

2ND SUBMISSION OF RECOMMENDATIONS TO THE STATE BOARD OF EDUCATION

“TRANSPARENCY AS A FOUNDATION FOR ACCOUNTABILITY”

BY SOUTHERN ECHO, INC. AND THE MISSISSIPPI DELTA CATALYST ROUNDTABLE
REGARDING THE REVISED LOCAL SCHOOL DISTRICT “REPORT CARD”
TO BE ADOPTED BY THE STATE BOARD OF EDUCATION
– SUBMITTED SEPTEMBER 23, 2009 –

Restatement of Purpose: The proposed Report Card and Guidelines as Revised are intended to provide our communities with sufficient transparency to hold their schools accountable to deliver the quality of education to which our children are entitled. Effective, knowledgeable parent and student engagement with the school district and the schools attended by their children requires a substantial amount of information concerning *both the district and the individual schools*.

Data at the individual school level absolutely necessary: While we appreciate the initial revisions made by the MS Dept. of Education, the revisions are not sufficient. The revisions of the Report Card Guidelines only mandate the provision to parents of *district-wide* data and fail to mandate the disclosure of data at the *individual school level*. School-level data is essential if parents are to have the information needed to understand performance and progress at the schools which are attended by their children. District-wide data does not provide this insight, especially in the districts with more than one elementary, middle or high school.

Examples to illustrate why individual school level data is necessary:

There are so many ways to illustrate why data on *individual schools* is as necessary as *district-wide* data. For example, parents have the right to know whether *student performance on standardized tests* is higher at other schools in the district, or at other schools in comparable districts. With this information they can make appropriate inquiry with the district administration and local school administration and teachers as to the reasons for these differences. This data will enable parents to work with other parents and educators to effect needed changes to improve the outcomes within the schools which their children attend. This is exactly the highly desirable kind of parent involvement described in all studies as essential to the turnaround of schools. But if parents are not provided the necessary data at the individual school level they will not have the tools with which to engage effectively with the district and individual schools which their children attend.

For another example, under *No Child Left Behind*, if a school is “failing”, parents have the right to send their children to schools within the same school district that are not “failing”. Such individual school information is not provided under the proposed Guidelines. The data requested below about individual schools is critically important to parents to assist them to understand what their choices among schools may be, and the factors they need to take into account to assess whether a change in schools would be appropriate for their child or children.

The data we are requesting is already available and creates a minimal burden: Our view is that the highest value in this process is that we create a framework for transparency as a foundation for accountability, not that we produce a product that can fit on a single sheet of paper. The information included in our 14 itemized requests (see below) is data which the school districts and individual schools already compile and, therefore, is not an undue burden on their administrative staffs. Parents need effective access to all of this information to be effectively engaged and to hold districts and schools accountable.

Mandatory Guidelines are needed rather than mere voluntary compliance: We are requesting that the changes proposed herein to the Report Card and Guidelines ought to be made mandatory, not merely voluntary. Our experience is that unless the Guidelines are mandatory some local school districts will not provide the information at all, or will charge prohibitive fees to parents for providing such information.

Procedures under APA: The following recommendations, submitted pursuant to the Administrative Procedures Act, are intended to expand and improve the content and availability of the proposed new Report Card. Also, pursuant to the Administrative Procedures Act, we are requesting a *public hearing*.

Our 14 recommendations are:

Recommendation #1: Mandatory: The *ratings of individual schools* ought to be included in the Report Card so that parents can know the ratings of individual schools within the district. While this may make it difficult to include all of this information on a single page, it is more important that parents and students have this information to assist their engagement with the schools than to have a Report Card that is only one page long.

Recommendation #2: Mandatory: The Report Card should include a *profile of each individual school*, similar to the profile for the district as a whole. Parents and students need to have access to this information to understand which individual schools are doing well, and which are not. This information needs to be published in the newspaper, available in hard copy from the school district, and should also be posted on the school district website and the website of the State Dept. of Education. For example, if the district graduation rate is 70 percent overall, it is also important to know the graduation rate for each individual high school within the district.

Recommendation #3: Mandatory: There should be a breakdown of the *racial composition* of the staff (teachers, administrators and support personnel) for the entire school district and for each individual school. The Report Card revisions recently adopted by the State Board of Education provide the racial composition for the student body, but do *not* provide the racial composition for the faculty, administrators and personnel. This is important information that helps people in the community understand employment patterns and the patterns of assignment of employment to the individual schools. Employment patterns are regulated both by federal law and by federal court school desegregation orders. Accurate data would help community people get beyond impressions to actual numbers. Transparency minimizes misunderstanding and confusion, on the one hand, and assists to ensure accountability, on the other hand.

Recommendation #4: Mandatory: In the profiles of the district and individual schools the itemizations ought to include both *actual numbers as well as the percentages*. In this way parents and students can understand how many individuals are involved, as well as the percentage represented. For example, if it is important to know that the graduation rate is 70 percent, it is also important to know how many students that percentage represents.

Recommendation #5: Mandatory: The goal is to promote transparency and understanding among parents and students. This cannot be done effectively if the terminology used in the Report Card is not well understood by those who are reading it. The Report Card is not aimed at “insiders”, but the general public. Therefore, it is essential to include in the Report Card a *glossary of terms* that define key terms such as:

- a. Quality Distribution Index,
- b. “highly qualified”,
- c. “national board certified”,
- d. “emergency/provisional teachers”,
- e. “graduation rate”,
- f. “completion rate”
- g. “dropout rate”, and
- h. each of the terms used in the profile of school revenues and expenditures, and in the budget profile, including such items as “millage”, “assessed value”, etc.

At the State Board of Education meeting on Wednesday, Sept. 16, 2009 one Board member lifted up the necessity of providing an effective explanation of acronyms and terms in the Report Card data so that the ordinary non-professional reader can understand the content of the Report Card data. MS Dept. of Education staff committed to providing a glossary of terms. However, this commitment needs to be written into the Guidelines as mandatory so that it does not get mis-interpreted in future years as a merely voluntary element that can be dispensed with as not having been required.

Recommendation #6: Mandatory: It is important that parents and students understand the degree of success of students on standardized tests in the *district as a whole*, and in *each individual school*. Therefore, the Report Card ought to include a breakdown by numbers and percentages of the *Mississippi Curriculum Test (MCT)* and the *Subject Area Testing Program (SATP)*. For the MCT the breakdown ought to set forth the breakdown of scores by numbers and percentages of students in the 4 primary scoring categories, and for the SATP by the numbers and percentages of students who passed or failed the 4 primary subject areas.

Recommendation #7: Mandatory: The Report Card ought to include data that apportions to both school district and to each school within the district the *actual federal, state and local dollars* allocated, and the percentage for each category of use, such as “instruction”. This data is already encoded by individual schools in the school district budget matrix. This is the kind of information parents and students need to participate in the school budgeting process each year.

Recommendation # 8: Mandatory: The Report Card ought to include data that discloses how *Title I funds* are expended at the local school district level. In addition, the Report Card ought to provide the names of each member of the *Title I Parent Involvement Committee*. This is public information and will enable parents to reach out to their representatives on the Parent Involvement Committee to find out how Title I funds are being used, and how parents can become more involved in the Title I activities and process.

Recommendation #9: Mandatory: The Report Card ought to include as an attachment to the Report Card the *Consolidated Federal Program Report* and any *Corrective Action Plans* adopted by the district in response to the Consolidated Federal Program Report. This information is important to enable parents to understand what actions are being taken by the district to improve so that parents can determine whether the necessary steps are being undertaken and how parents can assist to expedite compliance with Corrective Action Plans.

Recommendation #10: Mandatory: In the Report Card the district profile of revenues and expenditures should include *dollar amounts as well as percentages* and the amount of the *fund balance* or *reserve fund* should also be included in the profile.

Recommendation #11: Mandatory: In the Report Card the district profile ought to break down the district's *federal dollars* by the different categories through which the funds are received, and the different categories for how the federal dollars have actually been expended.

Recommendation #12: Mandatory: The Report Card ought to include under student data more information than just the number of suspensions and expulsions for the district. In addition to those items the Report Card also ought to provide the following information about *student disciplinary practices* for *both the district as a whole* and *for individual schools*:

- a. the number of incidents of students assigned to in-school and out-of-school suspensions,
- b. the number of students who have been expelled,
- c. the number of incidents of paddling and the number of student who have been hit with a paddle by a school employee,
- d. the number of incidents of disciplinary referrals,
- e. the number of students who have received alternative school referrals, and
- f. the number of students who have received juvenile court referrals.

This information is necessary to enable parents to assess whether individual schools within a district or in other districts are using substantially different policies and strategies to deal with children who are experiencing behavioral difficulties. It is also important to enable parents to assess whether local districts are in compliance with federal and state laws and regulations and local school district policies with regard to the use of individual assessments, positive behavior intervention supports, conflict resolution, Teacher Support Teams and new Response to Intervention regulations rather than beating students or removing them from the mainstream classrooms where the work of education is taking place. District wide data is helpful, but insufficient to provide the information needed by parents to hold their individual schools accountable.

Recommendation #13: Mandatory: The Report Card, under teacher data, ought to identify the number of occasions that the *Teacher Support Team (TST)* or *Response to Intervention (RTI)* process has been invoked.

Recommendation # 14: Mandatory: The new Guidelines ought to be clear that each school district must provide at its central office *free hard copies of the full Report Card data*, which shall include the *local school data* as well as the *district-wide data*. This is the only way that we can ensure transparency for those who do not have internet access. By the same token, we want to make sure that all schools are required to provide the local school data for the website for those who have internet access, but do not have transportation.

Submitted September 23, 2009 by:

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