



March 22, 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 State Board of Education's (SBE's) amended position on the addition of the WorkKeys assessment as an indicator of success in the College- and Career-Readiness (CCR) Component of the Statewide Accountability System.

While The Parents' Campaign strongly supports the addition of WorkKeys to the CCR component, we oppose the change currently being considered by the SBE. The board's modified recommendation, which allows scores at the Gold and Platinum levels as stand-alone career-readiness indicators but requires an industry certification or a career pathway to accompany a Silver-level score, falls short in at least three important ways.

1. **It is inequitable.** Not all career tech areas have industry certifications, so this is not an option for students in many career fields. Additionally, numerous lower-wealth school districts do not have their own Career Tech programs, and their students must participate in career tech courses offered by other school districts via a coalition. Districts without their own CTE programs are subject to coalition agreements that impose limits on the number of career tech slots their districts are permitted, restricting the number of out-of-district students who can participate in the program and the number of courses each student may take. No such caps are imposed on districts that host their own career tech programs. These course participation restrictions limit the number of students in coalition partnerships who can complete a career pathway to accompany a Silver level, while allowing school districts with their own career tech programs an unlimited number of students who can complete the additional requirement. This creates a gross inequity within the Statewide Accountability System.
2. **It reinforces the negative stereotype that the high school career track is inferior to the college prep track.** The MDE argues that the WorkKeys assessment is less rigorous than the ACT and is, therefore, an insufficient measure of career readiness at the Silver level. The MDE staff bases its rigor argument on a limited set of data showing that many career track students who score at the Silver level on WorkKeys do not meet the college readiness benchmark on the ACT. Career track students are not on the college prep track and should not be held to the college readiness benchmarks. The ACT is strictly a college prep assessment and is a completely invalid measure of career readiness. The perception that the industry workforce standard is inferior to the college prep standard is harmful to CTE programs and counterproductive to the goals of public education.

- 3. It ignores the industry standard.** The business community has been unequivocal that a Silver-level score is the standard used by business and industry to determine career readiness. Industry is far better positioned to decide its own standard than is the academic community.

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 the skills they need to be successful. That is precisely what the WorkKeys assessment does.

The MDE staff's assertion that use of the Silver-level score as a stand-alone metric would require a resetting of cut scores is misguided. The staff has predicted that career track students are likely to score better on a career track measure than they have on a college prep measure and that high school and district accountability ratings will improve as a result, a reasonable assumption. What is unreasonable is the assertion that the improved ratings would not be accurate. To the contrary, because the improved ratings would be due to a more accurate measure of career readiness, the ratings will likely be significantly more accurate than previous ratings have been. A reset of cut scores to artificially deflate ratings to bring them into line with a previously flawed CCR measure would be a disservice to students, teachers, and communities statewide.

The Parents' Campaign urges the State Board of Education to modify the business rules in the College- and Career-Readiness component of the Statewide Accountability System 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 students who are enrolled in or have completed at least one CTE course.

Sincerely,



Nancy Loomer
Executive Director