April 29, 2019

Mr. Alan Burrow, Director
Office of District and School Performance
Mississippi Department of Education
P.O. Box 771
Jackson, MS 39205-0771

Dear Mr. Burrow,

Please accept the following public comments regarding revisions to the business rules of the Mississippi Statewide Accountability System.

Generally, it is a concern that rule changes made at the end of a school year, when it is too late for educators to adjust their systems to benefit from the changes, would be used to calculate school and district accountability ratings for that school year. This exacerbates the level of frustration educators have with a seemingly ever-changing model.

Section 1. Assignment of Performance Classifications

1.1.1 Application of percentiles following resetting of cut-points

The Parents’ Campaign has spoken out against the use of percentile rankings since the practice first was proposed and adopted in 2016. The practical and policy considerations underlying our opposition have been detailed in previous public comments submitted to the State Board of Education. Since you now are proposing to establish the 2016 percentile rankings as a permanent feature of the accountability system, I again ask members of the Board and staff of the MDE to consider the following:

The use of percentile rankings, a practice that inflicts a failing rating on 14 percent of schools, regardless of how schools as a whole perform, undermines public confidence in our system of rating school performance. The structure of the process is inherently unjust, ensuring fewer schools and districts in the top category (10 percent A-rated) than in the bottom category (14 percent F-rated). Every time scores are reset, which has happened frequently in recent years, schools and districts are pushed – mostly downward – into fixed brackets. This practice of imposing artificial limits on ratings categories contradicts the Board’s stated goal of moving all schools and districts to a rating of C or higher. Our accountability system should allow the actual performance of schools and districts to be reflected in a fair classification unrestrained by arbitrary boundaries.
Of particular concern is the adoption—and utilization in perpetuity—of the specific percentiles first implemented in 2016. The percentiles proposed for permanent use in the accountability model were adopted based on the score distribution related to an accountability model that has changed repeatedly since 2016. That score distribution was based, in large part, on scores obtained on one administration of state assessments, some of which have changed since the percentiles were established. To our knowledge, no effort has been made to determine whether or not the 2016 score distribution has merit for use with the current model and test cycle, and certainly not for those moving forward. It appears that the only justification for using the specific percentile cut points under consideration is, “This is the way we’ve been doing it.” Interestingly, when adopted for use with the 2016 rankings, these percentiles were not intended to be used going forward, according to the MDE’s own press release from September of 2016: “Once final data are approved by districts and verified by MDE, the numeric values for each grade will be set and they will not change. This way district leaders will always know the target needed to reach a particular grade. The target will not move,” said Dr. Carey Wright, state superintendent of education. “As always, every decision we make is based on what is in the best interest of students, teachers and administrators. We know all schools and districts are committed to helping students achieve the highest possible goals. There is no limit to the number of schools and districts that can earn an ‘A’ or any other grade.”

Recommendation: Any time cut scores must be reset, a fair and just standards-based system of determining baseline score targets for A-F ratings should be established.

1.7 Classifications for schools with grade configurations that include both 12th grade and grades below 9th grade

The Parents’ Campaign agrees with the changes made to this section of the business rules and believes that it will reflect more accurately the performance of students and teachers in schools with both elementary and/or middle school and high school grades.

9.9 For students taking and passing accelerated courses in AP, IB, AICE, or industry certification that have a normed, end-of-course assessment, the numerator will be doubled in weight

We have a continued concern with the acceleration component of the accountability model because we believe the component disproportionately disadvantages low-wealth districts. Parents cannot afford the dual credit tuition, AP exam fees, etc., and school districts cannot afford to bear those costs. Likewise, not all school districts have teachers who have the capacity to teach AP classes, a problem made worse by the teacher shortage crisis, which we know affects some school districts more than others. Preferencing AP, IB, and AICE courses in the model skews accountability results in favor of wealthier school districts and creates the appearance that the accountability model is being manipulated to benefit specific school districts at the expense of others.
Holding schools and districts increasingly accountable for extra programs without providing the resources for those programs creates an unfair system that benefits high-wealth communities while harming low-wealth communities.

15.1 Scores of English learners, counted in participation calculation in first year, with growth added in second year and proficiency added in third year

The changes made to the business rules that apply to English Learners (EL) are an improvement, though areas of concern remain. Inclusion of this component still will create significant disparities in the expectations for districts that have substantial EL populations versus those that do not. The Parents' Campaign acknowledges that this is a federal requirement, and we encourage the MDE staff to continue to seek ways to make the accountability model fair and equitable for all students and teachers in all districts.

The Parents' Campaign believes that public school children, their parents, and our state are best served by an accountability system that reflects high standards and that provides a fair and accurate measure of the quality of education being provided in Mississippi's public schools.

Thank you for considering these comments.

Regards,

Nancy Loome
Executive Director

Cc: Dr. Jason Dean, Chair
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