

**OFFICE OF CHIEF ACCOUNTABILITY OFFICER**  
**Summary of State Board of Education Agenda Items**  
**June 19, 2025**

**OFFICE OF DISTRICT AND SCHOOL PERFORMANCE**

03. Action: Approval to revise Miss. Admin. Code 7-24: *Mississippi Public School Accountability Standards, 2024* specifically the business rules of the Mississippi Statewide Accountability System, Section 4, *Participation Rates*, Section 6, *Growth*, Section 9, *Acceleration*, Section 10, *Banking Scores: End-of-course, subject area assessments taken before 10th grade*, Section 16, *Students with Disabilities*, Section 18, *Invalid Test Scores*, Section 22, *Schools without Tested Subjects or Grades*, Section 23, *State and Other Special Schools*, Section 25, *College and Career-Readiness Indicator*, Section 26, *Senior Snapshot*, and Section 27, *Other* [Goals 1, 2, 3, 4, 5, and 6 – MBE Strategic Plan]  
(Has cleared the Administrative Procedures Act process with public comments)

Background Information: The MDE in consultation with the Accountability Task Force (ATF) is proposing changes to the business rules of the Mississippi Statewide Accountability System to be effective with the 2025-2026 school year. The Commission on School Accreditation met on April 15, 2025, and voted unanimously to approve the proposed changes.

This item has cleared the Administrative Procedures Act (APA) process with public comments. The public comment period was open from April 17, 2025, through 5:00 p.m., May 23, 2025.

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

Recommendation: Approval

Back-up material attached

**Proposed revisions to Miss. Admin. Code: 7-24, *Mississippi Public School Accountability Standards, 2024*, specifically, the business rules of the Mississippi Statewide Accountability System  
Summary of Administrative Procedures Act (APA) Comments**

<b>The Office of District and School Performance received the following APA comments regarding the proposed revisions to the Business Rules of the <i>Mississippi Public School Accountability Standards, 2024</i>.</b>	
<b>Summary of Comments</b>	<b>MDE Response</b>
<p><b>Susie Brown, Director, Holly Springs Career and Technical Center</b> I support reallocating the 50 points from U.S. History to a 3-part College and Career Readiness component. However, the expectations within this component must be realistic and attainable for students across the state.</p> <p>The proposed ACT Superscore of 25 is unrealistic when compared to the current state average composite score of 17.5. A target score 7.5 points above the state average sets an impractical benchmark. I recommend adjusting the Superscore benchmark to 20. Additionally, the ASVAB benchmark should be aligned with the United States Armed Services standard of 40 points.</p> <p>Setting Platinum as the standard is misaligned with industry expectations, which typically require a Silver level for career readiness. Awarding 0.25 points for Bronze does not reflect industry standards and should be reconsidered—no points should be awarded for Bronze. The Gold level should remain the standard for full points, with Silver recognized as part of a career and technical education pathway. This structure will incentivize student participation in CTE programs.</p> <p>The Career and Technical diploma needs a clearer definition, especially since not all districts offer Career and Technical dual credit opportunities. To ensure equity, students on the CTE track should be permitted to take any available dual credit classes to meet requirements.</p>	<p>The new assessment component of the Readiness Index establishes levels that not only recognize standards for readiness but recognition of exceptional performance.</p> <p>Diploma endorsements are not defined by the ODSP.</p>

The Office of District and School Performance received the following APA comments regarding the proposed revisions to the Business Rules of the <i>Mississippi Public School Accountability Standards, 2024</i> .	
<p><b>Dr. Earl Watkins, Superintendent, MS Achievement School Districts, Humphreys County and Yazoo City</b></p> <p>1. Regarding the "Achievement Measure (Readiness Indicator)", consider giving more numerical value to the numerator for the traditional diploma. It might be helpful as well to publicize, by district, trend data on the number of graduates that have obtained high school diploma endorsements. While embedding this in the accountability model elevates the importance of the endorsements, the publication of these data could lead to better questions about why we are or are not producing more diplomas with endorsements and what is the potential accountability impact on schools and school districts.</p> <p>2. Reconsider the proposed values for the numerator for the Assessment Measure (Readiness Indicator). Does MDE currently see a strong correlation between MAP assessment results on our current MCCRS with improvements in ACT trend data? If a strong correlation exists, then we should expect improved ACT outcomes across school districts. If not, why should we tie accountability to an outcome (ACT) that does not correlate to the standards that we currently assess?</p> <p>3. Consider holding districts harmless in the first year of implementing the new accountability model.</p>	<p>1. The intent of this new indicator is to incentivize the diploma endorsement program and to improve district participation in it. Additionally, accountability serves to inform the public about the services and programs provided to students by districts.</p> <p>2. The intent of this indicator is to incentivize improvement in assessment programs such as the ACT and ACT WorkKeys.</p> <p>3. Off Topic</p>
<p><b>Dr. Greg Paczak, Director of Assessment &amp; Accountability, Madison County School District</b></p> <p>In reviewing the criteria for the newly proposed Assessment Readiness Indicator, we observed that the top performance thresholds—specifically ACT 25 and ASVAB 93—reflect thresholds that exceed the current standards that show preparedness for students to successfully engage in college-level courses and military enlistment. For instance, the highest ACT benchmark to show college readiness is a science score of 23. Even if we take the average of the four ACT Readiness Benchmarks, that will produce a composite score lower than the current proposed threshold (ACT = 25) set to receive full credit for the Assessment Readiness component. Additionally, the current proposed ASVAB score of 93 reflects the top 7 percent of test takers and is consider Exceptional Aptitude for military enlistment. However, an ASVAB score of 65 aligns with Above Average and Strong Academic and Cognitive Skills for enlistment. See Table 4.6 AFQT Distributions</p>	<p>The new assessment component of the Readiness Index establishes levels that not only recognize standards for readiness but recognition of exceptional performance.</p> <p>In order to ensure equivalent levels of performance across the multiple assessments, scores were aligned based on publicly reported alignment studies. This ensures that levels of recognition do not include an easiest alternative, rather, equivalent levels of rigor.</p>

<p><b>The Office of District and School Performance received the following APA comments regarding the proposed revisions to the Business Rules of the Mississippi Public School Accountability Standards, 2024.</b></p>	<p>for 1980 and 1997 Scales (continued) on page 46 from Development and Evaluation of 1997 ASVAB Score Scale to see how ranges were determined.</p> <p>The current proposed thresholds exceed current ACT benchmarks and align with highly competitive postsecondary placement rather than demonstrating college and career readiness. As a result, they may unintentionally exclude students who meet the state and national level standards for readiness, including the workforce or military service. While we appreciate the intent to elevate CTE pathways, it introduces significant traceability and implementation challenges under current Mississippi Department of Education (MDE) systems. Therefore, we urge consideration of a revised diploma structure that maintains the integrity of existing academic and CTE endorsement standards, while preserving clarity in data tracking and accountability.</p> <p>Our district is concerned that the current proposal—merging CTE requirements directly into the Distinguished Diploma—is not supported by the current data, accountability, or reporting systems. Specifically:</p> <ul style="list-style-type: none"> <li>· No MSIS Fields: The Mississippi Student Information System (MSIS) does not contain a code or data structure to reflect a hybrid “Distinguished CTE” diploma.</li> <li>· No Appendix Alignment: The proposal does not fit cleanly within the current endorsement definitions in Appendices A-6 through A-10 of the Accountability Standards.</li> <li>· Reporting Breakdown: Without formal integration into MSIS, the merged endorsement cannot be tracked for transcript auditing, accountability reporting, or compliance with state/federal requirements (e.g., Perkins V, ESSA).</li> </ul> <p>This presents significant implementation challenges for districts, including:</p> <ul style="list-style-type: none"> <li>· Unclear student tracking and verification at the local level,</li> <li>· Potential inconsistency in awarding endorsements across districts,</li> <li>· Inability to ensure accurate accountability and graduation reporting.</li> </ul> <p>Beginning with the 2025–2026 school year, Proposed Business Rule 27.3 will include students who drop out in Month 9 or later of 11th grade, or at any point in 12th grade, in the Senior Snapshot. While these students are already reflected in the graduation rate, their inclusion in the Senior Snapshot may also lower participation and readiness outcomes. This adjustment could negatively affect accountability outcomes, particularly for schools with high transient populations or</p> <p>Districts will continue to self-report diploma endorsements consistent with current practice. Distinguished measures for CTE and JROTC endorsements will be automatically calculated using supporting data captured in MSIS. New data elements will be added to MSIS to support needed data capture.</p> <p>Senior Snapshot still requires continuous enrollment beginning in month 1 of the 10<sup>th</sup> grade and continuing until completion.</p>
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<p><b>The Office of District and School Performance received the following APA comments regarding the proposed revisions to the Business Rules of the Mississippi Public School Accountability Standards, 2024.</b></p> <p>small graduating classes, where each student would have a disproportionate impact on graduation rates, readiness measures, and participation.</p> <p>It is important to recognize that student mobility and small cohort sizes are external factors beyond a school's control. Holding schools accountable for conditions outside of their influence may compromise the fairness of the accountability model. Additionally, schools consistently work to support transfer students and ensure testing when possible; however, they cannot offer testing opportunities to students who drop out. Including these students in the Senior Snapshot may unfairly penalize schools for conditions beyond their control.</p>	<p>Off topic. The ODSP does not define endorsement requirements.</p>
<p><b>Chereda Daugherty, High School Instructional Specialist, DeSoto County School District</b></p> <p>Under the Academic Endorsement, students must earn a 17 in English and a 19 in Math on the ACT or take an Essential to Math or Essential to Literacy course. However, we have an agreement through Northwest Community College and MS Valley State University. NWCC allows students to take English Comp I with an ACT English subscore of 15 and MSVSU allows students to take College Algebra with an ACT Math subscore of 17. Therefore, if you change the policy (as we did for early release) to reflect Essential course or college-level course for math and English this would make it easier to decipher who qualifies for the endorsement.</p> <p>Our reasoning for this request is that the Essential courses are to allow students to bypass remedial courses for math and English in college. If they qualify by the college-level course requirements, they should be able to use the College Algebra and English Comp courses for the Academic Endorsement requirements.</p>	<p>Districts will continue to self-report diploma endorsements consistent with current practice. Distinguished measures for CTE and JROTC endorsements will be automatically calculated using supporting data captured in MSIS.</p>
<p><b>Dr. Scott Rimes, Superintendent of Education, Rankin County School District</b></p> <p>Business Rules</p> <p>26. Achievement Measure (Readiness Indicator) We use our student information system to self-report diploma endorsements currently. Will diploma endorsements continue to be self-reported through the district's student information system going forward or will there be a way to track endorsements?</p>	



<p><b>The Office of District and School Performance received the following APA comments regarding the proposed revisions to the Business Rules of the Mississippi Public School Accountability Standards, 2024.</b></p>	
<p>26.5 Distinguished Diploma If a student received the CTE or JROTC endorsement along with the additional criteria (earns 28 credits, an overall GPA of 3.0 or greater, and a gold or platinum NCRC WorkKeys certificate), how will their endorsement be reported to show the difference between them and the CTE/JROTC endorsements without the additional criteria, given that there is a difference in how many points each earns in accountability?</p>	<p>This rule will not create a new endorsement; however, it will be a measure of exceptional performance for students that receive a CTE/JROTC endorsement. The score will be reflected in the student level accountability information data file (SLAIF).</p>
<p><b>Ryan Kuykendall, Chief Accountability Officer for DeSoto County Schools</b>  <i>Based on the business rules that are out for APA, there are three situations that I see having to be decided with using the Senior Snapshot for the Achievement indicator. This will likely need to be written explicitly in the business rules in some manner:</i></p> <ol style="list-style-type: none"> <li><i>1. Students that are listed as traditional for month 9 but take the ACT to meet the academic level, but not in time for June 30th. Are they counted as traditional in year 4 and not carried over to the following year where they can earn the academic credit?</i></li> <li><i>Follow up-If they are not, will MSIS reporting in July be something different from accountability since it ended in June?</i></li> <li><i>2. Students that are listed as a non-graduate for month 9 but go to summer school to meet the traditional diploma, but not in time for June 30th. Are they counted as a 0 in the numerator in year 4 and not carried over to the following year where they can earn the traditional credit?</i></li> </ol> <p><i>Follow up-If they are not, will MSIS reporting in July be something different from accountability since it ended in June?</i></p> <ol style="list-style-type: none"> <li><i>3. Students that do not have a status listed in month 9, that take the ACT in the summer or go to summer school to meet the traditional or academic level, but not in time for June 30th. Are they carried over to the following year?</i></li> </ol> <ul style="list-style-type: none"> <li><i>Follow-up-If so, will they count as whatever they obtained by June 30th in the 4th year during the next year?</i></li> </ul> <p><i>2<sup>nd</sup> follow up-How will these students be reported in July MSIS reporting?</i></p> <p><i>If these answers are what I think they are, I think this will encourage schools to leave many students blank in month 9 essentially creating scenario #3. I am not sure if that is what we want to happen. That may skew the data each year. Then schools have to "guess" or "gamble"</i></p>	<p>1. The cutoff for endorsements will be June 30<sup>th</sup> each year; therefore, an ACT score reported after June 30<sup>th</sup> would not change the endorsement.</p> <p>2 and 3. Students that complete between June 30<sup>th</sup> and July 31<sup>st</sup> would be included in the following year, as traditional graduates.</p>

<p><b>The Office of District and School Performance received the following APA comments regarding the proposed revisions to the Business Rules of the Mississippi Public School Accountability Standards, 2024.</b></p>	<p>during month 9 on marking something on those that may go up in the summer.</p> <p><i>This was always going to be the issue with using the Senior Snapshot (to count some, all or none of the summer-and how). The good news is we are talking about a small percentage, but it does force schools to find and make a choice on students that have any chance of moving up. I am not sure that is possible to do really though.</i></p> <p><i>I understand using the same year as the graduation cohort may feel very removed since there is 5<sup>th</sup> year credit here. However, if several groups of students will go forward to the 5<sup>th</sup> year because they are not complete in year 4, we may need to use that same cohort to make things consistent.</i></p> <p><i>If we are going to use the Senior Snapshot to coincide with the Assessment component, we may need to have a have hard break for the achievement status at Month 9 or figure out a way to go through July 31. Going through July 31 is the only way to make MSIS reporting consistent with the true final status it seems.</i></p> <p><i>Otherwise, this could create a situation where students' final status in June or July has to be "ignored." Will that cause an issue regarding accurate MSIS reporting?</i></p>	
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## Comments on Proposed Accountability Changes

May 23, 2025

### Proposed Changes and Feedback on Accountability System Revisions

- **Proposed Change:** *Shifting the 50 points currently assigned to the U.S. History assessment to a 3-part College and Career Readiness component totaling 150 points.*  
**Feedback:** I support reallocating the 50 points from U.S. History to a 3-part College and Career Readiness component. However, the expectations within this component must be realistic and attainable for students across the state.
- **Proposed Change:** *Using the highest available ACT Superscore, ACT National Career Readiness Certificate (NCRC) score, SAT, or ASVAB score for each student by the end of the ninth month in 12th grade.*  
**Feedback:** The proposed ACT Superscore of 25 is unrealistic when compared to the current state average composite score of 17.5. A target score 7.5 points above the state average sets an impractical benchmark. I recommend adjusting the Superscore benchmark to 20. Additionally, the ASVAB benchmark should be aligned with the United States Armed Services standard of 40 points.
- **Proposed Change:** *Awarding points for ACT WorkKeys using a graduated scale (0, 0.25, 0.50, 0.75, and 1).*  
**Feedback:** Setting Platinum as the standard is misaligned with industry expectations, which typically require a Silver level for career readiness. Awarding 0.25 points for Bronze does not reflect industry standards and should be reconsidered—no points should be awarded for Bronze. The Gold level should remain the standard for full points, with Silver recognized as part of a career and technical education pathway. This structure will incentivize student participation in CTE programs.
- **Proposed Change:** *Implementing a similar graduated scale to award points for various diploma types and endorsements.*  
**Feedback:** The Career and Technical diploma needs a clearer definition, especially since not all districts offer Career and Technical dual credit opportunities. To ensure equity, students on the CTE track should be permitted to take any available dual credit classes to meet requirements.



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**comments regarding the proposed revision to Miss. Admin. Code 7-24**

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**From** Earl Watkins <ewatkins@masd.k12.ms.us>

**Date** Tue 5/20/2025 10:02 AM

**To** Accreditation Shared <accreditation@mdek12.org>

**External Email**

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Dr. Burrow ([accreditation@mdek12.org](mailto:accreditation@mdek12.org)) - Please note my comments regarding the proposed revision to Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards ---

1. Regarding the "Achievement Measure (Readiness Indicator)", consider giving more numerical value to the numerator for the traditional diploma. It might be helpful as well to publicize, by district, trend data on the number of graduates that have obtained high school diploma endorsements. While embedding this in the accountability model elevates the importance of the endorsements, the publication of these data could lead to better questions about why we are or are not producing more diplomas with endorsements and what is the potential accountability impact on schools and school districts.
2. Reconsider the proposed values for the numerator for the Assessment Measure (Readiness Indicator). Does MDE currently see a strong correlation between MAAP assessment results on our current MCCRS with improvements in ACT trend data? If a strong correlation exists, then we should expect improved ACT outcomes across school districts. If not, why should we tie accountability to an outcome (ACT) that does not correlate to the standards that we currently assess?
3. Consider holding districts harmless in the first year of implementing the new accountability model.

TO: Mr. Alan Burrow  
Associate State Superintendent  
Mississippi Department of Education, Office of District and School Performance

FROM: Mr. Ted Poore  
Superintendent

Dr. Greg Paczak  
Director of Assessment & Accountability

Dr. Elizabeth Wells  
Assessment & Accountability Coordinator

DATE: May 19, 2025

SUBJECT: Administrative Procedures Act (APA) Process Response to the Proposed  
Mississippi Statewide Accountability System Revisions from the April 2025 State  
Board Meeting

### **Assessment Readiness Indicator**

#### ***Concern***

In reviewing the criteria for the newly proposed Assessment Readiness Indicator, we observed that the top performance thresholds—specifically ACT 25 and ASVAB 93—reflect thresholds that exceed the current standards that show preparedness for students to successfully engage in college-level courses and military enlistment. For instance, the highest ACT benchmark to show college readiness is a science score of 23. Even if we take the average of the four ACT Readiness Benchmarks, that will produce a composite score lower than the current proposed threshold (ACT = 25) set to receive full credit for the Assessment Readiness component. Additionally, the current proposed ASVAB score of 93 reflects the *top 7 percent* of test takers and is considered *Exceptional Aptitude* for military enlistment. However, an ASVAB score of 65 aligns with *Above Average* and *Strong Academic and Cognitive Skills* for enlistment. See *Table 4.6 AFQT Distributions for 1980 and 1997 Scales (continued)* on page 46 from *Development and Evaluation of 1997 ASVAB Score Scale* to see how ranges were determined.

The current proposed thresholds exceed current ACT benchmarks and align with highly competitive postsecondary placement rather than demonstrating college and career readiness. As a result, they may unintentionally exclude students who meet the state and national level standards for readiness, including the workforce or military service

### ***Recommendation***

As an alternative, we propose the following for the Assessment Readiness Category so that there is a strong alignment across state definitions and national standards.

	<b>0</b>	<b>0.25</b>	<b>0.50</b>	<b>0.75</b>	<b>1</b>
<b>ACT</b>	Below 15	15-16	17-19	20-21	22 and above
<b>SAT</b>	Below 850	850-919	920-1019	1020-1089	1090 and above
<b>Workkeys</b>	No Certification	Bronze	Silver	Gold	Platinum
<b>ASVAB</b>	Less than 31	31-41	42-49	50-64	65-99

### ***Achievement Readiness Indicator***

#### ***Concern***

While we appreciate the intent to elevate CTE pathways, it introduces significant traceability and implementation challenges under current Mississippi Department of Education (MDE) systems. Therefore, we urge consideration of a revised diploma structure that maintains the integrity of existing academic and CTE endorsement standards, while preserving clarity in data tracking and accountability.

Our district is concerned that the current proposal—merging CTE requirements directly into the Distinguished Diploma—is not supported by the current data, accountability, or reporting systems. Specifically:

- No MSIS Fields: The Mississippi Student Information System (MSIS) does not contain a code or data structure to reflect a hybrid “Distinguished CTE” diploma.
- No Appendix Alignment: The proposal does not fit cleanly within the current endorsement definitions in Appendices A-6 through A-10 of the Accountability Standards.
- Reporting Breakdown: Without formal integration into MSIS, the merged endorsement cannot be tracked for transcript auditing, accountability reporting, or compliance with state/federal requirements (e.g., Perkins V, ESSA).

This presents significant implementation challenges for districts, including:

- Unclear student tracking and verification at the local level,
- Potential inconsistency in awarding endorsements across districts,
- Inability to ensure accurate accountability and graduation reporting.

### ***Recommendation***

We recommend adopting a three-tiered endorsement model that honors current MDE guidance (Standards 14.1.4–14.1.6) while clearly distinguishing between foundational and advanced levels of academic and career achievement:

#### **1. Traditional Diploma (No Endorsement)**

- Requirements: 24 Carnegie units (Appendix A-6).
- Purpose: Satisfies Mississippi’s base graduation requirements.

#### **2. Advanced Endorsement**

- Requirements: Minimum 26 Carnegie units.
- Pathways:
  - Academic: Current Academic Endorsement (Appendix A-8) including GPA and ACT requirements.
  - CTE/JROTC: Recommend retaining current requirements, which include:
    - Completion of an approved CTE program or JROTC curriculum,
    - Earning a silver level on ACT WorkKeys or equivalent,
    - 2.5 GPA or higher,
    - Participation in a capstone work-based experience or leadership activity.

#### **3. Distinguished Endorsement**

- Requirements: Minimum 28 Carnegie units.
- Pathways:
  - Academic: Current Distinguished Academic Endorsement (Appendix A-9), requiring:
    - 3.0 GPA,
    - College-readiness benchmarks (ACT 17 English / 19 Math),
    - At least one AP, IB, or dual credit course with a passing grade.
  - CTE/JROTC: Recommend maintaining the existing Advanced Endorsement requirements with additional rigorous elements to match the level of distinction expected in the academic path, including:
    - Completion of an advanced credential or postsecondary credit-bearing CTE course,
    - Leadership or service documentation (e.g., CTSO leadership, JROTC officer, or supervised service project),
    - 3.0 GPA minimum,
    - Advanced performance on WorkKeys, ASVAB, or aligned credentialing exams.

### **Senior Snapshot**

#### ***Concern***

Beginning with the 2025–2026 school year, Proposed Business Rule 27.3 will include students who drop out in Month 9 or later of 11th grade, or at any point in 12th grade, in the Senior Snapshot. While these students are already reflected in the graduation rate, their inclusion in the Senior Snapshot may also lower participation and readiness outcomes. This adjustment could negatively affect accountability outcomes, particularly for schools with high transient populations or small graduating classes, where each student would have a disproportionate impact on graduation rates, readiness measures, and participation.

It is important to recognize that student mobility and small cohort sizes are external factors beyond a school's control. Holding schools accountable for conditions outside of their influence may compromise the fairness of the accountability model. Additionally, schools consistently work to support transfer students and ensure testing when possible; however, they cannot offer testing opportunities to students who drop out. Including these students in the Senior Snapshot may unfairly penalize schools for conditions beyond their control.

#### ***Recommendation***

We respectfully ask the Mississippi Department of Education to consider the potential impact of this rule and explore accountability safeguards for schools serving small or transient populations.

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**Proposed revisions to Miss. Admin. Code: 7-24, Mississippi Public School Accountability Standards, 2024, Appendices A-5 – A-9, F and the Glossary**

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**From** Chereda Daugherty <chereda.daugherty@dcsms.org>

**Date** Wed 5/14/2025 1:30 PM

**To** Accreditation Shared <accreditation@mdek12.org>

**External Email**

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**Proposed revisions to Miss. Admin. Code: 7-24, Mississippi Public School Accountability Standards, 2024, Appendices A-5 – A-9, F and the Glossary.**

To Mr. Alan Burrow,

Under the Academic Endorsement, students must earn a 17 in English and a 19 in Math on the ACT or take an Essential to Math or Essential to Literacy course. However, we have an agreement through Northwest Community College and MS Valley State University.

NWCC allows students to take English Comp I with an ACT English subscore of 15 and MSVSU allows students to take College Algebra with an ACT Math subscore of 17.

Therefore, if you change the policy (as we did for early release) to reflect Essential course or college-level course for math and English this would make it easier to decipher who qualifies for the endorsement.

Our reasoning for this request is that the Essential courses are to allow students to bypass remedial courses for math and English in college. If they qualify by the college-level course requirements, they should be able to use the College Algebra and English Comp courses for the Academic Endorsement requirements.



**Chereda Daugherty**

HIGH SCHOOL INSTRUCTIONAL SPECIALIST:  
MATH GRADES 9-12



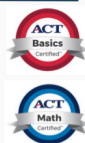
662-449-7157



chereda.daugherty@dcsms.org



twitter.com/CheredaD\_Math





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## APA Comments

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**From** White, Lavonda <lwhite@rcsd.ms>

**Date** Wed 5/14/2025 12:01 PM

**To** Accreditation Shared <accreditation@mdek12.org>

 1 attachment (59 KB)

APA Comment - Accountability Business Rules.pdf;

### External Email

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Hello Mr. Burrow,

Please see the attached comments from Rankin County School District in response to the Administrative Procedures Act Notice for the Proposed revision of Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2024, specifically the business rules of the Mississippi Statewide Accountability System.

Thank you,  
LaVonda

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LaVonda White, Ed.D., NBCT  
Director of Accountability, Accreditation, and Assessment  
Rankin County School District  
601-825-5590

 National Board Certified Teacher (Renewed/MOC)

### 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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**APA statement**

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From Ryan Kuykendall <ryan.kuykendall@dcsms.org>

Date Mon 5/5/2025 10:37 AM

To Accreditation Shared <accreditation@mdek12.org>

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Good afternoon,

Below is an APA statement regarding the **Proposed revision of Miss. Admin. Code 7-24: Mississippi Public School Accountability Standards, 2024...**

*Based on the business rules that are out for APA, there are three situations that I see having to be decided with using the Senior Snapshot for the Achievement indicator. This will likely need to be written explicitly in the business rules in some manner:*

- 1. Students that are listed as traditional for month 9 but take the ACT to meet the academic level, but not in time for June 30th. Are they counted as traditional in year 4 and not carried over to the following year where they can earn the academic credit?  
Follow up-If they are not, will MSIS reporting in July be something different from accountability since it ended in June?*
- 2. Students that are listed as a non-graduate for month 9 but go to summer school to meet the traditional diploma, but not in time for June 30th. Are they counted as a 0 in the numerator in year 4 and not carried over to the following year where they can earn the traditional credit?  
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Follow-up-If so, will they count as whatever they obtained by June 30th in the 4th year during the next year?  
2<sup>nd</sup> follow up-How will these students be reported in July MSIS reporting?*

*If these answers are what I think they are, I think this will encourage schools to leave many students blank in month 9 essentially creating scenario #3. I am not sure if that is what we want to happen. That may skew the data each year. Then schools have to "guess" or "gamble" during month 9 on marking something on those that may go up in the summer.*

*This was always going to be the issue with using the Senior Snapshot (to count some, all or none of the summer-and how). The good news is we are talking about a small percentage, but it does force schools to find and make a choice on students that have any chance of moving up. I am not sure that is possible to do really though.*

*I understand using the same year as the graduation cohort may feel very removed since there is 5<sup>th</sup> year credit here. However, if several groups of students will go forward to the 5<sup>th</sup> year because they are not complete in year 4, we may need to use that same cohort to make things consistent.*

*If we are going to use the Senior Snapshot to coincide with the Assessment component, we may need to have a have hard break for the achievement status at Month 9 or figure out a way to go through July 31. Going through July 31 is the only way to make MSIS reporting consistent with the true final status it seems.*

*Otherwise, this could create a situation where students' final status in June or July has to be "ignored." Will that cause an issue regarding accurate MSIS reporting?*

*Ryan Kuykendall, Chief Accountability Officer for DeSoto County Schools*

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