright as their counterparts while competing on a level playing field.

Thank you for your time and consideration. Please do not hesitate to contact us for additional information, if needed.

Sincerely,



Carla J. Evers, PhD

Cc Mrs. Patty Cooper, Chief Academic Officer  
Dr. Robyn Killebrew, Assistant Curriculum Director/CTE Contact  
Mr. Boyd West, Principal – Pass Christian High School  
Mrs. Melissa Mannion, Counselor – Pass Christian High School  
File

Dr. Carla J. Evers, Superintendent of Schools  
6457 Kille DeLisle Rd. • Pass Christian, MS 39571 • Office: 228.255.6260 • Email: [cevers@pc.k12.ms.us](mailto:cevers@pc.k12.ms.us)

## **Angela Kitchens**

---

**From:** Tawanna Thornton <Tawanna.Thornton@lawcosd.org>  
**Sent:** Wednesday, January 13, 2021 5:29 PM  
**To:** Accreditation Shared  
**Subject:** Revision of business rules Section 25

Dear Board Members;

I am writing to express my concern with the revisions proposed to Section 25 of the business rules of the Mississippi Statewide Accountability system.

First, I applaud you for your consideration of including the ACT WorkKeys in the scores for College and Career Readiness. I think this inclusion alone would be beneficial to all schools and districts. However, I feel that pairing the requirement of Silver level on the WorkKeys with the requirement that students successfully complete an industry certification or career pathway is an unfair requirement for smaller schools and districts. While this requirement will benefit districts who have numerous certification programs and who have enough faculty to offer various courses throughout the day, for those of us in smaller districts, our students often must make choices between CTE classes, finishing the second year of CTE programs, and taking advanced classes. This is because often our advanced classes or our CTE courses are often only offered once during the school day or school year due to having a limited number of faculty. Therefore, students often cannot participate in both. In including this paired requirement there will be many students who can score at high levels on the WorkKeys but who still cannot be counted as College and Career ready because they had to make choices regarding which classes they could complete.

Thank you for your time and consideration and your service to students throughout our state.

**Tawanna C. Thornton**  
Lawrence County High School Principal

*Fostering Growth Through Education*

**Angela Kitchens**

---

**From:** lisa long <llong89@hotmail.com>  
**Sent:** Wednesday, January 13, 2021 8:14 PM  
**To:** Accreditation Shared  
**Subject:** Student Career-Readiness

Dear Mr. Burrow,

I am writing to express my support of the Accountability Task Force recommendation that ONLY the stand-alone Silver level benchmark on WorkKeys be used as the indicator of student career-readiness for purposes of the Statewide Accountability Model.

I oppose the addition of an industry certification to be counted as successful in the accountability model.

Thank you for your attention to this matter.

Sincerely yours,

Lisa Long  
Starkville, MS



Serving All Itawamba County Schools



### Work-Based Learning

Deana Patterson, NBCT, Ed.S.  
Work-Based Learning Coordinator  
200 Career Technical Dr.  
Fulton, MS 38843  
Phone: 662-862-3137  
Fax: 662-862-3138  
dpatterson@itawambacounty.k12.ms.us

January 13, 2021

Dear Mr. Burrow,

My name is Deana Patterson and I am the Work-Based Learning Coordinator for the Itawamba Career and Technical Center. I am writing to provide public comment on the Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2020 specifically the business rules of the Mississippi Statewide Accountability System, Section 25, College - and Career - Readiness, regarding the inclusion of ACT WorkKeys in performance measures.

I do not agree with the Inclusion of the ACT WorkKeys (Silver or Higher) in performance measures as a stand-alone indicator. I do not agree with the Inclusion of the ACT WorkKeys (Silver or Higher) and achievement of a national certification.

I do agree with the Inclusion of the ACT WorkKeys (Silver or Higher) AND completion of a Two - Year Career and Technical Education Pathway in performance measures of the Mississippi Statewide Accountability System.

My decision is based on the following:

1. Achievement of Silver or Higher on the ACT WorkKeys:
  - a. Provides students with the opportunity to achieve the National Career Readiness Certificate (NCRC).
  - b. Does not demonstrate student skill ability, only the ability as a test taker.
2. Completion of a Two-Year Career and Technical Education Pathway provides students with:
  - a. Curriculum based upon 21st Century, ISTE, MSCCRS, and pathway specific standards which have been meticulously designed by practitioners from the fields of secondary/post secondary education, business, industry, and community leaders.
  - b. Industry Recognized, Specialized pathway skills
  - c. Essential, industry standard safety skills
  - d. In-field networking opportunities
  - e. Soft skills development
  - f. Work-Based learning opportunities
  - g. Opportunity to learn the importance of attendance, punctuality, and discipline BEFORE damaging their reputation in the world of work.
  - h. Ability to acquire life-long, transferable skills



itawambacounty.k12.ms.us

3. Requirement of National Certification:

- a. National Certification is not currently available for each Career and Technical Education Pathway.
- b. If National Certification is an accountability requirement, it will not only limit opportunities for students but could also become a violation of FAPE.

The inclusion of ACT WorkKeys (Silver or Higher) AND completion of a Two - Year Career and Technical Education Pathway in performance measures of the Mississippi Statewide Accountability System will provide the students of Mississippi with the opportunity to become college and career ready.

Thank you for considering my comments. Please feel free to contact me at 662-862-3137 or [dpatterson@itawamba-county-schools.com](mailto:dpatterson@itawamba-county-schools.com) for further clarification.

Sincerely,



Deana Patterson, NBCT, Ed.S.  
Itawamba Career and Technical Center  
Work-Based Learning Coordinator



Marion County  
**C A R L L O F T I N**  
 Career & Technology Center

Janice H. Sears, PhD  
 Marion County Carl Loftin Career & Technology Center  
 1140 Hwy 13 South  
 Columbia, MS 39429

January 13, 2021

Dear Ladies and Gentleman:

As director of the Marion County CTC I respectfully submit the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, I do not believe national certifications should also be required along with the ACT WorkKeys. However, I strongly support the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway .
- Finally, I request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program . For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

As CTE Director, I strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. I believe this request is comparable to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards). Thank you for taking the time to read my comments and take into consideration true and accurate measures of Career Readiness. If you have any questions or would like to discuss these recommendations further, please contact me at 601-736-7385.

Sincerely,

Janice H. Sears, PhD  
 CTE Director, Marion County Carl Loftin CTC

Janice H. Sears, PhD

601 736 7185  
 601 441 9894  
 601 736 7077

[js@seamank12.org](mailto:js@seamank12.org)

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# MANTACHIE **M** MUSTANGS

**Mantachie Attendance Center**  
**310 Mustang Drive/P.O. 38**  
**Mantachie, MS 38855**  
662-282-4276 phone  
662-282-4270 fax

**Millie A. Wood**  
**MHS Principal**

**John Tigner**  
**Assistant Principal**

January 14, 2021

Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mdek12.org](mailto:accreditation@mdek12.org)

Dear Mr. Burrow,

Good morning, my name is Millie Wood and I am the principal at Mantachie High School in the Itawamba County School District in north Mississippi. Please accept these public comments submitted regarding the addition of the WorkKeys assessment as an indicator of success in the College-and Career- Readiness (CCR) Component of the State Accountability Model.

As it stands, every student, even those students who are not college bound, are required to meet the benchmark for college readiness to be considered "successful." This is the reason industry leaders, education leaders, and elected officials have called for the addition of a true indicator to measure career readiness which will assess the work school districts have done to provide students who are on a career track with skills needed to be successful. MDE is advocating for WorkKeys Silver and Industry Certification in order to meet this requirement. However, it is my belief the WorkKeys assessment at a Silver level, paired with the successful completion of a two year CTE program with a grade of "C" or higher, would accomplish this task.

Itawamba County currently offers nine CTE programs with only four providing the opportunity for Industry Certification. This school year, we had 78 students who were WorkKeys tested. Out of those students, 58% scored Silver or higher. However, only 46% of the students tested have the opportunity to earn industry certification. Requiring this certification would not be fair to the many students who complete two years of our other programs which do not currently offer the opportunity for certification.

At Mantachie High School, we offer the only Meats program in the state of Mississippi. This popular program is very successful and we traditionally have a waiting list for students wanting to enroll. The demand is often greater than can be supplied. Do we advocate telling students not to enroll in this class in order to take a class that offers certification? In addition, currently the Health Sciences program will implement industry certification this year but we do not know if it will be included in accountability. The pandemic has shown the demand for students willing

to go into the medical field. It is my strong belief that it is not fair to require WorkKeys Silver and Industry Certification when so many CTE programs in Mississippi do not currently offer that option.

Our country has been through a major shift due to the ongoing pandemic. Our eyes have been opened to a renewed need for CTE courses and preparing interested students for careers that do not require a college degree or higher. CTE has the opportunity to play a great role in education as we navigate new waters. We need to offer CTE courses in which students are interested. We do not need to only adhere to ones that offer industry certification. You have the opportunity to promote CTE courses and students having the opportunity to successfully complete a two-year program and earn vital skills needed.

I strongly adhere to the belief that WorkKeys Silver, along with successful completion of a two year CTE program with a grade of "C" or higher, would be a strong indicator of student success for Career Readiness. It is my hope that the Mississippi Board of Education will look at this objectively and truly measure Career Readiness by a fair standard. Our students deserve no less.

Thank you for your dedication to the students of Mississippi and your work to ensure all Mississippi students and teachers have the necessary tools and support to be successful.

Sincerely,

*Millie Wood*

Millie Wood  
Principal, Mantachie High School  
Itawamba County School District



## HANCOCK COUNTY CAREER TECHNICAL CENTER

7180 Stennis Airport Road  
Kiln, MS 39556  
Off. cc (228) 467-3568  
Fax: (228) 466-4944

Chad Davis, Ph.D.  
Career Technical Director  
Chad.Davis@hancockschools.net

January 14, 2021

Mr. Alan Burrow  
Mississippi Department of Education  
P.O. Box 771  
Jackson, MS 39205-0771

Dear Mr. Burrow:

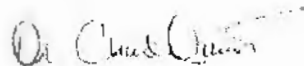
My name is Chad Davis, and I am the director of the Hancock County Career Technical Center. I am writing to comment on the proposed change to the College and Career Readiness Indicator of the Statewide Accountability Model. I am fully supportive of the proposal to include the ACT Work Keys assessment as an indicator of student career readiness.

I do not support the additional proposed requirement of a national certification in the College and Career Readiness Indicator. Currently, not all career technical programs have national certifications associated with them. Additionally, the ACT national standard is being used as the stand-alone benchmark to determine college readiness. It would not be fair or consistent to mandate that students achieve required scores on two assessments (ACT Work Keys assessment and national certification assessment) to determine career readiness. A Silver Level or higher on the ACT Work Keys assessment should sufficiently demonstrate a student's career readiness.

Completion of a two-year CTE program is the strongest indicator of career readiness and should also factor into the College and Career Readiness Indicator. A student who scores a Silver Level or higher on the ACT Work Keys assessment and completes a two-year CTE program is more career ready than one who only scores a Silver Level or higher on the ACT Work Keys assessment. Consideration for adding additional weight to the numerator of the College and Career Readiness Indicator for any student who completes a CTE program and scores a Silver Level or higher on the ACT Work Keys assessment should be strongly considered.

I appreciate your time as the Mississippi Department of Education strives to determine accurate measures of career readiness in the Statewide Accountability Model. If you would like to discuss this input, feel free to contact me at 228-467-3568.

Sincerely,



Chad Davis, Ph.D.  
Director

Carrie Grubbs

Director

Phone: 662-862-3137 Fax: 662-862-3138  
Email: cgrubbs@itawambacounty schools.com

200 Career Technical Drive  
Fulton, MS 38843

website: itawambacounty schools.com



*Serving All Itawamba County Schools*

January 12, 2021

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

Dear Mr. Burrow,

Please accept the following comments regarding the addition of the WorkKeys assessment as an indicator of success in the College and Career Readiness Component of the State Accountability Model.

I recommend that both the Silver level on WorkKeys and the completion of a 2-year career & technical program be recognized as a strong indicator of career readiness. If only a Silver on WorkKeys is recognized, it will not be a true depiction of students that are career ready. These students may only be able to test well or be successful academically. By partnering the WorkKeys Silver level with completion of a 2-year CTE program, the numbers will show a better representation of students that are truly career ready. Students that are completers have not only covered the soft skills required for a career but have also learned job-specific skills needed in the workforce.

I do not feel that national certifications should be attached to WorkKeys in the accountability model. While they are very important, not all programs offer national certifications. Out of the 2<sup>nd</sup> year students that we have WorkKeys tested this school year, only 46% have the opportunity to earn a national certification. By attaching national certifications along with WorkKeys, this could lead to a push from districts to put students in only those programs which is less than half of our CTE programs offered.

Thank you for taking the time to read my comments. If you have any questions or would like to discuss my recommendations further, please contact me at 662-862-3137.

Sincerely,

*Carrie Grubbs*

Carrie Grubbs, CTE Director  
Itawamba County School District



## Forrest County Agricultural High School



215 Old Highway 49 E Brooklyn, MS 39425 (601) 582-4741 Fax (601) 582-9031

**Erik Shows**  
CTE Director

**Melissa Graham**  
CTE Counselor

January 12, 2021

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

Dear Mr. Burrow,

I am writing this letter regarding the addition of the ACT WorkKeys assessment as an indicator to the College and Career Readiness component of the Mississippi accountability model. As it stands right now, all students are held to the college readiness standards whether they are planning on attending college or not. The addition of the ACT WorkKeys assessment to the College and Career Readiness component brings career readiness to light, which is a major step in the right direction.

The ACT WorkKeys test is a great measure of career readiness for students and I am glad that it is being considered as an addition to the College and Career Readiness component of the accountability model. I am requesting that you consider giving additional weight to the numerator of the College and Career Readiness indicator for any student who completes a Career Pathway Program. I recommend that if a student scores silver or above on the ACT WorkKeys assessment then he/she should count as a 1 in the numerator and if that student also completes a career pathway program then he/she should calculate at a higher weight of 1.2 in the numerator.

Thank you for your time and consideration.

Sincerely,

Erik Shows  
CTE Director

**Angela Kitchens**

---

**From:** Jason Gentry <jgentry@neshobacentral.com>  
**Sent:** Thursday, January 14, 2021 10:15 AM  
**To:** Accreditation Shared  
**Subject:** WorkKeys

We are in support of the WorkKeys Silver level in the accountability model. We are not in support of the WorkKeys Plus or anything else being presented. It is not fair since not all school districts have CTE/Industry certifications available for their students so it's not the same for everyone. With the model now, we do not currently use the ACT plus any other measurement. We are in support to use Workkeys by itself, just like we currently use the ACT in the model.

Jason B. Gentry, Ed.S  
Principal  
Neshoba Central High School

**MANTACHIE ELEMENTARY SCHOOL**

311 MUSTANG DRIVE/P.O. BOX 38

MANTACHIE, MS 38855

662-282-7536 phone

662-282-7167 fax

Regina Scribner  
Principal

Cathie Raburn  
Assistant Principal

January 13, 2021

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

Dear Mr. Burrow,

Thank you in advance for taking the time to read my comments in regards to the addition of the WorkKeys assessment as an indicator of success in the College and Career-Readiness (CCR) Component of the State Accountability Model.

I am currently an elementary principal. My background consists of being a former Algebra I teacher so I am familiar with state testing and how some students struggle. I am a parent who had a child involved in a CTE program. I also served as an assistant principal at Mantachie High School for grades 7 - 12 for eight years. At this position I completed schedules for all students which of course consisted of the different pathways including CTE. Being so heavily involved in course registration and scheduling, I worked with so many students who were torn between being a part of our own agricultural programs or the other CTE programs offered through our technical school shared with the district. We have students who want to be involved in some sort of CTE course every year that he or she is in high school. That speaks so much for our programs that are offered through the Itawamba County School District. There are many CTE courses that have waiting lists (as is found in our Meats and Forestry programs) or have a high competitive demand within the district.

The proposed consideration is for WorkKeys Silver, along with successful completion (grade of C or higher) to be considered as a measurable standard for Career Readiness. This would be such a great benefit to those students who put in the time and effort into a course that does not have an option of earning an industry certification. It would be beneficial for these students to have an alternative in the other courses where they have an interest and are still learning a great skill to likely develop into a future career instead of pushing more toward an area with a certification. These programs seem to be overlooked and would be a great asset to be included in the accountability model.

Thank you for all you are doing and your consideration in these uncertain, ever changing times in education.

Sincerely,

Regina Scribner  
Principal  
Mantachie Elementary

We are Committed to Learn, Lead, Work, and Excel. We are one Community. WE ARE MUSTANGS



## Franklin County Career and Technical Center

129 Vo-Tech Lane - P.O. Box 155  
Meadville, MS 39653  
Phone (601) 384-5889  
Fax (601) 384-5578

Terry Moffett  
Director

Brandy Calcote  
Counselor

Porsha Shaw  
Secretary

To: Alan Burrow  
From: Terry Moffett  
Subject: WorkKeys addition to College and Career Readiness Indicator  
Date: January 14, 2021

The Franklin County Career and Technical Center humbly submits the following comments concerning the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

- The strongest indicator of Career-Readiness within the Accountability Model should be Career Pathway training through completion of a CTE program providing Mississippi students with the highest level of career training.
- The CTE Pathway programs that DO NOT currently have national certifications associated with them. SHOULD add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.
- Consider adding weight to the numerator of the College-and Career-Readiness Indicator. The rationalization for this recommendation is that students who complete a career pathway program and graduate high school with specialized career skills will be considerably more career ready than a student who only completed the ACT WorkKeys at the Silver Level. This compares to the additional weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).

Thank you for taking the time to read the recommendations and consider realistic and exact measures of Career Readiness. If you have questions or want to discuss recommendations further, please contact me at 601-384-5889.

Sincerely,

Terry Moffett  
Franklin County Career and Technical Center Director  
Franklin County School District



## *Itawamba Agricultural High School*

*11900 Hwy 25 South • Fulton, MS 38843*

*Rick Mitchell, Principal*

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

Dear Mr. Burrow,

My name is Rick Mitchell and I am the principal of Itawamba Agricultural High School. It is my understanding that MOE is advocating for WorkKeys Silver and an Industry Certification in certain CTE classes to meet the qualifications for a "successful" benchmark for Career Readiness. I would like to advocate for MOE to include all CTE classes in some way. I believe that every CTE program is important. I believe that WorkKeys Silver along with completion of a 2 year CTE program with a grade of "C" or higher would be a fair and comparable indicator of student success for Career Readiness along with the Industry Certification.

I hope at some point MOE can consider this request. Thank you for your time.

Sincerely,

Rick Mitchell  
Principal, IAHS

**Angela Kitchens**

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**From:** Jeff Quin <Jeff.Quin@lawcosd.org>  
**Sent:** Thursday, January 14, 2021 2:15 PM  
**To:** Accreditation Shared  
**Subject:** Business Rules Section 25

Dear Board Members;

I am writing to express my concern with the revisions proposed to Section 25 of the business rules of the Mississippi Statewide Accountability system.

I agree with including the ACT WorkKeys in the scores for College and Career Readiness. I feel it will be beneficial to all schools and districts. However, I feel that pairing the requirement of Silver level on the WorkKeys with the requirement that students successfully complete an industry certification or career pathway is an unfair requirement for smaller schools and districts. While this requirement will benefit districts who have numerous certification programs and who have enough faculty to offer various courses throughout the day, for those of us in smaller districts, our students often must make choices between CTE classes, finishing the second year of CTE programs, and taking advanced classes. This is because often our advanced classes or our CTE courses are often only offered once during the school day or school year due to having a limited number of faculty. Therefore, students often cannot participate in both. In including this paired requirement there will be many students who can score at high levels on the WorkKeys but who still cannot be counted as College and Career ready because they had to make choices regarding which classes they could complete.

Thank you for your time and consideration and your service to students throughout our state.

Dr. Jeff Quin  
Lawrence County Technology and Career Center Director  
686 Smith Lane  
Monticello, MS 39654  
Phone: (601)587-9346  
Fax: (601)587-2980  
Email: jeff.quin@lawrence.k12.ms.us

The mission of the LCTCC is to provide a safe and positive environment where individuals receive challenging academic and technological instruction that will build occupational and citizenship skills, which in turn will allow them to develop and maintain successful careers.



**Angela Kitchens**

---

**From:** Rex Buckhaults <rmbuckhaults@jonesk12.org>  
**Sent:** Thursday, January 14, 2021 2:41 PM  
**To:** Accreditation Shared  
**Subject:** WorkKeys addition to College and Career Readiness Indicator

TO: Alan Burrow

FROM: Rex Buckhaults, MASCTA Board Member /Career Technical Director

SUBJECT: WorkKeys addition to College and Career Readiness Indicator

DATE: January 14, 2021

The Mississippi Association of Secondary Career & Technical Administrators (MASCTA) Board of Directors respectfully submits the following comments and recommendations regarding the proposed recommendation of adding the ACT WorkKeys assessment and successfully completing an industry certification or career pathway recognized by the Mississippi Department of Education.

The MASCTA board would like to make the following comments.

- Career Pathway training through completion of a CTE program provides Mississippi students with the highest level of career training and should therefore be considered the strongest indicator of Career-Readiness within the Accountability Model.
- Several CTE pathway programs recognized by MDE offer nationally recognized certifications; however, there are some CTE Pathway programs that do not currently have national certifications associated with them. The national certifications that are currently recognized by the SBE are already included in the Acceleration component of the Accountability Model; therefore, we do not believe national certifications should also be required along with the ACT WorkKeys. However, the MASCTA Board of Directors strongly supports the MDE's recommendation to add the ACT WorkKeys as an indicator of career readiness along with the completion of a career pathway.
- Finally, we request consideration for adding additional weight to the numerator of the College- and Career- Readiness indicator for any student who completes a career pathway program . For example, A Silver Level or above on the WorkKey certification could count as 1 in the numerator; however, a student who completes a CTE pathway in addition to WorkKeys should calculate at a higher weight of 1.2 or higher. The justification for this recommendation is that any student who completes a career pathway program and graduates high school with specialized career skills should be considered much more career ready than a student who only completed the ACT WorkKeys at the Silver Level.

The MASCTA Board of Directors strongly believe the request to add additional weight in the numerator for career pathway completers would provide an accurate reflection through the accountability model for all school districts that are training students for the workforce. We believe this request is comparable to the additional

weight that is already calculated in the acceleration component for AP courses which are preparing students for college (see section 9.4 on page 36 in the Mississippi Public School Accountability Standards).

Thank you for taking the time to read our comments and take into consideration true and accurate measures of Career Readiness.

Sincerely,

MASCTA Board Member

Rex Buckhaults - Director  
Jones County Career-Technical Center  
2409 Moose Drive  
Laurel, MS 39440  
Office: 601-425-2378  
Fax: 601-425-2349  
Cell: 601-498-5528  
E-mail: [rbuckhaults@jonesk12.org](mailto:rbuckhaults@jonesk12.org)

From: [Danichols@itawambacountyschools.com](mailto:Danichols@itawambacountyschools.com)  
To: David Nichols - Accreditation Shared  
Subject: Letter - Silver Level on WorkKeys & CTE Students  
Date: Thursday, January 14, 2021 2:51:38 PM

David Nichols, Jr. (Andy)  
Digital Media

Phone: 662-862-3137 Fax: 662-862-3138  
Email: [danichols@itawambacountyschools.com](mailto:danichols@itawambacountyschools.com)

200 Career Technical Drive  
Fulton, MS 38843  
website: [itawambacountyschools.com](http://itawambacountyschools.com)



*Serving All Itawamba County Schools*

January 14, 2021

Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mde12.org](mailto:accreditation@mde12.org)

Dear Mr. Burrow,

I agree with President Trump about the importance of Career & Technical Education. Trump said that the less academically inclined should learn bricklaying or carpentry or other trades. He also talked about filling the job demand for trained workers.

I believe the completion of a 2 year CTE program is also an indicator to employers that the student will complete something they start. I also believe that a Silver Level requirement on the WorkKeys assessment would help the job outlook of the students.

This will better prepare our students for a career or seeking a college education.

Sincerely,

A handwritten signature in black ink that reads "David A. Nichols, Jr." in a cursive style.

David A. Nichols, Jr. (Andy)

## Angela Kitchens

---

**From:** Sanford Johnson <sjohnson@teachplus.org>  
**Sent:** Thursday, January 14, 2021 4:49 PM  
**To:** Accreditation Shared  
**Subject:** Teach Plus MS: Public Comments on ACT WorkKeys Recommendations

Dr. Burrow,

The State Board of Education's move to adopt ACT WorkKeys (hereafter "WorkKeys") as a measure of career readiness signals the embrace of a "both/and" approach to college and career readiness. We recognize the positive step of measuring career readiness, just as we measure college-readiness through the ACT. Fulfilling the limitless potential of Mississippi's children requires us to give all students meaningful access to all college and career pathways.

### **Fears about schools pushing students towards the easier test have been addressed.**

We initially had concerns that some schools/districts would push students towards WorkKeys instead of the more-rigorous ACT. Such a move would've prioritized accountability points at the expense of the postsecondary needs of students, particularly students of color.

The State Board has alleviated those concerns by requiring students seeking to replace their ACT score with WorkKeys to (1) obtain a Silver level score on the test and (2) complete an "industry certification or career pathway recognized by MDE."

### **Recommendations to the State Board of Education regarding implementation of ACT WorkKeys**

We are presenting additional changes to the College- and Career-Readiness Indicator section related to the implementation of WorkKeys:

#### **1 - Administer WorkKeys for all students in their second year of a CTE program.**

If WorkKeys is truly a quality measure of career-readiness, it should be treated as such, rather than used as an optional replacement for the college-readiness test. The test should be administered for students in the second year of an industry certification or career pathway program. While this recommendation will likely require state funding, there may be opportunities to fund the administration of WorkKeys through partnerships between school districts and regional or state economic development organizations.

#### **2 - Include WorkKeys as a third component of the College & Career Readiness (CCR) indicator.**

The current CCR component consists of ACT Math and ACT English/Reading components.

WorkKeys should be included as a third measure of the College and Career Readiness component. This Career-Readiness component should count for 10 points of the 50pt CCR component, along 20 points for ACT Math and 20 points for ACT English/Reading.

Example:

Magnolia School has 50 students who took the ACT and 23 met the Math benchmark.  
 $23 \div 50 = 0.46 \times 20 = 9.2$

Magnolia School has 50 students who took the ACT and 18 met the English/Reading benchmark.  
 $18 \div 50 = 0.36 \times 20 = 7.2$

Magnolia School has 20 students who took WorkKeys and 15 obtained "Silver Level".  
 $15 \div 20 = 0.75 \times 10 = 7.5$

TOTAL CCR = 23.9 of 50

**3 - Ensure that important data is tracked for CTE after program-wide implementation of WorkKeys.**

As the State Board moves to incorporate WorkKeys into the Accountability Model. Data should be collected that address the following topics:

- WorkKeys performance by CTE program
- WorkKeys performance by race/ethnicity
- WorkKeys performance by income level
- Demographic information about CTE placement/enrollment decisions
- Record of districts with anti-discrimination policies re: placement in CTE programs

Thank you in advance for considering our recommendations. We hope to work with you in the coming weeks to discuss additional testing and accountability issues.

Sincerely,

Syreata Brassell, Quitman County Middle School  
Kendall Hardy, Holly Springs High School  
Rachel Johnson, Buckatunna School (Wayne Co.)  
Nicole Moore, Coahoma Early College High School  
Erica Scott, Ocean Springs High School  
Sanford Johnson, Executive Director of Teach Plus Mississippi



**Sanford Johnson** (he/him) /  
Mississippi Executive Director

662.402.8268 | Clarksdale, MS





## Moss Point School District

### Superintendent's Office

4924 Church Street  
Moss Point, MS 39563  
(228) 475-4558  
[www.mpsd.k12.ms.us](http://www.mpsd.k12.ms.us)

To: Mr. Alan Burrow, Office of Accreditation

From: Dr. Shannon M. Vincent-Raymond, MPSD Superintendent

Date: January 14, 2021

RE: Comment on Statewide Accountability Model Change as it relates to CCR Component

Please accept the following as the comment for the use of the Work keys assessment to assess College and Career Readiness (CCR).

As the ACT Assessment is administered to all students, regardless of their intent to attend college, and the information is included in the College and Career Readiness (CCR) component of the State Accountability Model and is a measure of College readiness, the same should be true of the ACT Workkeys Assessment as recognized and recommended by the Accountability Task Force.

Further, we feel the inclusion of the ACT Workkeys Assessment is an extremely valuable tool for assessing the Career Readiness of our students and the CCR component will then truly have assessments designed to measure both College and Career Readiness, the true intent of that component.

With the addition of the Workkeys assessment, it is just as important to include that assessment for ALL students as it is to include the ACT assessment for ALL students, regardless of their post-secondary intent. The Workkeys assessment data should not be reserved for National Industry Certificated areas, nor Career Technical Diploma students. If all students must take the ACT to measure College readiness, regardless of intent to attend college, the same should be true of the Workkeys assessment to measure career readiness.

Therefore, we are in opposition of the MDE's modification of the Accountability Task Force recommendation for measuring student success on the Workkeys assessment. We fully support the use of a stand-alone Silver level benchmark on Work keys as the indicator of student CAREER-readiness for the purposes of the CCR Component in the Statewide Accountability Model.

CHALLENGE. ACHIEVE. SUCCEED.

To: Alan Butrows  
From: Blaise King  
Date: 1/12/21  
Subject: APA on WorkKeys in the Accountability Model

I am unequivocally supportive of using the WorkKeys Assessment. However, I do believe there are some concerns as it relates to the most recent proposal made to include WorkKeys (NCRC) in the accountability model under the CCR portion paired with another standard (national certification or MDE approved standard).

The ACT is comprised of Reading, English, Math, Science. These subjects are covered daily with all students that are in high school as a routine part of the curriculum. The NCRC is comprised of Applied Math, Graphic Literacy, Workplace documents. While these subjects may be grasped from some implied teaching, they are not explicitly covered in a multitude of classes. The NCRC is not applicable for many of our students' course work, which includes:

- Health Science
- Teacher Academy
- Digital Media
- Simulation & Animation
- Culinary Arts
- Automotive

If a student meets a certain score on the ACT, has an certain GPA, and graduates, that student will be accepted to a postsecondary institution based on that criteria. If a student earns a Silver on the NCRC (and a national certification), that student could possibly be granted an interview. Of the programs listed above, and while the list is not comprehensive, the only benefit of the NCRC would be for the Economic Development Agency for the county/state. Students in those programs need a national certification to enter the workplace or a qualifying ACT score to pursue a degree in higher education. The NCRC has no bearing on their potential employment or education after high school.

My fear with adding the NCRC to the CCR component is twofold. First, we are going to begin holding teachers, and schools/districts, accountable for content that isn't in their curriculum. If the results are going to be published and the rating is going to be dependent on these scores, the method in which content is delivered, and the type of content delivered, is going to be altered. It's human nature to want to meet the demands that are placed on someone and with this approach teachers will begin modifying the content that is taught in the class to meet the expectations of the state. This will be detrimental to the students and their opportunity for success after high school. Second, the NCRC should be prescriptive rather than determinative. The NCRC should be used to show students' their propensity for potential success in a career and technical related field. Instead, this model will wait until the student has completed the course of study, that does not contain the content of which they will be tested, to show them where they stand. If the true purpose is to increase career readiness, then we will be missing a significant portion of our students by implementing it this way.

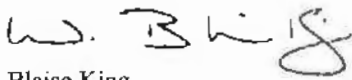
I understand that it is an "or" proposition with the ACT. However, what we have seen is that students that do not meet the state standards on the ACT, will not meet the Silver level on the NCRC. Therefore, it only makes logical sense for schools to focus efforts for students on the ACT. Afterall, it is the only one with a direct effect tied to the students' options after high school.

I reiterate that I am a fan of WorkKeys and the NCRC. However, I believe based on reasons stated above that we will negatively impact the students' relevant learning in the classroom and continue to do nothing to promote true career readiness.

- Concerns
  - Funding
  - Which students
    - Grade level, completer, after year 1, etc.
    - Can scores be banked
  - Testing window
    - Based on documents that were sent to DTCs, the testing window will also be during CPAS
    - Is this the only time that students are allowed to take WorkKeys for it to count in the accountability model?
  - Who controls the data
    - Is MDE going to be responsible for disseminating information to Economic Development Agencies (EDAs)?
  - Can we retest in one area to get the student to Silver
    - How will this work for EDAs who need to show growth to maintain work ready communities
    - If we fund this test, who gets the results? How will we have the results to be able to test that student a second time
    - I ask most of this based on student interest. If we're doing it to have another exam, then no need to explain. If we are trying to serve students the best way possible, this option will need to be resolved.

In conclusion my recommendation is to use WorkKeys in the Acceleration component of the Accountability Model as a stand-alone test.

Respectfully,



Blaise King



Mr. Alan Burrow, Executive Director  
District and School Performance  
Mississippi Department of Education  
[accreditation@mde.k12.org](mailto:accreditation@mde.k12.org)

Dear Mr. Burrow,

I am writing on behalf of the Laurel School District regarding the ACT WorkKeys assessment, and submit the following as part of the APA process.

We feel that students scoring Silver or above on the WorkKeys assessment should be included in the numerator for the Math and/or English components of the College and Career Readiness component in lieu of the ACT benchmark requirement.

We do not agree with MDE's modification that results in students having to complete both their industry certification, along with meeting the Silver level on the WorkKeys test to be included in the component. Currently, many programs do not offer a national certification or an equivalent. We feel this combination does not truly measure whether a student is "career ready." According to reports, industries consider a Silver level as a good indicator of success.

We are in favor of allowing a Silver level score to be considered successful in lieu of the ACT college prep benchmark.

Thank you for your consideration,

Dr. Toy L. Watts  
Superintendent

Toy L. Watts, PhD

Superintendent

Laurel School District

303 West 8th Street Laurel, MS 39440

601-649-6391

**Confidentiality Notice:** 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.

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

**25. College- and Career-Readiness Indicator**

The following rules will apply only if the state legislature mandates statewide ACT testing and appropriates funding for such testing.

- 25.1 The ACT or ACT WorkKeys assessment will be used in the College- and Career-Readiness Indicator.
- 25.2 The College- and Career-Readiness component will be comprised of a Mathematics and an English/Reading component. These two (2) components will be equally weighted and combined for one (1) score worth 50 points:  $(\text{Math} + \text{English/Reading}) \div 2$
- 25.3 A student will be included in the numerator for Mathematics if he/she is considered College- and Career-Ready in Mathematics by having a score on the Mathematics component of the ACT at or above the ACT College Readiness Benchmark for the Mathematics component at the time of the student's assessment.
- 25.4 A student will be included in the numerator for English/Reading if he/she is considered College- and Career- Ready in English/Reading by having a score on the English component of the ACT at or above the ACT College Readiness Benchmark OR if his/her score on the Reading component of the ACT is at or above the ACT College-Readiness Benchmark at the time of the student's assessment.
- 25.5 Science ACT sub-scores will not be included in the College- and Career-Readiness component.
- 25.6 ACT Composite scores will not be included in the College- and Career-Readiness component. (Rationale: ACT does not designate a composite score to indicate college readiness.)
- 25.7 The highest available sub-score for each student at the end of month nine (9) in Mathematics and English/Reading, as described above, will be used in the College- and Career-Readiness Indicator accountability calculations.
- 25.8 Contingent upon legislative funding, the state will pay for one (1) statewide ACT administration to be held in the spring for students classified in MSIS as 11th graders. Ungraded students whose birthdates link them to the cohort of students identified as 11th graders will also be included. Students may take the ACT as many additional times as they choose, at their own expense.
- 25.9 If the IEP committee deems it appropriate, an SCD student may participate in the administration of the ACT.
- 25.10 Deleted.
- 25.11 A student's score will be applied to the school in which the student is enrolled in MSIS at the time of the Senior Snapshot.
- 25.12 In lieu of the performance requirements established in Sections 25.3, and 25.4, a student may obtain a Silver level or higher National Career Readiness Certificate administered through the ACT WorkKeys assessment and successfully complete an industry certification or career pathway recognized by the Mississippi Department of Education.
- 25.13 The participation rate numerator will include the state administration or non-state administration of the ACT. The denominator will include all students in the Senior Snapshot.
- 25.14 The denominator for the College- and Career-Readiness component calculation will consist of all students participating in the ACT as identified in the participation calculation.

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

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

**25. College- and Career-Readiness Indicator**

The following rules will apply only if the state legislature mandates statewide ACT testing and appropriates funding for such testing.

- 25.1 The ACT or ACT WorkKeys assessment will be used as in the College- and Career-Readiness Indicator.
- 25.2 The College- and Career-Readiness component will be comprised of a Mathematics and an English/Reading component. These two (2) components will be equally weighted and combined for one (1) score worth 50 points:  $(\text{Math} + \text{English/Reading}) \div 2$
- 25.3 A student will be included in the numerator for Mathematics if he/she is considered College- and Career-Ready in Mathematics by having a score on the Mathematics component of the ACT at or above the ACT College Readiness Benchmark for the Mathematics component at the time of the student's assessment.
- 25.4 A student will be included in the numerator for English/Reading if he/she is considered College- and Career- Ready in English/Reading by having a score on the English component of the ACT at or above the ACT College Readiness Benchmark OR if his/her score on the Reading component of the ACT is at or above the ACT College-Readiness Benchmark at the time of the student's assessment.
- 25.5 Science ACT sub-scores will not be included in the College- and Career-Readiness component.
- 25.6 ACT Composite scores will not be included in the College- and Career-Readiness component. (Rationale: ACT does not designate a composite score to indicate college readiness.)
- 25.7 The highest available sub-score for each student at the end of month nine (9) in Mathematics and English/Reading, as described above, will be used in the College- and Career-Readiness Indicator accountability calculations.  
~~25.7.1 Deleted~~
- 25.8 Contingent upon legislative funding, the state will pay for one (1) statewide ACT administration to be held in the spring for students classified in MSIS as 11th graders. Ungraded students whose birthdates link them to the cohort of students identified as 11th graders will also be included. Students may take the ACT as many additional times as they choose, at their own expense.
- 25.9 If the IEP committee deems it appropriate, an SCD student may participate in the administration of the ACT.
- 25.10 ~~The ACT scores of all students identified in the Senior Snapshot will be included in the calculation. Deleted~~
- 25.11 A student's score will be applied to the school in which the student is enrolled in MSIS at the time of the Senior Snapshot.
- 25.12 ~~No other assessments will be allowed as a substitution for the ACT in the College- and Career-Readiness component. In lieu of the performance requirements established in Sections 25.3, and 25.4, a student may obtain a Silver level or higher National Career Readiness Certificate administered through the ACT WorkKeys assessment and successfully complete an industry certification or career pathway recognized by the Mississippi Department of Education.~~
- 25.13 The participation rate numerator will include the state administration or non-state administration of the ACT. The denominator will include all students in the Senior Snapshot.
- 25.14 The denominator for the College- and Career-Readiness component calculation will consist of all students participating in the ACT as identified in the participation calculation.