



Comments – Fifth Cycle MSIP Standards and Indicators

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The Missouri School Boards' Association is a private, nonprofit organization whose mission is to help public schools succeed. We work closely with boards and superintendents on most of the practices covered in these standards and understand that strong standards are an effective tool for school district success. On behalf of public schools, MSBA submits the following comments for consideration.

Generally

1. The standards make reference to “all students,” but the revised ISLLC (now ELPS) Standards use “every student.” This is a small but important distinction that more specifically holds districts accountable.

2. The standards frequently use “which” when “that” is the appropriate word (Performance Standards (K-8) 1.3, (K-12) 1.3; Standards 7.4, 10.1, 13.2 (first “which” only), 19, 23.5, & 24.10. These should all be changed to “that.” In addition, the explanation of practical arts and the explanation of sharing administrators (options 1 and 2) should be changed.

3. Some standards have the district responsible for actions when it would be more appropriate for the board of education, district leadership or both to be the responsible parties.

MSBA has included these changes within our recommendations.

4. As the introduction notes, these standards and indicators represent the state’s vision and expectations for a quality school. As such, many of the compliance-oriented standards and indicators have been removed. Our experience has been that boards and administrators, especially new board members and new administrators, have looked to the standards and indicators for compliance guidance. Many of these details will be included in the Report Writing Form. However, new board members and new administrators may not be familiar with that document.

MSBA recommends that this document be accompanied by references to other resources such as the Report Writing Form, Professional Development Guidelines, General Administrative Procedures for Gifted Programs, etc., that will assist the district in meeting the standards.

Introduction

MSBA's Recommendation: The last sentence of the introduction should read "This plan will guide the district in decision-making about the Process and Resource Standards and, if properly designed and implemented, will lead to higher student performance."

Performance Standards for K-8 Districts

1. This performance standard references the End of Course assessments that are part of the MAP. However, very few K-8 students will actually participate in EOC assessments.

MSBA's Recommendation: "The district administers assessments required by the Missouri Assessment Program (including MAP grade level assessments and End of Course assessments as applicable) to measure . . . over time."

Performance Standards for K-12 Districts

1. Standard 2 - The district adequately prepares students for success on the ACT.

MSBA's Recommendation: "The district adequately prepares students for success on the ACT/SAT"

Instructional Designs and Practices

1. Standard 11 - High quality fully integrated career education is available to all secondary students.

MSBA's recommendation: Change "all secondary students" to "each secondary student."

2. Indicators four and five reference career and technical student organizations and require local CTSO's to affiliate with state and national organizations. School districts should not have to affiliate with state and national organizations to meet basic accreditation standards. While these organizations have value, other student organizations have value as well but should not be required as part of the MSIP process.

MSBA recommends combining indicators four and five and removing the requirement for state and national affiliation. “If offered, career-focused student organizations are active and support the curricular program.”

Instructional Support

Standard 13

1. Indicator 13.2 requires discipline procedures that “ensure” the safety of students, including students traveling to and from school. It is difficult enough to “ensure” the safety of students during the school day, and nearly impossible to “ensure” the safety of students as they travel to and from school. A more realistic indicator would be that the district implements appropriate measures that promote the safety of students.

While several of the standards use the word ensure, (Performance Standards 4 and 5 and Leadership and Governance Standards 22, 24, 25, 26 and 27) those standards primarily focus on the process of student learning. This standard is about physical safety. MSBA is concerned that by asking districts to promise that no harm will ever come to a student, the DESE may be exposing school districts to additional liability.

2. In the first sentence, “which” should be replaced with “that” and school-sponsored is more correctly “district-sponsored.”

MSBA’s Recommendation: “A written code of conduct that specifies acceptable student behavior, consequences and discipline procedures and that includes appropriate measures to protect the safety of students to and from school, during school and during district-sponsored activities is distributed to staff, parents and students.”

Standard 16 - The district identifies and provides effective support systems for students who may be at risk of school failure.

1. Indicator 16.1 states that “a written process” is in place for the early identification and implementation of all types of supports for students at risk of school failure. The original language called for a process that “included written procedures.” This document regularly uses procedure rather than process to describe an indicator. Unless the intent is for a written process to be distinct from a written procedure, the language should remain consistent.

2. Additionally, the indicator requires this process to identify and implement “all types of supports.” Perhaps the intent was not to require any district to cover all types of supports but to require districts to use a variety of types of supports.

MSBA’s Recommendation: “The district has written procedures in place for the early identification of students who may be at risk of school failure and implements multiple types of support for identified students.”

3. Indicator 16.5 directs the district to work with community partners to address “academic, physical and mental health barriers” impacting student success. Rather than list the types of barriers that might need to be overcome, MSBA recommends that the indicator remain broad and simply use “barriers.” By creating a list, the indicator may leave out an important type of barrier. For example, it is not clear whether lack of encouragement or low expectations at home is academic, physical or mental.

MSBA’s Recommendation: “The district, through collaboration with community partners, provides learning and behavioral supports to identify and address barriers impacting student success.”

Standard 17 - As written, this standard simply requires offering a program but does not address the quality or purpose of that program.

MSBA’s Recommendation: “High quality preschool educational activities or programs that contribute to improved student achievement are available to the district’s children.”

Standard 18

1. Indicator 18.1 is limited to one program when there are many that require parent involvement.

MSBA’s Recommendation: “Parent education activities are provided as required by law, including but not limited to the Early Childhood Development Act, Individual with Disabilities Education Act, Title I, Title III and Title IV.”

2. Indicator 18.2 requires the district to work with “agencies or school groups.” The term “school groups” is not clear and the examples provided are a mix of school-run programs and community-based programs.

MSBA’s Recommendation: “The district actively cooperates with other agencies and groups to provide information related to child development or parenting skills.”

Leadership and Governance

Leadership and governance is a welcome new section for the standards. However, the focus of these new standards may need to be sharpened. It appears that previous standards not included elsewhere were included in this section even though they do not directly relate to either governance or leadership, at least as written. Safe facilities (24.7 and 24.8), financial management (24.5), data reporting (24.6), coordinated health services (24.9), food services (24.10) and transportation (24.11) are all important functions. However, none of the standards addressing these issues ties them to improved student learning. Therefore, a district could be frugal, efficient and safe but not be providing leadership. It is possible that the drafters, knowing the importance of these functions simply presumed the link to student learning would be obvious. However, MSBA is concerned that unless the focus of these standards is adjusted so that the measurement is based on how being (safe, fiscally responsible, etc.) improves student learning, these standards will become simple checklist items.

Standard 21

The standard only requires that the policies reflect statutory law. There are many sources of law besides statutes. The board of education does not develop written procedures; that is an administrative function.

MSBA's Recommendation: "The board of education has adopted a current set of policies, meets regularly and has secured the required training for its members."

1. Indicator 21.2

MSBA's Recommendation: "Policies and procedures guide board and district leadership decision-making, meet federal and state requirements, are reviewed on a regular basis and reflect current requirements."

2. Indicator 21.3 requires that the board make "records of open meetings available for public review." Actually records of some closed meetings eventually become open for public review and there are other records not associated with meetings that should be made available to the public.

MSBA's Recommendation: ". . . and makes the records available for public review in accordance with Missouri law."

3. Indicator 21.4 does not follow the same wording convention as other standards.

MSBA's Recommendation: "Members of the board of education elected or appointed after August 1993 have completed sixteen (16) hours or more of orientation and training within one (1) year of their election or appointment conducted by a State Board of Education approved organization."

Standard 23

Indicator number one requires a written procedural plan, approved by the board of education, which coordinates the evaluation of all programs and services.

As the leader in promoting school board governance, MSBA is sensitive to the division between governance and management. This division is commonly represented by the use of board-adopted policy and administrative procedures that are not adopted by the board. This indicator requires the board to adopt a procedure, which blurs the distinction.

MSBA's Recommendation: "District leadership has developed written procedures that coordinate the evaluation of all programs and services and provided a copy of the procedures to the board."

1. Indicator 23.3 requires "the district" to conduct surveys. This is an administrative function.

MSBA's Recommendation: "District leadership conducts regular surveys . . . programs and services."

2. Indicator 23.4 requires opportunities for parents, patrons and others to serve on committees but does not include reference to how notice about those opportunities is publicized.

MSBA's Recommendation: "Patrons, parents, staff and students are informed of and have opportunities to serve on . . . programs and services."

Standard 24 - The district ensures the success of all students by managing organizational systems and resources for a safe, high-performing learning environment.

This standard and some of its indicators use "district" rather than referencing the leadership team.

MSBA’s Recommendation: “The board of education and district leadership ensure the success of every student by managing organizational systems and resources for a safe, high-performing learning environment.”

1. Indicator 24.1

MSBA’s Recommendation: “The board of education and district leadership use information systems . . . student performance”

2. Indicator 24.2 “District staff use documented evidence (e.g., observations, walkthroughs, collaborative teams, mentoring, and adult learning strategies) to develop professional growth plans.”

There is no governance connection in this indicator. Further, this standard does not address evaluation. Evaluation should be included somewhere.

MSBA’s Recommendations: “District leadership use documented evidence (e.g., observations, walkthroughs, collaborative teams, mentoring, and adult learning strategies) to develop professional growth plans focused on improving student learning.”

Add an indicator – “Teachers and administrators are evaluated using a performance-based evaluation tool based on standards that promote student learning.”

3. Indicator 24.3 requires the board of education to employ staff members “in accordance with statutory requirements.” Unless the intent is to limit the board’s obligation only to those requirements imposed by statute, the standard should be modified to be more inclusive.

MSBA’s Recommendation: “The board employs staff members in accordance with legal requirements and local employment policies and procedures.”

4. Indicator 24.4 requires the community, through the board, to provide sufficient financial resources to ensure an educational program of quality. These are standards that guide the performance of boards and administrators, not the community. How can the community be held accountable? Also, it is not clear how the community works “through the board.”

MSBA’s Recommendation: “The board of education and district leadership works with the community to secure sufficient financial resources to support a high quality educational program for students.”

5. Indicator 24.5 requires the board and administration to be efficient managers of finances, but does not tie this fiscal responsibility to the educational process. As written, a district could meet this standard by being efficient and diligent but not using those financial resources in a way that benefits students. Further, the standard uses “administrators” rather than “district leadership,” which is inconsistent with previous standards and indicators.

MSBA’s Recommendation: “The board establishes policy and district leadership implements procedures for efficient fiscal management and responsibility that support the district’s CSIP.”

6. Indicator 24.6 requires the district to accurately make reports in a timely manner but does not tie that reporting to student learning. Understandably, the DESE must have data in a timely matter. However, the purpose of MSIP standards is to improve student learning, not to enforce rules. This standard is about compliance, not improvement. Perhaps this could be part of the report writing form for standard 19 or 23.

MSBA’s Recommendation: Unless there is a link between on-time filing and student learning, this standard should not be included in governance standards.

7. Indicator 24.7 requires the district to have facilities that are healthful, adequate in size, clean, well-maintained and appropriate to house the educational programs of the district but does not tie that reporting to student learning. The standard should include a link between facilities and student learning.

Similarly, Indicator 24.8 requires the district to “ensure its facilities are safe.”

Why is this standard separate? Why not include safety in 24.7?

Further, there are concerns here similar to those with standard 13.2. MSBA recognizes that the goal is to provide safe facilities. However, these are standards, not goals. If the state expects and the board guarantees a completely safe facility, any breach, even one out of the control of the board, could be seen as a failure to meet the standard.

Finally, the standard uses “district” rather than “board of education and district leadership.”

MSBA’s Recommendation: “District facilities are designed, maintained and used to improve student learning.”

8. Indicator 24.9 requires a coordinated approach to school health services.

In the past all documentation associated with this standard was geared to health services for students. If the intent of a coordinated school health program is to benefit staff, community and those other than students, the supporting documentation should be expanded. If the purpose of a coordinated school health program is to benefit students, the standard should be clear. Further, the standard does not tie a coordinated school health program with student learning.

MSBA's Recommendation: "The board of education and district leadership have implemented a coordinated approach to school health services that focuses on services that have been demonstrated to improve student learning."

9. Indicator 24.10 requires the district to have a food program available to students but does not tie the program to leadership functions.

MSBA's Recommendation: "The board of education and district leadership have implemented a food program that meets all legal requirements and focuses on those aspects of the food program that have been demonstrated to improve student learning."

10. Indicator 24.11 requires the district to have a transportation program available to students but does not tie the program to leadership functions. The purpose of MSIP standards is to improve student learning, not to enforce rules. This standard is about compliance, not improvement.

MSBA's Recommendation: Unless this standard can be tied to governance or district leadership functions, it should be removed. Perhaps it could be part of the report writing form for standard 13 or 23.

Standard 25

MSBA's Recommendation: Replace "all students" with "every student."

1. Indicator 25.2 requires the district to have "procedures" to involve community members in educational activities. The indicator does not state whether these procedures must be written. If "procedures" in this context does not mean written procedures, the word "procedures" should be replaced with strategies. If written procedures are expected, the word "written" should be inserted prior to procedures.

MSBA's Recommendation: "The board of education and district leadership have strategies to involve community members in educational activities." OR "District leadership has written procedures to involve community members in educational activities."

Standard 26 - The board of education, district leadership and staff ensure the success of all students by being ethical and acting with fairness and integrity.

1. This standard is more likely to *contribute to* rather than *ensure* student success.
2. Indicator 26.1 refers to a “professional” code of ethics for all employees. It is not clear exactly what constitutes a *professional* code of ethics. Is it one drafted by an organization or can the district develop its own code?
3. Indicator 26.3 requires that the district have written policies and procedures in place to ensure the respect of individual rights. No policy can ensure respect. A policy can only create a framework and a mechanism for enforcement that promotes respect. Additionally, the phrase “individual rights” is very broad. It is unclear whether the indicator is referring to legally protected rights or something more general. This indicator should be explicit about the source of the individual rights at issue.

MSBA’s Recommendation:

26. “The board of education, district leadership and staff contribute to the success of every student by being ethical and acting with fairness and integrity.

1. The board of education has adopted, and the district leadership enforces, a code of ethical conduct for all employees.

2. No change

3. The board of education has written policies that identify promote and protect legally established individual rights, and these policies are consistently implemented by district leadership.”

Standard 27

This standard uses “district” rather than “board and district leadership” and does not tie directly to the governance goal of improved student learning. The fourth indicator also requires district leadership to “implement processes,” which is inconsistent with the other standards. “Processes” should be replaced with “strategies” or “procedures.” If the procedures must be in writing, that should be specified as well. “All students” should be replaced with “every student.”

MSBA’s Recommendation: “The board of education and district leadership collaborate with state and local agencies and organizations that share responsibility for or whose programs contribute to, the physical or mental health, safety and welfare of students and improve student learning.

27.1 The board and district leadership identify and advocate for policies and programs that promote equitable learning and success for every student . . . individual characteristics.

27.2 The board and district leadership collaborate with community leaders . . . and organization.

27.3 The board and district leadership accurately communicate data . . . community decisions.

27.4 District leadership implements strategies to facilitate regular collaboration . . . timely manner.”

The MSBA Special Education Advocacy Council (SEAC), comprised of 16 persons with significant history in public school administration, state department of education and social services, and school law and policy, convened a meeting to review the 5th Cycle MSIP Standards. In addition to the above comments, the SEAC submits the following comments for consideration:

Comment: Our understanding is that these standards apply to every child, including children with disabilities. Other than two references, it appears that students with disabilities are missing all together. Although we have made significant strides as a state in improving academic outcomes for students with disabilities as evidenced by demonstrated gains on the MAP assessment, we must continue to overtly point the way.

MSBA’s Recommendation: Include in the introduction or other appropriate place(s), a specific statement that students with disabilities are included in the standards.

This document of standards outlines the state’s vision and expectations for a quality school. Expectations are described in a non-prescriptive way so each school district has the flexibility and responsibility to explain how it provides quality education to every student, including students with disabilities and other special learning needs. (Page 10, second paragraph)

Comment: Under federal laws, such as IDEA and NCLB, curriculum and professional development must be scientifically research based or based on good evidence.

MSBA’s Recommendation: We recommend that the 5th Cycle MSIP Standards specifically define where available “research-based,” “best practices,” and “good evidence” and incorporate them as part of the standards, where applicable.

Comment: Today more than ever before, students with significant mental health needs are attending public schools. Student achievement and the safety and well-being of all staff and students are enhanced with an increase in awareness and education of staff and students regarding mental health and wellness.

MSBA's Recommendation: Expand all references to “health” to read “physical and mental health and wellness”. Address mental health and wellness in appropriate standards for professional development of staff as well as under health curriculum for students.

Comment: (Standard 18.3, page 17)

A high level of parent/guardian engagement is one of the strongest indicators of student success, significantly diminishing other potential at-risk factors such as disability and poverty. The specific formal strategies contained in 18.3 (a)(b)(c)(d)(e) point districts in a clear direction for how to involve parents at multiple levels, providing parents opportunities to actively engage in their student’s learning.

MSBA's Recommendation: We strongly encourage that the strategies remain under 18.3. If removed from the standard, there is no other ready source to provide guidance to districts.

Comment: We appreciate the non prescriptive manner in which the 5th Cycle Standards and Indicators are structured to allow each district the “flexibility and responsibility to explain” how their district is meeting the standards. However, we know pragmatically that the removal of the strategies may prove detrimental to overall student achievement as the guidance afforded by prior listing of specific strategies will no longer be contained in one concise document.

MSBA's Recommendation: Please carefully consider which strategies can be removed to afford more flexibility and which strategies may continue to provide much needed direction in order for every student in Missouri schools to reach new levels of student achievement. This needs to be considered in light of the great diversity among districts in Missouri in terms of personnel and resources available to engage in the MSIP process.

Thank you for the work reflected in this document and all the efforts by DESE to help public schools succeed. Questions about any of these comments may be directed to Kelli Hopkins, Associate Executive Director, MSBA or Kim Ratcliffe, Associate Executive Director, Special Services and Chairperson, SEAC.

Submitted by:

Dr. Carter Ward, Executive Director
Missouri School Boards’ Association