



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