

**Joint Legislative Committee on Performance
Evaluation and Expenditure Review (PEER)**

Report to
the Mississippi Legislature



A Limited Review of the Mississippi Department of Education's Central Office Staffing

In a 2010 report, *Opportunities for Improving the Accountability of the Mississippi Department of Education*, PEER recommended that the Mississippi Department of Education (MDE) assess its Central Office staffing in relation to departmental workload and long-range plans for educational improvement, particularly in the area of improving instruction. PEER conducted this 2012 review to follow up on that recommendation.

According to PEER's analysis of multiple sources, MDE's efforts toward improved student learning should be focused on providing leadership in the areas of improved instruction and effective use of data in decisionmaking at all levels in the education system.

Within the past year, MDE has increased the alignment of its staff with these strategic priority areas. However, MDE is in a transition phase and has not yet achieved the level of alignment needed to be best positioned for the future of education. In the offices PEER reviewed, resources are generally assigned to process-related tasks that do not have a clear link to the strategic priorities. Because MDE has not yet allocated a sufficient number of staff to work toward achievement of its strategic priorities, the department has relied on contractors to perform key responsibilities related to those priorities but has not specified in these contracts the necessary performance requirements. In some cases, MDE staff plan to assume the responsibilities of contracted staff in the future.

MDE has several opportunities to align its staff with the strategic priorities identified in this report. These opportunities will require MDE's upper management and Office of Human Resources to make staffing decisions based on achieving MDE's strategic priorities. These opportunities are: practice strategic human resource management; classify and compensate employees appropriately; reallocate support positions based on needs; shift the focus of the role of the Office of Educational Accountability; and, fill staff skill gaps in pedagogy and data analysis to staff the department for improving instruction and using data effectively.

December 11, 2012

PEER: The Mississippi Legislature's Oversight Agency

The Mississippi Legislature created the Joint Legislative Committee on Performance Evaluation and Expenditure Review (PEER Committee) by statute in 1973. A joint committee, the PEER Committee is composed of seven members of the House of Representatives appointed by the Speaker and seven members of the Senate appointed by the Lieutenant Governor. Appointments are made for four-year terms, with one Senator and one Representative appointed from each of the U. S. Congressional Districts and three at-large members appointed from each house. Committee officers are elected by the membership, with officers alternating annually between the two houses. All Committee actions by statute require a majority vote of four Representatives and four Senators voting in the affirmative.

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The Committee assigns top priority to written requests from individual legislators and legislative committees. The Committee also considers PEER staff proposals and written requests from state officials and others.

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December 11, 2012

Honorable Phil Bryant, Governor
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Honorable Philip Gunn, Speaker of the House
Members of the Mississippi State Legislature

On December 11, 2012, the PEER Committee authorized release of the report entitled **A Limited Review of the Mississippi Department of Education's Central Office Staffing.**

A handwritten signature in black ink, appearing to read "Gary Jackson", with a long horizontal flourish extending to the right.

Senator Gary Jackson, Chair

This report does not recommend increased funding or additional staff.

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A Limited Review of the Mississippi Department of Education's Central Office Staffing

Executive Summary

Introduction

In PEER Report #539, *Opportunities for Improving the Accountability of the Mississippi Department of Education* (September 24, 2010), PEER recommended that the Mississippi Department of Education (MDE) assess its Central Office staffing in relation to departmental workload and long-range plans for educational improvement, particularly in the area of improving instruction. In 2012, the former State Superintendent of Education requested that PEER conduct a third-party review to follow up on the recommendation to assess staffing.

In performing this review, PEER sought to answer the following questions:

- What are MDE's strategic priorities related to improved student learning?
- To what extent has MDE aligned its Central Office staff with the strategic priorities?
- How could MDE better align its staff with its strategic priorities?

What are MDE's strategic priorities related to improved student learning?

According to PEER's analysis of multiple sources, MDE's efforts toward improved student learning should be focused on providing leadership in the areas of improved instruction and effective use of data in decisionmaking at all levels in the education system.

Need to Provide Leadership in Improving Instruction

MDE's goals and responsibilities, influence from the federal government, districts' needs, and educational research suggest that improved instruction is a priority area for the education system. Specifically, the alignment of instruction to the standards and assessments is critical to improve student learning.

Two of MDE's three system goals focus on increases in student learning. One of MDE's strategies for achieving these goals includes implementation of reform in the area of instruction, along with other critical pieces associated with student learning (i. e., curriculum, assessments, and accountability systems).

The State Superintendent of Education is responsible for identifying educational needs to serve as a basis for short-range and long-range planning. Mississippi has a clear need for increased student learning and instruction is a critical element. Accordingly, MDE has the statutorily mandated responsibility for managing an instructional program in the state.

Based on federal requirements, school districts' needs (according to PEER interviews), and professional literature, improved instruction and its alignment to standards and assessments is critical:

- The U. S. Department of Education has provided waivers to several states, including Mississippi, regarding the No Child Left Behind requirement that every student be proficient in math and English by 2014. In order to receive the waiver, states were required to explain how they planned to increase the quality of instruction for all students.
- In interviews with districts' staffs, PEER found that a common need was for technical assistance in the area of curriculum and instruction.
- Scholarly literature in the field of education shows that instruction is key to improved student learning in standards-based reform.

Need for Effective Use of Data in Decisionmaking

MDE's goals and responsibilities, influence from the federal government, districts' needs, and educational research also suggest that effective use of data in decisionmaking at the state, district, school, and teacher levels is a priority area for the education system.

Analysis of MDE's system goals requires effective use of data to determine where the education system is in relation to the goals and where resources might be needed. Two of MDE's strategies for achieving the system goals refer to increasing the quality of teachers and administrators; data analysis is required to determine whether MDE is on track regarding these strategies.

The State Superintendent of Education has the statutorily mandated responsibility of using and analyzing data, information, test results, evaluations, and other indicators to formulate policy and identify educational needs for both short-term and long-term planning. Also:

- The current federal education reform initiative “Race to the Top” focuses heavily on using data to measure student learning, support decisionmakers in improvement areas, and improve instruction.
- In interviews with districts’ staffs, PEER found a common need for clear and timely analysis of accountability data, as well as sharing more information on “what works” in education.
- Scholarly literature in the field of professional education shows that data analysis significantly improves the quality of decisionmaking, which can ultimately increase student learning.

To what extent has MDE aligned its Central Office staff with the strategic priorities?

Within the past year, MDE has increased the alignment of its staff with the strategic priority areas of improved instruction and effective use of data statewide. However, MDE is in a transition phase and has not yet achieved the level of alignment needed to be best positioned for the future of education. In the offices PEER reviewed, resources are generally assigned to process-related tasks that do not have a clear link to the strategic priorities. Because MDE has not yet allocated a sufficient number of staff to work toward achievement of its strategic priorities, the department has relied on contractors to perform key responsibilities related to those priorities but has not specified in these contracts the necessary performance requirements. In some cases, MDE staff plan to assume the responsibilities of contracted staff in the future.

Improvements in MDE Central Office Staffing Related to Improved Statewide Instruction

Within the past year, MDE has added two content specialists in English/language arts and mathematics to its staff to fill critical skill gaps. In December 2012, another content specialist position will go before the State Personnel Board for approval.

Limited Number of MDE Central Office Staff Assigned to Improved Statewide Instruction

While staffing improvements have been made in the area of instruction, PEER determined that only one percent of positions at MDE is specifically tasked with improving classroom instruction in all of the state’s school districts. Because MDE has allocated the majority of its resources to other areas, MDE has limited its own impact in the priority area of improved instruction, particularly the deep level of implementation necessary for increased student learning to occur.

MDE content specialists provide services to districts' and schools' staffs in curriculum and instruction support. However, because MDE has not allocated more resources to curriculum and instruction, MDE has not provided the technical assistance that districts need (e.g., in-depth professional development regarding Common Core).

Improvements in MDE Central Office Staffing Related to Use of Data

Within the past year, MDE has focused staffing efforts on improved data quality and easier access to data. Such efforts are critical, as they provide the foundation for effective use of data for decisionmaking in the future.

MDE's efforts to improve data quality and accountability include giving staff responsibilities for implementing proper documentation and data coding practices, contracting for development of a complete business intelligence system, and developing an appeals process for districts that question accountability data.

MDE's efforts to improve access to data include creating an Office of Reporting responsible for streamlining federal and state reporting, along with other information requests. Also, when the Office of Management Information Systems assumes responsibility for the business intelligence system in development, the system should provide easier access to data for reporting and analytical purposes.

Focus on Improving Accountability Data

In May 2012, the State Board of Education established an Accountability Task Force to review and make recommendations to simplify and improve the accountability model. This effort should provide for more clear and timely analysis of accountability data for districts.

Limited Number of MDE Central Office Staff Assigned to Statewide Effective Use of Data

MDE staff have primarily been focused on improving data quality for reporting or accountability purposes but have not achieved the level of staffing needed to address what the data means and how it all fits together to answer "big picture" questions. MDE lacks staff with the skill sets needed for analyzing data in order to make improvements in student learning statewide and to provide tools needed to support data-driven decisions by schools and districts. MDE has launched two promising initiatives for supporting school improvement through effective use of data (longitudinal databases and the eScholar business

intelligence system) that will require MDE to ensure that it has the in-house expertise to utilize these systems and adequately monitor associated contracts.

MDE Often Focuses on Process as Opposed to Educational Improvement

In the offices PEER reviewed, staff spend more time focusing on questions from districts and other stakeholders related to processes rather than focusing on how to improve education statewide. This is likely due to the frequency of changes in educational standards and programs. However, this condition also points to a need for MDE to find more efficient ways to communicate process information to districts, schools, and teachers so that Central Office staff can focus on strategic priorities to improve the education system.

MDE's Contractors Perform Critical Functions, Sometimes Without Sufficient Accountability

Use of Contractors to Perform Critical Departmental Functions

Although MDE's long-term needs include skills related to data, measurement, and evaluation throughout the education system, MDE has relied on contractors to perform critical functions in related areas such as the accountability model and school improvement evaluations. Because the department uses contractors to compensate for insufficient in-house skills in these areas, such contractors should be monitored carefully to assure that they are achieving the desired outcomes.

Insufficient Accountability for Contractors' Work in the Area of School Improvement

MDE does not always hold contractors accountable for producing desired results in the area of school improvement. In the seventy-three FY 2013 contracts related to school improvement that PEER reviewed, none defined performance requirements of the work in measurable, mission/objective-related terms. Also, contracts did not include quality assurance plans or incentives for better quality performance.

How could MDE better align its staff with its strategic priorities?

MDE has several opportunities to align its staff with the strategic priorities identified in this report. These opportunities will require MDE's upper management and Office of Human Resources to make staffing decisions based on achieving MDE's strategic priorities.

These opportunities are:

- *Practice Strategic Human Resource Management*--MDE's Office of Human Resources and upper management should practice strategic human resource management so that the optimal number of people with the necessary knowledge and skills are in place to accomplish MDE's mission and goals. For example, MDE should consider eliminating any currently vacant position that does not have a direct impact on the priority areas identified in this report.
- *Classify and Compensate Employees Appropriately*--MDE should classify and compensate its employees appropriately based on their levels of responsibility and the skills needed to perform job duties successfully.
- *Reallocate Support Positions Based on Needs*--MDE should take advantage of ways to cross-train and reallocate support positions across the agency based on needs.
- *Shift the Focus of the Role of the Office of Educational Accountability*--MDE's Office of Educational Accountability should shift its focus from financial accountability to increased accountability for MDE programs and resources, as required by state law.
- *Fill Staff Skill Gaps in Pedagogy and Data Analysis*--MDE should continue transitioning its staff's skill sets toward improving instruction and using data effectively in order to shift focus to strategic priority areas and be prepared for the future in education.
 - *Staffing for Improved Instruction*--MDE's efforts to improve instruction should include a larger team of pedagogy experts in all major curriculum areas. These experts should be involved in a range of activities to improve alignment of instruction with the standards and assessments.
 - *Staffing for Effective Use of Data*--MDE's efforts to use data effectively should include a team of researchers and data analysts responsible for a statewide research agenda, longitudinal databases, and ensuring that analytical tools are available to

improve decisionmaking in the areas of instruction and student learning.

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A Limited Review of the Mississippi Department of Education's Central Office Staffing

Introduction

Authority

The PEER Committee reviewed the Mississippi Department of Education's Central Office staffing. The Committee acted in accordance with MISS. CODE ANN. Section 5-3-51 et seq.

Problem Statement

Mississippi students' results on national and state assessments imply that many of these students do not have the knowledge they need in order to compete with students from other states or other parts of the world. For example, an average of fifty-three percent of third grade through eighth grade students scored proficient or above on the most recently reported state assessments in Language Arts (2010-11 school year). In that same year, fifty-seven percent of high school students scored proficient or above in English II. (See Appendix A, page 59, for proficiency percentages for the 2010-11 school year.)

In PEER Report #539, *Opportunities for Improving the Accountability of the Mississippi Department of Education* (September 24, 2010), PEER recommended that the Mississippi Department of Education (MDE) assess its Central Office staffing in relation to departmental workload and long-range plans for educational improvement, particularly in the area of improving instruction. In 2012, the former State Superintendent of Education requested that PEER conduct a third-party review to follow up on the recommendation to assess staffing.

Purpose and Scope

In performing this review, PEER sought to answer the following questions:

- What are MDE's strategic priorities related to improved student learning?
- To what extent has MDE aligned its Central Office staff with the strategic priorities?
- How could MDE better align its staff with its strategic priorities?

Method

During the course of this review, PEER:

- reviewed MISS. CODE ANN. Section 37-3-1 et seq. (1972) regarding the state Department of Education's responsibilities;
- reviewed information related to federal initiatives in education;
- reviewed MDE's strategic plan and goals for FY 2011-FY 2015;
- interviewed personnel of the Department of Education and personnel in ten school districts;
- analyzed MDE records and Statewide Payroll and Human Resource System (SPAHRs) data related to staffing and salaries;
- analyzed MDE records and records from the National Center for Education Statistics related to student assessment data; and,
- reviewed scholarly literature in the field of education regarding improved instruction and use of data in decisionmaking.

Due to resource limitations, PEER did not review staffing within every office at MDE. Instead, PEER selected offices based on two factors: (1) PEER selected at least two offices within each of MDE's three primary divisions; and, (2) PEER selected offices closely related to the strategic priorities identified in Report #539. PEER interviewed staff in the following offices of MDE:

- Instructional Enhancement;
- Student Assessment;
- Educational Accountability;
- Management Information Systems;
- Teacher Center;
- Licensure;
- School Improvement;
- School Recovery; and,

- Conservatorship.

(See Appendix B, page 63, for a truncated organizational chart of the Mississippi Department of Education.) PEER also interviewed a limited number of staff within the offices of Accreditation, Federal Programs, and Communications.

Background

The Mississippi Department of Education (MDE) is organized and functions under the statutory requirements of Title 37 of the MISSISSIPPI CODE ANNOTATED (1972).

Mississippi's K-12 Education Budget

According to the Joint Legislative Budget Committee's *Budget Report* for FY 2012, 62 percent of the general fund budget for that fiscal year was appropriated for educational activities (excluding the institutions of higher learning's agricultural units). K-12 public education alone accounted for approximately 45 percent of the state's total general fund appropriations for FY 2012 at over \$2 billion.

Including all funding sources, K-12 education received approximately \$3 billion in appropriations for FY 2012. The largest single appropriation was \$1.8 billion in general funds for the Mississippi Adequate Education Program (MAEP).¹ General funds represented 64 percent of the total appropriations, federal funds represented 25 percent, and state support special funds and other funds represented the remaining 11 percent. (See Exhibit 1, page 5.)

¹ The Mississippi Adequate Education Program, passed by the Legislature in 1994, was designed to provide funding levels necessary for school districts to provide an adequate education.

Exhibit 1: K-12 Education General Fund Appropriations by Funding Source for FY 2012

	General Funds	State Support Special Funds	Federal Funds	Other Funds	Total Appropriations
General Education Programs	\$87,040,000	\$25,040,942	\$788,172,818	\$30,506,725	\$930,760,485
Chickasaw Interest *	16,049,728	0	0	0	16,049,728
Mississippi Adequate Education Program	1,808,129,050	207,822,038	0	70,000,000	2,085,951,088
Schools for the Blind and Deaf	10,750,000	0	716,559	0	11,466,559
Vocational and Technical Education	73,300,000	4,300,000	16,016,870	0	93,616,870
Educational Television Authority	5,555,933	1,644,067	216,615	4,037,305	11,453,920
Library Commission	11,556,153	493,847	2,264,118	0	14,314,118
Total Appropriations	\$2,012,380,864	\$239,300,894	\$807,386,980	\$104,544,030	\$3,163,612,768

* The Legislature annually appropriates money in an effort to resolve the disparity between counties that have sixteenth section lands and the Chickasaw Cession counties that have no sixteenth section lands.

SOURCE: Mississippi Joint Legislative Budget Committee's FY 2012 *Budget Report*.

MDE's Revenues and Expenditures

MDE receives revenues from state general funds, federal grants, and other funds. For the purposes of this review, PEER focused primarily on general education programs. Therefore, the following information on revenues and expenditures does not relate to the Mississippi Adequate Education Program (MAEP), Chickasaw Interest, Schools for the Blind and Deaf, Vocational Education, Educational Television Authority, and the Library Commission.

As shown in Exhibit 2, page 6, MDE's total FY 2011 revenues from general funds were \$88,567,430. MDE's largest sources of federal grant money are those in support of child nutrition, Title I schools, and special education. MDE's primary sources of other funds are

Education Enhancement Funds, which represented approximately \$23 million in FY 2011.

Exhibit 2: MDE's Revenues and Expenditures in General Education Programs for FY 2011

Revenues

	FY 2011
General Fund Appropriation	\$ 88,567,430
State Support Special Funds	35,002,121
Federal Funds	782,500,477
Other Special Funds	17,509,351
Critical Teacher Shortage*	1,458,740
Technology Funds	841,645
TOTAL	\$925,879,764

Expenditures

	FY 2011
Personal Services	\$ 28,154,700
Travel	1,140,128
Contractual Services	30,398,599
Commodities	1,927,304
Capital Outlay	2,012,188
Subsidies, Loans, and Grants	862,246,845
TOTAL	\$925,879,764

* In 1998, the Legislature passed the Mississippi Critical Teacher Shortage Act, which provides funds toward scholarships and other incentives for educators who commit to work in geographic and subject areas deemed as having a teacher shortage.

SOURCE: MDE's Budget Request for FY 2013.

Exhibit 2 also shows MDE's expenditures for FY 2011. The majority of expenditures are categorized as subsidies, loans, and grants.

Statutory Duties of MDE

MISS. CODE ANN. Section 37-1-2 (1972) establishes the educational goals that guide the functions of the Department of Education and the Board of Education. The state's education policy is based on Section 201 of Article 8 of the MISSISSIPPI CONSTITUTION, which states:

The Legislature shall, by general law, provide for the establishment, maintenance and support of free public schools upon such conditions and limitations as the Legislature may prescribe.

Mississippi's policy for education, as provided for in state law, is sometimes difficult to interpret, as noted in PEER's 2010 report *Opportunities for Improving the Accountability of the Mississippi Department of Education* (see pages 21-22 of PEER Report #539). For example, MISS. CODE ANN. Section 37-1-2 (1972) includes the language "to improve the quality of education by strengthening and elevating its goals." Although this mandate refers to goals and quality education, it does not require any specific action by any specific entity.

Also, MDE shares responsibility with many other parties for fulfilling the education mandates in state law. These other parties include the federal government, the State Board of Education and State Superintendent of Education, other state-level boards, councils, task forces, local school boards, communities, parents, and children. The educational system is complex; the success or failure of school districts is not the result of the efforts of a single entity but could be the result of successes or inadequacies at multiple levels, including the federal, state, and local government levels. Appendix A, page 59, provides an update of the "Snapshot of the Status of Education in Mississippi" that was included in PEER's 2010 report.

Organization and Staffing

MDE has had an interim State Superintendent of Education since July 1, 2012. A truncated version of MDE's organizational chart as of September 1, 2012, is illustrated in Appendix B, page 63.

According to a salary projections report from MDE's budget office, as of September 2012, MDE had 564 total positions, 41 of which were vacant. The number of permanent, full-time positions was 453, while the number of time-limited full time positions was 111. Time-limited positions are typically funded through federal grants.

The number of general fund positions was 366 (or 65 percent of total positions), while the number of federally funded positions was 176 (or 31 percent of total positions). The majority of federally funded positions were located in offices related to special education, child nutrition, and federal programs. Remaining positions were funded by a mixture of general and federal funds or other funds (e. g., driver penalty funds).

What are MDE’s strategic priorities related to improved student learning?

According to PEER’s analysis of multiple sources, MDE’s efforts toward improved student learning should be focused on providing leadership in the areas of improved instruction and effective use of data in decisionmaking at all levels in the system.

PEER used the following sources to define MDE’s strategic priority areas related to statewide student learning:

- MDE’s education system goals and strategies for achievement;
- responsibilities of MDE staff based on statutes;
- federal influence;
- districts’ needs; and,
- scholarly literature in the field of education.

Based on this information, PEER determined that MDE has a need to provide leadership in improving instruction and for the effective use of data in decisionmaking.

Need to Provide Leadership in Improving Instruction

MDE’s goals and responsibilities, influence from the federal government, districts’ needs, and educational research suggest that improved instruction is a priority area for the education system. Specifically, the alignment of instruction to the standards and assessments is critical to improve student learning.

This section describes the importance of and need for improved instruction in Mississippi based on a variety of sources.

MDE’s Education System Goals and Strategies for Achievement

Two of MDE’s three system goals focus on increases in student learning. One of MDE’s strategies for achieving these goals includes implementation of reform in the area of instruction, along with other critical pieces associated with student learning (i. e., curriculum, assessments, and accountability systems).

According to MISS. CODE ANN. Section 37-1-3 (1972), the Board of Education is responsible for overseeing the Department of Education, as well as the statewide system of educational accountability. The board adopted the following three system goals, which are listed in MDE’s strategic plan for FY 2011-FY 2015:

- *Goal 1: to mobilize resources and supports to help ensure that all students exit Third Grade reading on grade level by 2020;*
- *Goal 2: to reduce the dropout rate to 13% by 2013; and*
- *Goal 3: to reach the national average on national assessments by 2013.*

While PEER does not agree that the goals are realistic, the goals promote increases in student learning. (Refer to PEER Report #539 for an in-depth discussion of MDE's system goals.)

MDE's strategic plan for FY 2011-FY 2015 offers the following five strategies to accomplish the three system goals:

- *Implement ongoing, comprehensive reform in the areas of instruction, curriculum, assessment design and accountability systems for all grade levels, from early education through graduation*
- *Increase the quantity and quality of teachers*
- *Increase the quantity and quality of administrators*
- *Create a culture in Mississippi that understands the value of education*
- *Redesign education for the 21st century workforce in Mississippi*

The first strategy states that MDE should be implementing reform in the area of instruction, along with other critical pieces associated with student learning, including curriculum, assessments, and accountability systems.

Also, MDE acknowledges the importance of instruction in its organizational structure, as one of three primary divisions is titled "Instructional Enhancement and Internal Operations."

Statutory Responsibilities of MDE Staff

The State Superintendent of Education is responsible for identifying educational needs to serve as a basis for short-range and long-range planning. Mississippi has a clear need for increased student learning and instruction is a critical element. Accordingly, MDE has the statutorily mandated responsibility for managing an instructional program in the state.

The State Superintendent of Education has a responsibility to identify education system needs and to plan accordingly (see next section on data use). Based on the test scores noted in Appendix A, page 59, Mississippi has a great need for increased student learning.

Instruction is a critical element to increased student learning. Accordingly, MISS. CODE ANN. Section 37-3-49 (1) (1972) gives MDE the responsibility to:

. . . provide an instructional program and establish guidelines and procedures for managing such program in the public schools. . . .

MISS. CODE ANN. Section 37-3-49 (2) (1972) also states that any curriculum objectives set by the Department of Education must be accompanied by suggested instructional practices and resources that would help teachers organize instruction to promote student learning.

Federal Influence

The U. S. Department of Education has provided waivers to several states, including Mississippi, regarding the No Child Left Behind requirement that every student be proficient in math and English by 2014. In order to receive the waiver, states were required to explain how they planned to increase the quality of instruction for all students.

The federal government is essential in identifying the national interest and goals in education and providing states with a portion of the resources needed to achieve those goals.

As of October 2012, the U. S. Department of Education had granted waivers to thirty-three states regarding the No Child Left Behind² requirement that every student be proficient in math and English by 2014. In order to receive the waiver, states must agree to a new set of conditions (e.g., measuring teacher performance, increased emphasis on low-performing schools) that are components of the newest federal education reform initiative Race to the

²In 2002, the No Child Left Behind Act of 2001 (NCLB) was signed into law as a reauthorization of the Elementary and Secondary Education Act (ESEA). The act requires that all children be at the proficient level (set by individual states) on state testing by the 2013-14 school year.

Top³. The U. S. Department of Education approved Mississippi's waiver on July 19, 2012.

The Elementary and Secondary Education Act (ESEA) waiver focused heavily on increasing the quality of instruction for all students. Three primary components of the ESEA waiver included Common Core, common assessments, and teacher evaluations, discussed below.

- *Common Core:* States receiving the waiver had to adopt college- and career-ready standards in at least reading/language arts and math. In 2010, Mississippi adopted the Common Core State Standards, which is a state-led effort coordinated by the National Governors Association Center for Best Practices (NGA Center) and the Council of Chief State School Officers (CCSSO). The standards are for English/language arts and mathematics. Mississippi's ESEA request noted that devoting resources to implementation of the Common Core standards is key to enhancing quality instruction.
- *Common Assessments:* States receiving the waiver were expected to develop and administer annual, statewide, aligned, high-quality assessments that measure student growth, preferably by joining a consortium for common assessments. Mississippi joined the Partnership for Assessment of Readiness for College and Careers (PARCC) consortium, which received a grant through the U. S. Department of Education's Race to the Top assessment competition to support the development and design of common assessments.
- *Teacher Evaluations:* States receiving the waiver were expected to develop and adopt guidelines for local teacher and principal evaluation and support systems. The evaluations are intended to be used for continual improving of instruction.

Districts' Needs

In interviews with districts' staffs, PEER found that a common need was for technical assistance in the area of curriculum and instruction.

In interviews with districts' staffs to determine their needs, one of the most common needs mentioned was technical assistance in the area of curriculum and instruction. Districts also stated that they are concerned about the implementation of Common Core and common assessments and will most likely hire consultants to provide relevant professional development to teachers.

³The most recent education reform initiative under President Obama's administration is Race to the Top. Race to the Top emphasizes high quality standards and assessments, attracting and retaining high quality teachers, implementing data systems that inform decisions and improve instruction, turning around struggling schools, and sustaining education reform.

Educational Literature

Scholarly literature in the field of education shows that instruction is key to improved student learning in standards-based reform.

Since the 1980s, education policy has been guided by standards-based reform. According to Pearson, an educational publishing and technology company, *standards-based reform* includes academic expectations for students (i. e., what students should know and be able to do) and alignment of key elements of the educational system to promote attainment of these expectations. *Alignment* may be broadly defined as the degree to which the components of an education system (i. e., standards, curriculum, assessments, and instruction) work together to achieve desired goals.

According to a 2012 article in the *American Journal of Education*, the theory of standards-based reform suggests that teachers will align their instruction with the standards and assessments and alignment will increase student learning. Thus alignment of instruction is the mediating variable between the policy of standards-based reform and the outcome of improved student learning.

The RAND Corporation notes that there is an emphasis on aligning the standards, assessments, and curriculum; however, the best system would include teacher preparation, professional development, and other supports that are aligned to promote *instruction* toward a common set of standards. Such supports should include resources that model and promote high-quality, standards-based instruction, including sample lesson plans.

Need for Effective Use of Data in Decisionmaking

MDE's goals and responsibilities, influence from the federal government, districts' needs, and educational research also suggest that effective use of data in decisionmaking at the state, district, school, and teacher levels is a priority area for the education system.

Education System Goals and Strategies for Achievement

Analysis of MDE's system goals requires effective use of data to determine where the education system is in relation to the goals and where resources might be needed. Two of MDE's strategies for achieving the system goals refer to increasing the quality of teachers and administrators; data analysis is required to determine whether MDE is on track regarding these strategies.

Referring again to the three system goals of education (see page 10), all require effective use of data for analysis. Data provides information on where the education system is in achieving its goals and whether goals should be

changed. Data related to the goals should also alert state leaders as to where problems areas are and where to shift resources. For example, low scores in reading assessments should prompt state leaders to focus more heavily on this area.

Regarding the strategies for achieving the system goals on page 10, two refer to increasing the quality of teachers and administrators. Without data, MDE cannot know whether it is on track for those strategies.

Statutory Responsibilities of MDE Staff

The State Superintendent of Education has the statutorily mandated responsibility of using and analyzing data, information, test results, evaluations, and other indicators to formulate policy and identify educational needs for both short-term and long-term planning.

According to MISS. CODE ANN. Section 37-3-12 (1972), the State Superintendent is responsible for the planning functions of the Department of Education:

*The state superintendent of public education shall be responsible for all planning functions for the department, including **collection, analysis and interpretation of all data, information, test results, evaluations and other indicators that are used to formulate policy, identify areas of concern and need and to serve as a basis for short-range and long-range planning.** Such planning shall include assembling data, conducting appropriate studies and surveys and sponsoring research and development activities designed to provide information about educational needs and the effect of alternative educational practices. [PEER emphasis in **bold** type]*

Thus the law promotes the analysis of data to inform policy, identify areas of concern, and serve as the basis for strategic planning.

Federal Influence

The current federal education reform initiative "Race to the Top" focuses heavily on using data to measure student learning, support decisionmakers in improvement areas, and improve instruction.

The federal Race to the Top initiative encourages states to build data systems that measure student growth and inform teachers and principals about how they can improve instruction.

The U. S. Department of Education, in its waiver requirements, prompted states to develop data systems to

improve student learning and support instruction, including:

- *Implementing a statewide longitudinal data system.* States should have a system that links all parts of the education system (pre-K through workforce) so that answers related to policy, practice, or effectiveness can be found and incorporated into continuous improvement practices.
- *Accessing and using state data.* States should have a plan to ensure that longitudinal data is accessible to and used to inform key stakeholders (e. g., parents, students, teachers) and that the data supports decisionmakers in continuous improvement of policy, instruction, operations, resource allocation, and overall effectiveness.
- *Using data to improve instruction.* States should have a plan to provide local education staff with the resources they need to inform and improve their instructional practices, decisionmaking, and overall effectiveness.

Districts' Needs

In interviews with districts' staffs, PEER found a common need for clear and timely analysis of accountability data, as well as sharing more information on "what works" in education.

In interviews with districts' staffs, a common need among staff was for clear and timely analysis of accountability data so that adjustments could be made with teachers and students before the next school year begins.

Also, some districts mentioned that they need more information about "what works" in education and sharing improvement strategies among districts. They stated that because MDE has the potential for discovering trends in student learning (e. g., trends in certain subjects, geographic locations, or education initiatives), MDE is in the best position to have this information and share it with districts, schools, and teachers.

Educational Literature

Scholarly literature in the field of professional education shows that data analysis significantly improves the quality of decisionmaking, which can ultimately increase student learning.

As noted by Harvard University's Center for Education Policy Research, policy and management decisions directly influence schools' and teachers' abilities to improve student achievement. Valid and reliable data analysis significantly improves the quality of decisionmaking. With the right data and analysis, better decisions can be made to increase student learning. Also, research shows that

using data in making instructional decisions can lead to improved student performance.

To what extent has MDE aligned its Central Office staff with the strategic priorities?

Within the past year, MDE has increased the alignment of its staff with the strategic priority areas of improved instruction and effective use of data statewide. However, MDE is in a transition phase and has not yet achieved the level of alignment needed to be best positioned for the future of education. In the offices PEER reviewed, resources are generally assigned to process-related tasks that do not have a clear link to the strategic priorities. Because MDE has not yet allocated a sufficient number of staff to work toward achievement of its strategic priorities, the department has relied on contractors to perform key responsibilities related to those priorities but has not specified in these contracts the necessary performance requirements. In some cases, MDE staff plan to assume the responsibilities of contracted staff in the future.

In the previous chapter, PEER identified two priority areas for MDE staff based on several sources: improved instruction and effective use of data. These priority areas correlate with the future direction of education in improving student learning. This chapter describes how well MDE's Central Office staff are aligned with these priorities.

PEER found that improvements in aligning staff with strategic priorities have been made, particularly within the past year, which indicates that MDE is on the right track regarding the strategic priority areas.

However, MDE is in a transition phase and has not yet achieved the level of alignment needed. PEER found that:

- a limited number of MDE Central Office staff are assigned to improved statewide instruction;
- a limited number of MDE Central Office staff are assigned to effective statewide use of data;
- MDE focuses on process as opposed to educational improvement; and,
- MDE uses contractors extensively to perform critical functions.

Improvements in MDE Central Office Staffing Related to Improved Statewide Instruction

Within the past year, MDE has added two content specialists in English/language arts and mathematics to its staff to fill critical skill gaps. In December 2012, another content specialist position will go before the State Personnel Board for approval.

In 2010, MDE lacked content specialists in math and English/language arts. Within the past year, MDE filled positions in these two areas. These content specialists are available to provide much-needed expertise in their respective areas and are assigned to critical educational initiatives (e. g., Common Core). MDE is also expecting to fill a position related to literacy/dyslexia; this position will be presented to the State Personnel Board for approval in December 2012.

By hiring staff in these areas, MDE has filled critical skill gaps. However, an overall look at staff suggests that the addition of these staff members is not sufficient to meet the demands of the education system in improving instruction statewide.

Limited Number of MDE Central Office Staff Assigned to Improved Statewide Instruction

While staffing improvements have been made in the area of instruction, PEER determined that only one percent of positions at MDE is specifically tasked with improving classroom instruction in all of the state's school districts. Because MDE has allocated the majority of its resources to other areas, MDE has limited its own impact in the priority area of improved instruction, particularly the deep level of implementation necessary for increased student learning to occur.

In PEER's 2010 report *Opportunities for Improving the Accountability of the Department of Education*, PEER found that the number of MDE staff devoted to assisting teachers and districts in improving regular academic instruction statewide is low compared to the number of staff devoted to specific groups of students (e. g., students enrolled in vocational courses) or to functions with low academic orientation (e. g., administrative support).

Distribution of MDE Staff Among Divisions

Forty-nine percent of MDE's staff is devoted to one of three primary divisions (the Division of Instructional Enhancement and Internal Operations).

To follow up on PEER Report #539 regarding staffing allocation, PEER staff reviewed MDE's current organizational chart. Approximately 49 percent of MDE's staff works in the Instructional Enhancement and Internal Operations Division. Instructional Enhancement and Internal Operations includes the following offices:

- Career and Technical Education and Workforce Development;
- Special Education;
- Instructional Enhancement;
- Curriculum and Instruction;
- Business Services;
- Federal Programs;
- Student Assessment; and,
- Healthy Schools and Child Nutrition.

The Quality Professionals and Special Schools Division includes the following offices:

- Mississippi School for the Deaf;
- Mississippi School for the Blind;
- Mississippi School for the Arts;
- Educator Licensure;
- Troops to Teachers; and,
- Teacher Center.

The School Improvement, Oversight, and Recovery Division includes the following offices:

- Dropout Prevention/Compulsory School Attendance;
- School Improvement;
- School Recovery;
- Safe and Orderly Schools;
- Junior Reserve Officer Training Corps; and,
- Conservatorship.

The Educational Accountability Division includes the following offices:

- Internal Accountability and Program Evaluation;
- Reporting;

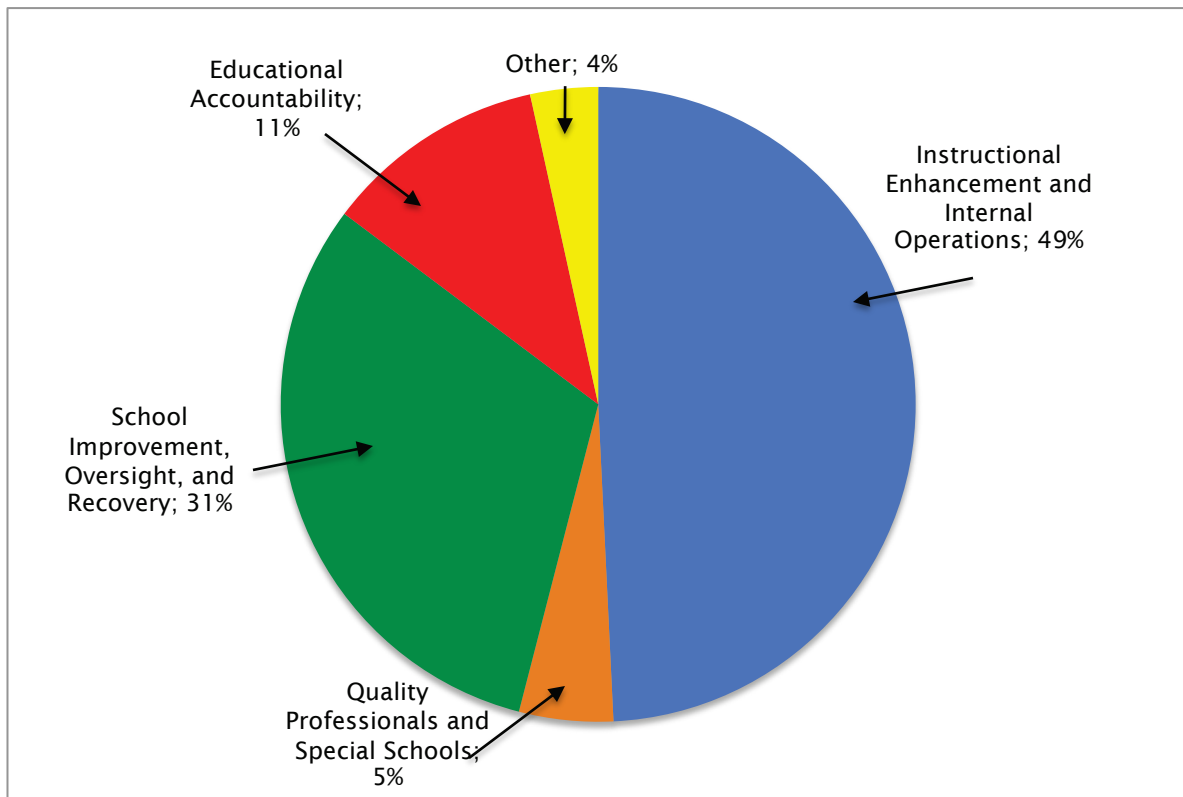
- Management Information Systems; and,
- Accreditation.

Other offices include:

- Human Resources;
- Budget;
- School Financial Services; and,
- Special Assistant to the Superintendent.

Exhibit 3, below, shows the percentage of staff positions allocated to MDE Divisions.

Exhibit 3: Percentage of Positions Allocated to Key MDE Divisions*



*Excludes staff for the Schools for the Blind and Deaf

SOURCE: PEER analysis of MDE's organizational chart dated September 1, 2012, and Salary Projections report by program.

Offices Devoted to Curriculum and Instruction

Within the Instructional Enhancement and Internal Operations Division, six percent of MDE staff is employed in an office devoted to improving curriculum and instruction statewide. However, less than half of these employees are actually engaged in activities that improve instruction statewide.

Further review of the Instructional Enhancement and Internal Operations staff showed that only six percent of those staff members (sixteen positions) work in an office devoted to improving curriculum and instruction statewide, while forty-two percent (107 positions) work in offices serving either special education students or career technical education. (See Exhibit 4, page 22.) Another fifteen percent work in financial or administrative offices (including accounting and procurement and contracts), thirteen percent are devoted to the Office of Federal Programs, nineteen percent are devoted to child nutrition, and five percent are devoted to student assessment.

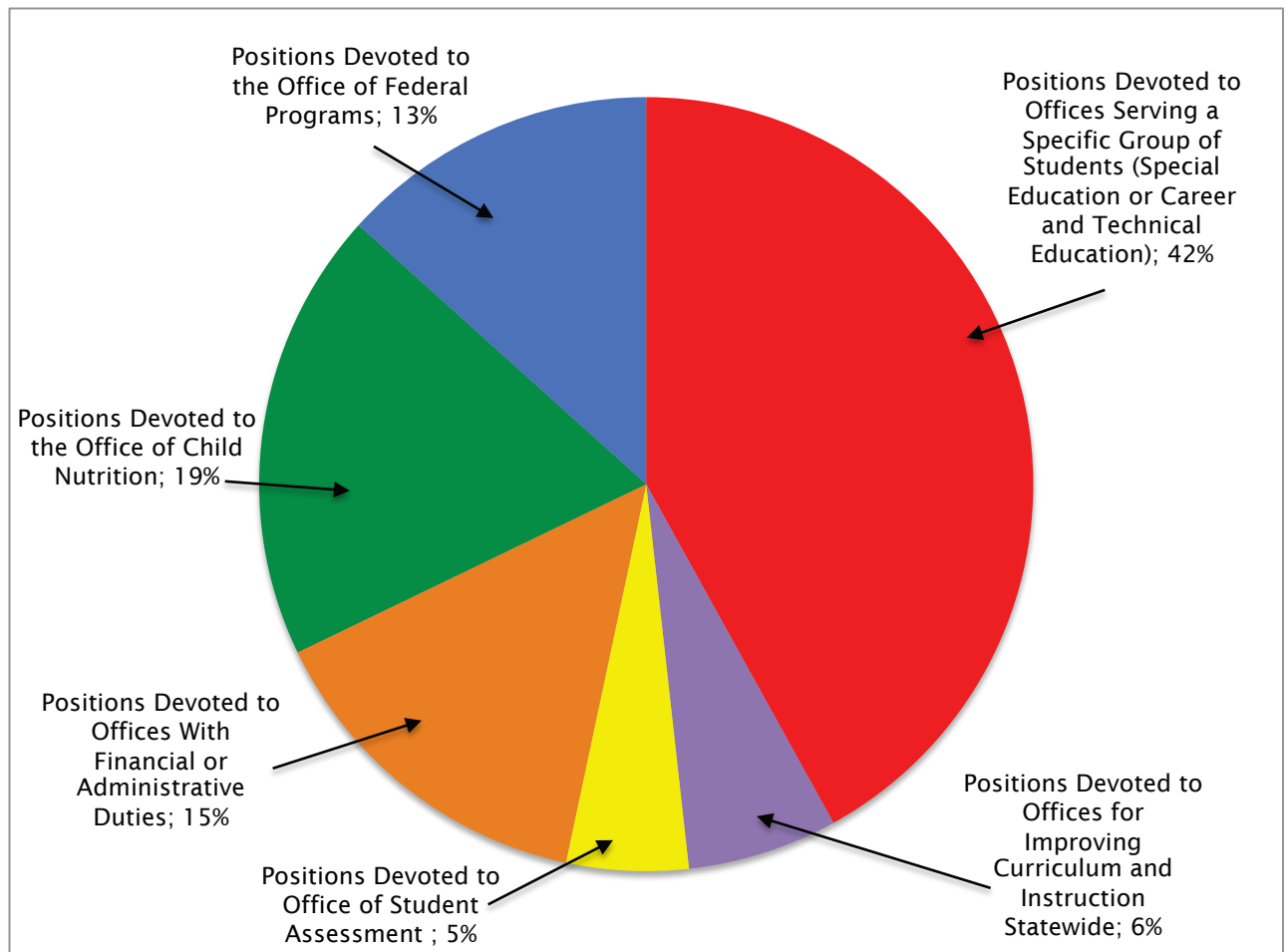
PEER interviews and reviews of the Job Content Questionnaires for the positions devoted to improving curriculum and instruction statewide showed that less than half of the staff is actually engaged in activities that improve instruction statewide (as discussed in the following section), while the majority of staff are devoted to support, textbooks, and managerial duties.

After analyzing MDE's staffing and interviewing employees within the offices of Instructional Enhancement, Curriculum and Instruction, and Student Assessment, PEER determined that only one percent of positions (seven employees) at MDE work directly with improving curriculum and instruction statewide. (See Exhibit 5, page 23.) Those who are devoted to improving curriculum and instruction statewide include five content specialists representing the following subject areas:

- English/language arts;
- math;
- social studies;
- foreign language; and,
- the arts.

In addition, the Bureau Director and Associate Superintendent for Instructional Enhancement have regular, direct contact with teachers and administrators across the state. These two staff members serve on committees that focus on instructional improvement and participate in statewide training efforts.

Exhibit 4: Percentage of Positions Allocated to Smaller Offices Within the MDE Division of Instructional Enhancement and Internal Operations



SOURCE: PEER analysis of MDE's organizational chart dated September 1, 2012, and Salary Projections report by program.

Limited Number of Staff Work Directly to Improve Curriculum and Instruction Statewide

PEER determined that only one percent of MDE positions (seven employees) is devoted to improving curriculum and instruction statewide. Other MDE staff offer support to curriculum and instruction, but they do not have the pedagogical background needed to meet fully the instructional needs of districts.

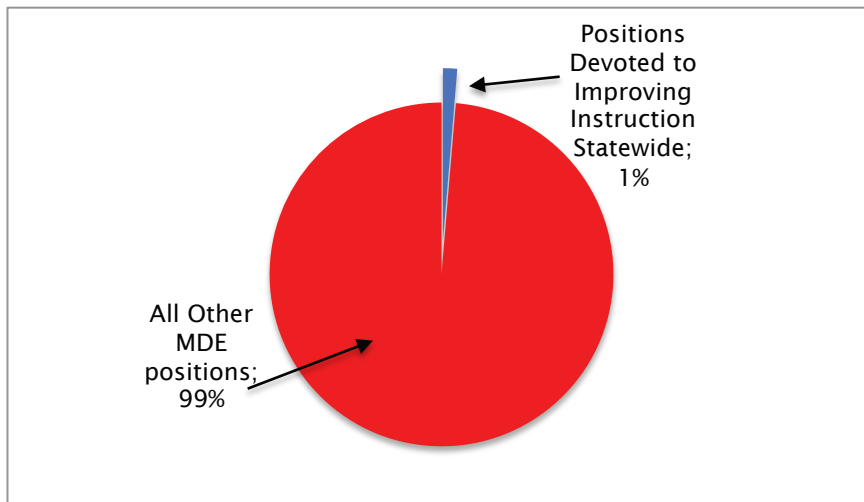
In 2010, MDE had even fewer staff devoted to improving instruction statewide. At that time, MDE lacked content specialists in math and English/language arts. Within the past year, MDE has recognized the need for more

resources in this area and has hired two content specialists. However, there is no reading specialist, even though one of MDE's three main system goals, according to its strategic plan, is to "mobilize resources and supports to help ensure that all students exit Third Grade reading on grade level by 2020." (See page 10.) Only one percent of MDE positions (five employees) is devoted to improving curriculum and instruction statewide, as shown in Exhibit 5, below.

MDE notes that eighteen staff members in the Office of Federal Programs provide support to districts in various areas, including curriculum and instruction. While these staff members may lend support to curriculum and instruction, they do not have the pedagogical background that content specialists provide; therefore, they are limited in the quality of assistance they can provide.

Also, MDE notes that an additional two Educators in Residence work directly with teachers statewide; however, they are not included in MDE's organizational chart. These staff members do not have permanent duties and are therefore excluded from Exhibit 5, below.

Exhibit 5: Percentage of Positions at MDE Devoted to Improving Curriculum and Instruction Statewide*



* This chart does not include staff for the Schools for the Blind and Deaf because those staffs are dedicated to specific schools rather than being Central Office staff.

SOURCE: PEER analysis of MDE's organizational chart dated September 1, 2012, Salary Projections report by program, Job Content Questionnaires, and interviews with MDE staff.

Activities Performed by Staff Devoted to Curriculum and Instruction

Although limited in number, MDE staff devoted to improving curriculum and instruction statewide have implemented efforts worth noting in this report. For example, these staff have begun to provide monthly webinars accessible to teachers on topics such as an overview of the Common Core standards.

The Office of Curriculum and Instruction has recently introduced innovative ways of improving direct communication with teachers. An open listserv was launched in September 2012 that provides information, including weekly updates, on the Common Core standards and upcoming webinars.

Also, the Office of Curriculum and Instruction has begun providing monthly webinars for educators that are recorded/archived for educators to access at any time. MDE states that topics are driven by educator feedback. Webinars have included topics such as an overview of the Common Core standards and sample lesson plans. These initiatives demonstrate a conscious effort by MDE to provide more direct services to educators across the state.

Resources Not Allocated to Address Fully the Districts' Needs in the Area of Curriculum and Instruction

MDE content specialists provide services to districts' and schools' staffs in curriculum and instruction support. However, because MDE has not allocated more resources to curriculum and instruction, MDE has not provided the technical assistance that districts need (e. g., in-depth professional development regarding Common Core).

As noted in the previous section, five content specialists are responsible for delivering quality services to 152 school districts, over 30,000 teachers, and over 490,000 students in the state. These limited resources inhibit MDE's ability to impact the priority area of improved instruction for all students.

Content specialists described their primary responsibilities as providing professional development in the content areas and/or on Common Core, answering questions from districts, developing resources to be used by teachers, and revising curriculum, among other activities. Currently, content specialists in English/language arts and math are heavily involved in activities related to Common Core and common assessments, including professional development related to Common Core and reviewing common assessment items.

Content specialists also have other duties. For example, the specialist for social studies is also responsible for gifted programs, while the specialist for foreign language is responsible for the statewide Response to Intervention

initiative.⁴ Because of their responsibilities in other areas, content specialists cannot devote their time fully to improving instruction in their specialty content areas.

MDE is recruiting for a specialist in dyslexia; however, there are no specialists at the MDE Central Office for science or reading. The lack of a specialist in reading is troubling because one of MDE's main goals, according to its strategic plan, is to "mobilize resources and supports to help ensure that all students exit Third Grade reading on grade level by 2020."

While MDE content specialists provide professional development in curriculum and instruction, district staff stated in interviews with PEER that MDE provides a limited number of training opportunities and they are not sufficient to support deep implementation of new initiatives. For example, professional development regarding Common Core has been general in nature. MDE states that follow-up training will be more in-depth; however, some districts have already begun to implement Common Core and have hired outside contractors to provide Common Core training. Because MDE has not identified high-quality professional development providers for districts and schools, districts might contract with someone who provides incorrect or inadequate professional development for teachers.

Also, because MDE relies on a "train-the-trainer" strategy, the staff who are sent to professional development (e. g, curriculum coordinators, teachers) might or might not be competent to provide training to others within the district. MDE does not ensure that those who attend professional development as "trainers" are actually trained upon returning to the district.

MDE content specialists stated that districts and schools consistently ask for more technical assistance related to curriculum and instruction, but because MDE has not allocated more staff to this area, MDE does not have the capacity for this kind of direct support.

⁴ Response to Intervention (RtI) is a three-tier instructional model adopted by the State Board of Education in 2005. It has three tiers of instruction: (1) Quality classroom instruction based on Mississippi Curriculum Frameworks; (2) focused supplemental instruction; and (3) intensive interventions specifically designed to meet the individual needs of students.

Need for Reform Efforts in Alignment

Mississippi has a need to focus on deep implementation of education reform efforts geared toward the alignment of curriculum, assessment, and instruction to improve student learning (e. g., provide high-quality model lessons for use by districts, schools, and teachers to align instruction to the Common Core).

Because Mississippi has a need for improved student learning (based on student test scores; see Appendix A, page 59), MDE should focus its resources on efforts that are most correlated with student learning. The alignment of curriculum, instruction, and assessments is critical to achieving the education system's goals to increase student learning. Alignment means that all three functions are directed toward the same goal and reinforce each other. Assessments should measure what students are actually taught, while what is actually taught should reflect the curriculum that teachers want students to master.

MDE has more control over the standards and statewide assessment system and making sure that standards and assessments are aligned with each other. Because instruction is implemented at the classroom level by thousands of teachers, MDE has the difficult task of ensuring alignment of instruction with the standards and assessments. Research has shown that the shortcoming of previous state standards-based reform efforts was the lack of attention to implementation. Therefore, in order to have the biggest impact on the education system regarding student learning, MDE must provide leadership and resources for implementing reform strategies in the area of instruction.

The National Center on Educational Outcomes says that state education agencies should do the following:

- make their primary role be about helping all school districts in their state improve the quality of instruction provided to all students;
- take steps to reduce fragmentation across state education agency (SEA) offices and departments by requiring shared, cross-agency work intentionally designed to increase the capacity of all districts to improve instructional practice and student learning;
- establish a statewide system of support intentionally designed to provide consistent, high-quality technical assistance to all districts in the state to improve instructional practice and student learning;
- evaluate the degree to which SEA actions affect district performance;

- recognize districts for system-wide improvement efforts that have a positive affect on all students and student groups; and,
- provide tools, products, and/or services that support districts in fully implementing identified instructional strategies.

According to a 2012 report, *Closing the Expectations Gap*, by Achieve (a nonprofit organization founded by governors and business leaders that played a key role in helping to develop the Common Core standards), states can support districts, schools, and ultimately educators with standards implementation in several different ways, including:

- guiding/supporting district and school use by providing high-quality processes, protocols, and exemplars (i. e., models or good examples), including rubrics or tools that the state provides, which are often used by district leaders, principals, and curriculum directors (e. g., alignment tools);
- approving/certifying a list of curricular and supplemental materials aligned to the new Common Core standards;
- developing curricular and supplemental materials for voluntary use by districts and schools to align the state’s required courses to the Common Core standards. These materials could include those the state provides or makes available for direct use in classrooms, often by teachers (e. g., model units, lessons, curricular maps, graphic organizers); and,
- requiring district and school use of curricular materials aligned to the state’s required courses and the Common Core standards.

Four states—Delaware, Kentucky, Oklahoma, and Nebraska—are requiring that districts use materials aligned to the common standards in English/language arts and mathematics.

Improvements in MDE Central Office Staffing Related to Use of Data

Within the past year, MDE has focused staffing efforts on improved data quality and easier access to data. Such efforts are critical, as they provide the foundation for effective use of data for decisionmaking in the future.

On pages 13 through 16, PEER concluded that effective use of data in decisionmaking at the state, district, school, and teacher levels is a priority for the education system. MDE has made progress in the area of improved data quality and is working toward improving access to data.

Improvements to Data Quality

MDE's efforts to improve data quality and accountability include giving staff responsibilities for implementing proper documentation and data coding practices, contracting for development of a complete business intelligence system, and developing an appeals process for districts that question accountability data.

Since 2011, MDE's Office of Management Information Systems (MIS) has focused on improving accountability for data quality and documentation of data and coding practices. As key employees left the office, they left with valuable knowledge needed to continue the work related to data. The Office of MIS was placed under the Office of Educational Accountability and staff began the task of recreating and documenting much of the coding necessary for producing critical reports (e. g., reports regarding the accountability results) and for ensuring data quality/opportunities for replication. The office hired two directors with the necessary background in infrastructure and information technology governance.

MDE has also contracted the responsibility for developing a complete business intelligence system (i. e., data warehouse). The system will include a data dictionary with metadata to describe the fields in the system so that if key staff members leave, other staff will have the information they need to perform those duties. MDE will manage the system once completed.

Also, to improve accountability, the staff and responsibilities of a former office (the Office of Research and Statistics) were spread among other offices to improve accountability, including the Office of Accreditation's Accountability Services and Systems, the Office of MIS, and the Office of Reporting.

The Office of Accreditation's Accountability Services and Systems has implemented an appeals process for districts to utilize should they question any of the data to be used in the state and/or federal accountability model. In August 2012, an Internal Review Committee met to review such appeals from thirty-two districts, which covered 160 individual issues. The committee voted to grant requests on forty issues. Also, based on inaccuracies or misunderstandings reflected in the districts' requests, the committee requested that three of the thirty-two districts submit Data Improvement Plans.

Efforts to Improve Access to Data

MDE's efforts to improve access to data include creating an Office of Reporting responsible for streamlining federal and state reporting, along with other information requests. Also, when the Office of MIS assumes responsibility for the business intelligence system in development, the system should provide easier access to data for reporting and analytical purposes.

In an effort to provide data more efficiently, MDE created the Office of Reporting. This office has responsibilities related to federal and state reporting, memoranda of understanding, requests related to the Family Educational Rights and Privacy Act, and public records requests. By having the reporting function located in one office, MDE has streamlined the reporting process.

Also, when the Office of MIS takes over responsibilities for the business intelligence system being developed, stakeholders should have easier access to data. For example, MDE staff should have easier access to program-level data for analytical purposes. Eventually, data should be available to district-level and school-level staff.

Improvements to data quality and access to data are critical to future efforts in data use. As reliance on data continues to grow, MDE will be expected to move from establishing data quality and ease of access to data to answering questions related to what the data means and how can it be used for educational improvement.

Focus on Improving Accountability Data

In May 2012, the State Board of Education established an Accountability Task Force to review and make recommendations to simplify and improve the accountability model. This effort should provide for more clear and timely analysis of accountability data for districts.

In PEER interviews with districts' staffs, several districts mentioned the need for more timely accountability data. In recognition of the complexity of the accountability model, the State Board of Education established an Accountability Task Force to review the accountability model and make recommendations to improve and simplify the model. By simplifying the model, less work will need to be done to prepare the accountability information for districts and districts can have a clearer understanding of the information provided. Thus districts should have the information they need earlier in order to prepare more effectively for the next school year. For example, professional development in the summer could be geared toward specific areas of weakness according to the accountability data provided.

Limited Number of MDE Central Office Staff Assigned to Statewide Effective Use of Data

MDE staff have primarily been focused on improving data quality for reporting or accountability purposes but have not achieved the level of staffing needed to address what the data means and how it all fits together to answer “big picture” questions. MDE lacks staff with the skill sets needed for analyzing data in order to make improvements in student learning statewide and to provide tools needed to support data-driven decisions by schools and districts. MDE has launched two promising initiatives for supporting school improvement through effective use of data (longitudinal databases and the eScholar business intelligence system) that will require MDE to ensure that it has the in-house expertise to utilize these systems and adequately monitor associated contracts.

PEER determined that the offices primarily responsible for handling data related to statewide student learning are:

- the Office of Management Information Systems;
- the Office of Reporting;
- the Office of Accreditation;
- the Office of Student Assessment; and
- ultimately, the individual program offices.

PEER interviewed MDE employees within several offices to determine the extent to which they analyze data or provide adequate resources for other stakeholders (e. g., MDE staff, district staff) to analyze data.

Staff Assigned to Analysis of Data and Providing Tools to Support Data-Driven Decisions by Schools and Districts

MDE lacks staff with skills in data measurement who are able to perform complex statistical analyses that would help program offices and district staff move toward educational improvement. Also, MDE lacks staff assigned to providing tools to support data-driven decisions by schools and districts.

PEER interviewed staff within several MDE offices and found the following deficiencies related to MDE’s use of data to improve student performance:

- MDE lacks staff with skills in data measurement who are able to perform complex statistical analyses. Several MDE staff members agree that having staff with skills in understanding and manipulating data is critical to making data central to decisionmaking. While program staff may have the skills to handle simple data analyses, they do not have the skills to perform more complex statistical analyses. For example, staff in the Office of Curriculum and

Instruction might be able to understand and conduct statistical analysis on trends in test scores in a particular subject over time; however, they would not have the skills to perform statistical analyses on which programs or instructional strategies are achieving the greatest increases in test scores in a particular subject area. Another example of needed analysis would be to use data to determine which combination of indicators (e. g., test scores combined with teacher evaluation information) are the best predictors of success. Such would involve more complex data analyses (e. g., regression analyses). The goal should be for MDE staff to provide data that has already been analyzed to program staff so that decisions may be made in that program area. This also applies to data for districts' staffs. Accountability data that is already analyzed by MDE staff would allow them more time to focus on ways to improve based on the data provided.

- MDE staff provide little training to districts on how to manipulate data, what data means, or how it may be used to make decisions. Districts' staffs receive a large amount of information, usually in large spreadsheets, and they must know how to translate the information so that data-based decisions can be made.
- Instead of offering a unified system for storing and analyzing data from various sources, districts maintain their own MIS packages. These separate systems can affect data quality, as well as decreased efficiency in collecting, analyzing, and reporting data.
- Staff in MIS are devoted to primarily internal information technology functions. MIS staff assigned to the accountability model⁵ are simply in charge of running the model according to the specifications and determining performance classification.⁶ Currently, outside contractors are responsible for most of the duties related to measurement. (See "Use of Contractors to Perform Critical Departmental Functions," page 40.)
- MDE lacks efficiency in its operations due to the absence of a documented business intelligence system for MDE staff, and eventually district and school staff, that allows end users (whether MDE employees, or districts, or other users) to access routine reports and information. For example, MDE staff submit requests

⁵ According to MDE staff, the Mississippi Statewide Accountability Model provides an annual assessment of instructional effectiveness for each school district in the state. The system uses results from statewide assessments and high school completion data to determine the level of instructional effectiveness.

⁶ Beginning with the most recent state assessments in 2012, schools and districts receive performance classification letter grades of A, B, C, D, and F. The new performance classification labels replaced the formerly used labels of Star, High Performing, Successful, Academic Watch, Low Performing, At-Risk of Failing, and Failing.

to MIS to run basic enrollment reports instead of employees having the capability to run the reports themselves. Thus, the skills of MIS employees are not being used to the fullest extent because they are performing routine tasks. Such a system is currently under development and will include a data dictionary/lexicon with metadata to describe the fields so that there is a common understanding of the data among users.

- MDE does not conduct educational research using a linked longitudinal data system. In 2010, MDE had an office for research and statistics; however, that office primarily focused on running the accountability model, which provides labels for districts and schools, as noted previously. Those responsibilities have since been reassigned among various MDE offices. The longitudinal data system is currently being developed by a contractor. (See page 37.)

Staff Responsible for Using Assessment Results

State assessments have not led to major reforms in the area of reading (although test scores are low in this area), do not provide high-quality resources for short-term assessments that teachers can use throughout the school year, and indicate a need for more focus on data analysis and research on what assessment data means, particularly in relation to other education data sets (e. g., longitudinal data).

The value placed on statewide assessments is clear. No Child Left Behind requires every state to test third grade through eighth grade students annually in the areas of reading/language arts and math. States are also required to test in these subject areas once in grades ten through twelve. Under the Race to the Top initiative, states must use student test results as a “significant factor” in evaluating teachers.

For FY 2013, MDE has projected that it will spend approximately \$11.7 million on its statewide assessment program. (See Exhibit 6, page 33.)

Exhibit 6: FY 2013 Projected Expenses Related to Statewide Assessments

Expense Category	Expense Amount	Percentage of Total Expenses
In-house staff salaries	\$ 641,664.82	5%
Contractual staff	257,348.00	2%
Testing contractors	10,729,315.00	92%
Testing Advisory Committee	74,000.00	1%
TOTAL	\$11,702,327.82	100%

SOURCE: FY 2013 Salary Projections report and contracts provided by the Office of Student Assessment.

Staff of the Office of Student Assessments primarily work as liaisons between contractors performing tasks associated with the development of the assessments. Staff are not content specialists; they do not review assessments items or analyze assessment data. They primarily respond to process-related questions from districts. Thus, the primary responsibility for analyzing data lies with program personnel and personnel in the Office of MIS.

How Assessment Data is Used

Although the state invests a significant amount of money in its assessment program, the program alone does not inform instruction at the state, district, or school level. According to MISS. CODE ANN. Section 37-16-1 (a) (1972), one primary reason for a statewide assessment system is to assist in the identification of educational needs at the state, district, and school levels.

Results of State Assessments Have Not Led to Major Reform in the Area of Reading

State assessments show a need for increased focus in reading; however, MDE has not increased its focus on reading by employing specialists to guide early childhood and literacy initiatives.

As noted previously, Mississippi has consistently ranked in the bottom in national indices of student learning. Also, Mississippi students are not demonstrating proficiency on state assessments. Mississippi's most recent state assessments in the spring of 2012 showed that only fifty-

three percent of third graders are considered to be at least proficient in English/language arts. Only fifty-four percent of eighth graders are considered at least proficient in English/language arts. These results indicate a clear need for MDE to shift resources to the area of language arts, particularly in the area of reading. However, MDE does not have a reading content specialist on staff. The content specialist for English/language arts is currently responsible for developing a state literacy plan, but he is currently assigned to tasks related to Common Core and common assessments.

Staff devoted specifically to reading could perform duties such as:

- identifying and disseminating information to districts on best practices for reading instruction and interventions for students who are falling behind;
- providing professional development to district and school staff in reading instruction and interventions;
- identifying teachers who demonstrate effective reading instruction and use them to train other teachers;
- conducting research to determine the effectiveness of reading programs in the state; and,
- promoting a statewide literacy plan to provide for a shared understanding of how to improve reading scores.

Even though one of MDE's education system goals is for students to exit third grade reading on grade level and the strategic plan for FY 2011-FY 2015 indicated that MDE would fill positions to guide early childhood and literacy initiatives, MDE does not have a specialist in reading or early childhood education on staff. In November 2012, MDE informed PEER that the department will make a recommendation to the board to hire a content specialist in the area of dyslexia/literacy.

Instead of using assessment data to shift resources within the department, MDE uses the assessment program for accountability purposes. For example, low scores might trigger school improvement efforts from another office at MDE.

Results of State Assessments Not Used at District or School Levels to Inform Instruction for Current Students

Educators should be able to revise instruction for current students based on feedback from a solid assessment program. However, the current statewide assessment program focuses heavily on statewide, end-of-course tests and does not provide high-quality resources for short-term assessments that teachers regularly utilize throughout the school year to adjust instruction.

An effective assessment system should provide information for accountability as well as inform instruction. Two types of assessments are given to students: *summative* assessments (i. e., “end-of-course” tests) and *formative* assessments (i. e., short-term tests given throughout the school year). Summative data, collected at the end of the year, is useful in assigning standardized judgments on proficiency on certain content standards. Summative data does not provide timely feedback for informing instruction for current students because scores are not provided immediately. Formative data, collected from short-term tests throughout the school year, have been proven to be more effective in guiding instruction in ways that have positive impacts on student learning, particularly for low-performing students.

Mississippi’s statewide assessment program is geared toward summative assessments, as they provide district accountability information; the statewide system does not provide high-quality resources for formative assessments that teachers regularly utilize. However, formative assessments have a greater impact on student learning because these assessments provide more timely information than summative assessments. Formative assessments provide immediate and specific feedback so that educators can revise instruction (e. g., re-teach a specific content standard).

Other states (e. g., New York, Vermont) have supported initiatives to ensure teacher participation and support of formative assessments and to sustain teachers’ efforts to learn and deepen skills in formative assessment.

Need for Focus on Data Analysis and Research

MDE should focus on supplying formative data tools to provide a “snapshot” for educators, longitudinal data for better understanding of what the data means over time, a research agenda to answer critical questions, and professional development on data use for state, district, and school staff.

Need for Formative Data

Developing high-quality assessments is important; however, knowing how to analyze and apply this information is equally important to improve student learning. Educators typically use formative assessments on a regular basis to tailor instructional decisions for individual students.

The Partnership for Assessment of Readiness for College and Careers (PARCC)⁷ plans to develop formative assessments in reading, writing, and math that could be used by teachers any time throughout the school year to assess whether students are on track to mastering the standards at their grade levels. These assessments could be used to inform instruction throughout the school year.

Need for a Longitudinal Data System and a Research Agenda

MDE needs longitudinal data to answer research questions such as:

- What performance level in middle school indicates that a student is on track to succeed in high school?
- Which teacher prep programs have best prepared teachers to improve student learning?

Such questions are at the core of educational effectiveness. Stakeholders need information from research to improve student performance and system performance. Access to this information would give teachers the information they need to tailor instruction to individual students, would give administrators the information they need to manage schools efficiently and effectively, and would enable policymakers to determine which initiatives show the best evidence of improving student performance.

⁷ The Partnership for Assessment of Readiness for College and Careers is a consortium of twenty-three states, plus the U. S. Virgin Islands, working together to develop a common set of K-12 assessments in English and math anchored in what it takes to be ready for college and careers.

Need for Professional Development of MDE Staff and Districts' Administrators and Teachers

In the area of effective use of data in decisionmaking, MDE has the responsibility not only to use data in its own decisions but also teach districts how to use data and provide the tools districts need to facilitate data use.

Teachers and administrators would likely require extensive professional development to build their expertise in identifying and analyzing relevant data and adjusting instructional practices and school processes in response to such data.

Improvement Initiatives in Development

MDE has contractors assigned to two promising Initiatives for supporting school improvement through effective use of data: longitudinal databases and the eScholar business intelligence system. MDE should ensure that it has in-house expertise to utilize the systems and adequately monitor associated contracts.

MDE has two initiatives intended to help improve the state education system's use of data for decisionmaking and increase efficiency: longitudinal data systems and the eScholar business intelligence system. MDE has given responsibility for these initiatives to outside contractors, but must ensure that it has the in-house expertise to use the systems, adequately monitor or audit any contracts related to these systems, and provide training on them.

Regarding effective use of data, the National Center on Educational Outcomes says that state education agencies should do the following:

- use data to identify and respond to common needs related to student learning across areas of the state;
- establish clear expectations for effective data use across state education agency offices and departments, facilitating coherence and reducing fragmentation in the services and/or supports provided to districts;
- refine, redefine, or create new state systems of support focused on building the capacity of all districts in the state to improve instructional practice and student learning;
- establish mechanisms for providing high-quality and consistent support—including facilitation and professional development--to all districts in the state in the effective use of data to improve the learning of all students and groups of students, such as students with disabilities;
- provide tools/products/services that facilitate the effective use of data by all districts, schools, and

teachers in improving instructional practice and student learning; and,

- ensure that state initiatives are targeted to providing support to underperforming districts and, at the same time, are applicable to and used by all districts in the state to support higher levels of learning for all students.

MDE Often Focuses on Process as Opposed to Educational Improvement

In the offices PEER reviewed, staff spend more time focusing on questions from districts and other stakeholders related to processes rather than focusing on how to improve education statewide. This is likely due to the frequency of changes in educational standards and programs. However, this condition also points to a need for MDE to find more efficient ways to communicate process information to districts, schools, and teachers so that Central Office staff can focus on strategic priorities to improve the education system.

In interviews with MDE staff, PEER staff found a heavy focus on providing information via telephone and e-mail on basic process information. For example:

- *Office of Licensure*--The Office of Licensure assists educators and prospective educators in obtaining and maintaining licensure. The office handles a large volume of phone calls from prospective teachers regarding the status of their licenses. The Office of Licensure mails letters to licensure applicants if there is a problem with the documentation submitted, which adds time to the application process. Also, MDE mails licenses to teachers and administrators, but could increase efficiency by sending licenses electronically. Answering phone calls distracts staff from the responsibility of processing licenses and reduces time available to focus on how data related to licensing should be used to make better policy or process decisions.
- *Office of Student Assessment*--At least five of the thirteen staff members in the Office of Student Assessment are responsible for answering questions related to assessments and providing training on assessment requirements. Training sessions on assessments provided to districts cover process-related issues, such as complying with laws on testing special education students. While the communication of assessment requirements is important, it should represent a limited portion of the staff's time, much of which should be focused on how and whether the assessment program accurately measures student learning. With the state's transition to common assessments, the office should be focusing its efforts on such issues as how data from common assessments

could be used to improve instructional practice and student learning.

- *Office of MIS*--Staff in the Office of MIS focus on processes when communicating with districts. For example, MIS staff answer questions on data entry or timelines for entering data. MIS staff do not teach districts' staffs what the data means or how it may be used.

Internally, staff in the Office of MIS are consumed with basic requests, such as running enrollment reports or pulling data from multiple sources into one spreadsheet or chart for reporting purposes. The focus on routine tasks takes away the office's opportunity to help MDE staff and districts' staffs focus on what the data means.

Because MDE's staff spends more time focused on processes, they have fewer resources to devote to MDE's strategic priorities, which should include improving instruction and using data effectively. This is likely due to frequent changes in educational standards and programs, as mentioned in the 2010 PEER report *Opportunities for Improving the Accountability of the Mississippi Department of Education* (see pages 71-81 of that report).

These conditions create an environment in which districts' staffs frequently communicate with MDE so that they can communicate the changes to their schools. MDE staff expressed that some districts do not pass on information to schools and teachers as they are required, which potentially compounds the problem.

Also, PEER staff and districts' staffs found MDE's website difficult to navigate. If information were easily obtainable from the website, MDE staff might receive fewer questions related to processes.

MDE's Contractors Perform Critical Functions, Sometimes Without Sufficient Accountability

In FY 2011, MDE's actual expenditures for contractual services totaled \$30,398,599. The category with the highest amount of expenditures was Fees, Professional, and Other Services, totaling approximately \$23.7 million, or nearly 78% of all of the department's expenditures for contractual services.

Use of Contractors to Perform Critical Departmental Functions

Although MDE's long-term needs include skills related to data, measurement, and evaluation throughout the education system, MDE has relied on contractors to perform critical functions in related areas such as the accountability model and school improvement evaluations. Because the department uses contractors to compensate for insufficient in-house skills in these areas, such contractors should be monitored carefully to assure that they are achieving the desired outcomes.

According to the Texas State Auditor's best practices guide for using a contract workforce, in developing a strategy for using contractors, MDE's Office of Human Resources should look to the overall goals and objectives in its strategic plan, both short- and long-term, then consider the skills workers currently have compared to the skills that will be needed in the future. Generally, permanent, full-time workers are those who have the skills that will be critical to the entity over the long run.

One of MDE's priority areas that will be critical to the department in the future is effective use of data. The future of the state's education system is based on solid data, measurement, and evaluation. However, MDE does not have sufficient in-house skills in these areas. For example:

- MDE contracts out primary responsibility for running the accountability model to two contractors, even though the accountability model is critical to the monitoring and improvement initiatives of the education system. The primary contractor is being paid approximately \$98,000 annually. MDE staff expects eventually to transition this responsibility to in-house staff.
- MDE contracts out responsibilities for school improvement evaluations, which require a team to assess districts and schools at risk of failing and provide recommendations to improve those districts and schools. In FY 2013, MDE will spend approximately \$2.9 million in state and federal funds on contracts for school improvement and conservatorship. A good evaluation of school improvement efforts requires a long-term investment in staff assigned to this function to monitor successfully the effects of changes implemented at the district and school levels.

Because these areas are critical to the education system, MDE should seek to have expertise in-house in the areas of data measurement and evaluation (see page 30). In-house experts would have the competencies necessary to write and monitor performance-based contracts, including high-quality performance measures and outcomes. These experts would also have the skills needed to audit those

contracts, particularly if outcomes are not achieved. (See “Staffing for Effective Use of Data,” page 57.)

Insufficient Accountability for Contractors’ Work in the Area of School Improvement

MDE does not always hold contractors accountable for producing desired results in the area of school improvement. In the seventy-three FY 2013 contracts related to school improvement that PEER reviewed, none defined performance requirements of the work in measurable, mission/objective-related terms. Also, contracts did not include quality assurance plans or incentives for better quality performance.

Performance-based contracts focus on performance measures or outcomes of delivering a service and may be tied to payment or contract extensions, depending on whether the contractor met the specified performance measures. A September 2002 report of the U. S. Government Accountability Office entitled *Contract Management: Guidance Needed for Using Performance-Based Service Contracting* stated that performance-based contracts should have the following attributes:

- *Describe the requirement in terms of results required rather than the methods of performance of work.* Performance work statements should be written to indicate what work is to be performed rather than how to perform it.
- *Set measurable performance standards.* Standards should be set in terms of quality, timeliness, and quantity.
- *Describe how the contractor’s performance will be evaluated in a quality assurance plan.* A good quality assurance plan should include a surveillance schedule and clearly state the surveillance methods to be used. The plan should focus on the quality, quantity, and timeliness of the performance outputs to be delivered by the contractor.
- *Identify positive and negative incentives, when appropriate.* Incentives should be used when they will induce better quality performance and may be either positive or negative, or a combination of both.

PEER staff reviewed all seventy-three 2012 contracts approved by the Office of School Improvement to determine whether MDE took steps to implement performance-based contracting at the agency, which PEER recommended in Report #539. The report had recommended that the Board of Education enhance accountability for contract staff by focusing on end results and elements of performance-based contracting and applying these principles when reviewing contracts.

All seventy-three contracts contained a description or statement of the work to be performed by contractors; however, none of the contracts exhibited the other three attributes of performance-based contracting:

- the performance requirements of the work were not defined in the contract in measurable, mission/objective-related terms;
- the contracts did not include a quality assurance plan; and,
- the contracts did not include incentives to induce better quality performance.

MDE has not followed PEER's 2010 recommendation and is not holding contractors accountable for results. Thus, MDE's ability to make informed decisions regarding approval or modification of contracts is compromised.

How could MDE better align its staff with its strategic priorities?

MDE has several opportunities to align its staff with the strategic priorities identified in this report. These opportunities will require MDE's upper management and Office of Human Resources to make staffing decisions based on achieving MDE's strategic priorities.

In order to align its staff with strategic priority areas, MDE should:

- practice strategic human resource management;
- classify and compensate employees appropriately;
- reallocate support positions based on needs;
- shift the focus of the role of the Office of Educational Accountability from financial accountability to increased accountability for MDE's programs and resources; and,
- fill staff skill gaps in pedagogy and data analysis, measurement, and evaluation.

This chapter addresses each of these recommendations.

Practice Strategic Human Resource Management

MDE's Office of Human Resources and upper management should practice strategic human resource management so that the optimal number of people with the necessary knowledge and skills are in place to accomplish MDE's mission and goals. For example, MDE should consider eliminating any currently vacant position that does not have a direct impact on the priority areas identified in this report.

According to State Personnel Board Policy 6.1, the State Superintendent of Education is responsible for the continual evaluation of the agency's mission and workload to ensure that staffing resources are consistent with legal authority, mission priority, and sound staffing management principles. Examples of actions the State Superintendent could take to ensure the maximum utilization of staffing positions include:

- conducting long-range agency organizational planning;
- recommending elimination of non-essential positions; and,
- recommending consolidation of positions and activities when duplication of functions is indicated.

To align its Central Office staff with its strategic priorities, MDE should begin thinking about how to allocate its resources most effectively rather than allocating them based on tradition or historical practice. MDE should evaluate positions, particularly before filling any vacancies, to determine whether each position is necessary to achieve the department's strategic goals. For example, upper management and MDE's Office of Human Resources should review the position responsibilities and determine whether that position has a direct impact on the priority areas identified in this report (i. e., improved instruction and effective use of data in decisionmaking). Managers should then consider whether that position could be eliminated or consolidated with another position. This process would help to "right-size" MDE by ensuring that the right number of people are in the right positions to accomplish MDE's strategic goals.

Also, MDE could develop a staff database to capture current information on the credentials, certifications, and professional development of its staff. This information could be used to determine who has the competencies needed for special projects or to fill skill gaps (see "Fill Staff Skill Gaps in Pedagogy and Data Analysis," page 56.)

Classify and Compensate Employees Appropriately

MDE should classify and compensate its employees appropriately based on their levels of responsibility and the skills needed to perform job duties successfully.

PEER analyzed the organizational chart of MDE, information provided by MDE Human Resources (including job descriptions and Job Content Questionnaires), and information provided by MDE's Budget Office to determine whether the department classifies and compensates its employees appropriately.

Narrow Span of Control

While State Personnel Board policies set the maximum number of managerial positions at forty-six for large agencies with a complicated organizational structure, MDE has 102 filled positions with managerial titles accounting for over \$4.8 million in salaries. Further, more than twenty employees with managerial titles have no subordinates. These findings call into question the assignment of job titles to MDE staff, some of which PEER found to be unjustified.

Span of control is defined as the number of subordinates that a manager directly supervises. Various factors affect the determination of an optimal span of control in an organization, including the complexity of the job (i. e., the more complex the job, the fewer employees the manager should supervise) and the similarity of jobs (i. e., the more

similar the job, the more employees the manager should supervise). Research shows that span of control affects communication, decisionmaking, employee morale, and resource allocation.

Upon reviewing the organizational chart provided by MDE Human Resources, PEER noticed a high number of employees with supervisory titles. After collecting information from MDE's Budget Office, PEER determined that MDE's managerial staff positions filled as of August 2012 include:

- 1 State Superintendent (currently filled on an interim basis);
- 2 Deputy State Superintendents;
- 4 Associate Superintendents;
- 8 Bureau Managers;
- 28 Bureau Directors;
- 13 Office Directors;
- 40 Division Directors; and,
- 6 Branch Directors.

Thus, the total number of MDE employees with managerial job titles as of August 2012 was 102, or 20% of total MDE Central Office staff. Annual salaries of staff with managerial titles represented approximately \$4.8 million in August 2012. Because MDE has been perceived in the past as a "top-heavy" organization, one might question whether this narrow span of control is necessary.

Although no magic number exists regarding optimal span of control, State Personnel Board Policy 6.3.4 outlines the hierarchy of positions in agencies with "a complicated organization and span of control" and places limits on the numbers of staff within each layer. Based on this SPB policy, all managerial levels have a limit of nine positions. Therefore, five layers of management plus the agency head would equal forty-six management positions at MDE. (See Exhibit 7, page 46.) When asked about the policy regarding span of control, State Personnel Board staff informed PEER that the maximum numbers outlined in SPB policy are suggestions for agencies to follow. When MDE submits its organizational chart to SPB each fiscal year, SPB does not require MDE to follow policy regarding span of control for approval of its organizational chart.

When large numbers of staff serve in managerial positions, generally the effect is that agencies become more bureaucratic, with more narrow spans of control. Communication may slow down as work moves through chains of command or across organizational lines.

PEER also noticed that many staff in these managerial positions have no subordinates and began to question the

basis for assigning job titles to these positions. According to MDE's organization chart, twenty-six employees with managerial job titles manage no subordinates and forty-two employees with managerial job titles manage one or two subordinates. If staff have managerial job titles without assuming managerial responsibilities, inequity exists among positions, as does the potential for pay without justification based on job duties, which is counter to the purpose of the state's classification system.

Exhibit 7: Comparison of MDE Staff with SPB Policy on Maximum Numbers of Managerial Positions

	SPB Policy	MDE Staff
Agency Head	1	1
EDUC Deputy State Superintendent	N/A*	2
EDUC Associate Superintendent	N/A*	4
EDUC Bureau Manager	N/A*	8
EDUC Bureau Director II**	9	28
Office Director**	9	13
Division Director	9	40
Branch Director	9	6
Section Chief	9	0
TOTAL	46	102

*The positions of Deputy State Superintendent, Associate Superintendent, and Bureau Manager are MDE-specific job titles and are not included in the SPB policy.

**In SPB policy, the Office Director is under the Agency Head, and Bureau Directors are under the Office Directors. However, because MDE has agency-specific positions, the EDUC Bureau Director II positions are over the Office Directors.

SOURCE: Analysis of SPB Policy 6.3.4 and SPAHRS data for August 2012.

PEER found instances where inequity might be perceived between positions. For example, a Bureau Director II in the Office of Child Nutrition is responsible for multiple divisions and fifty-four staff, while a Bureau Director II in the Office of Educational Accountability is responsible for no staff.

PEER also found instances in which position titles could be unjustified. Examples include:

- The job description for Bureau Director II states:

This is administrative work in which the incumbent serves as Director of a multiple Division Bureau within a very large agency, department, or institution. Work involves formulating, directing, and controlling the operations of a Bureau through Division Directors and highly specialized professional and technical personnel.

However:

- one incumbent with this title, being paid salary and fringe benefits of \$107,803 in general funds, does not direct or control operations through any personnel because there are no subordinates; rather, the incumbent handles miscellaneous requests from a superior and primarily works on accounting and budgeting activities;
 - another incumbent with this job title, being paid salary and fringe benefits of \$94,830 in general funds, has no subordinates and primarily provides technical assistance for a recruitment program; and,
 - another incumbent with this job title, being paid salary and fringe benefits of \$94,830 in federal funds, has one subordinate who performs support functions. The incumbent performs duties similar to those of a teacher recruiter.
- The job description for an Office Director II position states that the incumbent:

. . .serves as director of a major unit consisting of a number of multi-faceted divisions in a large state agency. The agency in which the incumbent is employed will have programs of statewide impact. The work performed will involve formulating, directing, and controlling the operations of a division through subordinate personnel.

However:

- one incumbent's salary plus fringe benefits is \$89,678 in federal funds based on the job duties, although the incumbent does not oversee a major program, as required in the job description; and,
- another incumbent's salary plus fringe benefits is \$82,459 in general funds. While

the incumbent oversees an important program, the incumbent has no subordinates.

- The job description for a Division Director II states:

This is administrative work in which the incumbent serves as director of a multiple branch division within a large-sized agency, department, or institution. Work involves formulating, directing and controlling the operations of a division through branch managers and other subordinate personnel.

- One incumbent with this title, being paid salary and fringe benefits of \$49,670 in federal funds, has no subordinates and does not direct or control a division or even a large program. The incumbent is primarily responsible for a minor assessment.
- One incumbent with this title, being paid salary and fringe benefits of \$66,584 in general funds, does not supervise multiple divisions. The incumbent performs licensing duties, as well as limited administrative tasks.

High Number of Non-State Service Positions

Exempt (i. e., non-state service) positions should be reserved for incumbents who determine and publicly advocate substantive program policy or who have a confidential working relationship with a key excluded official. Sixty-six of MDE's positions are exempt from the hiring and salary-setting authority of the State Personnel Board, although only eight of these positions report directly to the State Superintendent.

State law exempts some staff positions from the hiring and salary setting authority of the State Personnel Board based on their levels of responsibility for determining and advocating substantive public policy or for having a confidential working relationship with a key excluded official. MISS. CODE ANN. Section 37-3-13 (2) (1972) states:

. . . deputy superintendents, associate superintendents and directors shall be selected by and hold office subject to the will of the State Superintendent of Public Education subject to the approval of the State Board of Education. All other personnel shall be competitively appointed by the State Superintendent and shall be dismissed only for cause in accordance with the rules and regulations of the State Personnel Board.

The State Board of Education shall set the salary of the deputy superintendents, associate superintendents and divisional directors. . . .

MISS. CODE ANN. Section 25-9-107 (c) (xvi) (1972) designates which positions within Mississippi state government may be considered “non-state service” and states that these positions may include:

. . . top level positions if the incumbents determine and publicly advocate substantive program policy and report directly to the agency head, or the incumbents are required to maintain a direct confidential working relationship with a key excluded official.

As noted on page 45, the number of exempt positions of MDE “directors,” as identified in MISS. CODE ANN. Section 37-3-13 (2) (1972), should be limited to nine, according to State Personnel Board policies regarding span of control. However, MDE has sixty-six non-state service positions (including both filled and unfilled positions) that are exempt from the hiring and salary-setting authority of the State Personnel Board. They are:

- 1 State Superintendent of Education;
- 3 Deputy State Superintendents;
- 5 Associate Superintendents;
- 1 Accountability Director;
- 1 Superintendent, School for the Blind;
- 1 Superintendent, School for the Deaf;
- 1 Director, School of the Arts;
- 1 Chief Systems Information Officer;
- 6 School Finance Officers;
- 10 Bureau Managers; and,
- 36 Bureau Director II positions.

According to MDE’s organizational chart dated September 2012, eight of the sixty-six non-state service positions report directly to the State Superintendent of Education.

Employees hired into non-state service positions under MISS. CODE ANN. Section 37-3-13 (2) (1972) are not required to be selected from a Certificate of Eligibles⁸ as are other employees. Also, non-state service employees may be paid up to twenty-five percent above the starting

⁸ A *Certificate of Eligibles* is a list that the State Personnel Board provides to agencies for selection decisions. The list includes the names of applicants who received the highest scores on their applications as determined by the State Personnel Board.

salary of their positions (i. e., “Agency Head Flexibility”). Requests for Agency Head Flexibility increases must be submitted to SPB with the following documentation:

- online description of the amount awarded; and,
- a signed statement from the employee acknowledging the non-state service status, the amount of salary increase, and the subsequent salary withdrawal upon removal from non-state service status.

The MDE Human Resources Office notes that MDE has not used Agency Head Flexibility since at least 2010.

All requests for salary increases for state service employees must be justified and submitted by MDE as outlined in the SPB Policy and Procedures Manual for approval by SPB. However, the State Superintendent has the opportunity to hire or promote (or terminate) non-state service employees without a competitive selection process. The potential exists for more frequent increases in salaries of non-state service positions and for increases of higher amounts than state service positions. Therefore, non-state service positions can have a significant impact on the department’s budget.

PEER maintains that all MDE employees, excluding the State Superintendent and employees who work under the direct and confidential control of the State Superintendent (i. e., report directly to the State Superintendent), should be subject to the authority of the State Personnel Board. Until this is accomplished, the employees are not subject to the same hiring and salary setting terms of employment.

Job Descriptions Not Aligned With Actual Work Performed

In the offices reviewed, PEER found that State Personnel Board job descriptions and associated pay ranges for MDE staff were not always commensurate with employees’ actual responsibilities as described in interviews with staff and/or Job Content Questionnaires.

The job classification system is a way of establishing pay ranges using a consistent method rather than discretion. According to Mississippi State Personnel Board Policy 5.1:

. . . assignment of a position to an occupational classification shall be based upon job analysis data, to include the Job Content Questionnaire (JCQ) or the Role Description Questionnaire (RDQ), professionally accepted principles and guidelines for position classification, and review of class specifications.

Thus, the JCQ is the primary instrument by which agencies classify employees into positions. Also, according to State Personnel Board Policy 5.17.6, the JCQ or RDQ is the

primary instrument for recording the job analysis data in support of a promotion. The JCQ or RDQ is more specific regarding actual duties within specific agencies, but is expected to be in alignment with SPB's job description, which is more general in nature.

PEER staff found no dates or signatures on the majority of JCQs provided by MDE. MDE's Human Resources Director told PEER staff that JCQs are electronically submitted to the Office of Human Resources. However, the State Personnel Board Performance Development System Operations Manual requires the employee and supervisor to sign and date the JCQ document and forward a copy to the Office of Human Resources. The employee is to retain a copy of the JCQ and the supervisor is to keep the original copy in the employee's performance folder.

Also, many were missing information, particularly from supervisors. The JCQ asked questions of staff that should instead be determined by MDE's Office of Human Resources staff. For example, one question asks, "What education, special training, experiences or licenses are required for satisfactory job performance?" PEER staff found instances where the incumbent and the supervisor answered this question differently. The Office of Human Resources is ultimately responsible for determining the necessary qualifications required for satisfactory job performance; however, the JCQ does not always state the necessary qualifications.

For these reasons, PEER staff interviewed some MDE staff members regarding their job responsibilities. In some cases, the difference in the job responsibilities and the job descriptions was considerable. For example, the job description for a Business Systems Analyst II position says that the incumbent is "responsible for designing, testing, implementing, and maintaining new applications systems and upgrading and/or maintaining existing systems." The position is clearly technical, as one of the educational requirements accepted is a degree in computer science, data processing, or business information systems. The incumbent's salary is \$63,255 in general funds based on the job duties; however, the incumbent of this position handles duties unrelated to the job description, including day-to-day accounting, monitoring expenditures of contracts, and preparing board items for meetings.

The State Personnel Board's Policy and Procedures Manual, 5.2.1, states that the Personnel Board's Executive Director shall assign salary ranges to occupational classes in recognition of the relative level of duties and responsibilities assigned to positions in an occupational class. Thus compensation of employees should reflect the job duties. A primary goal is to provide equity in the system, so that people who perform similar duties,

whether in the same agency or not, are compensated on a similar pay scale.

Mississippi's Variable Compensation Plan (VCP), which began in FY 1982, is a valid method of paying state employees on a basis that reflects the labor market as well as employees' job performance. (See Appendix C, page 64, for description of VCP elements.) However, currently the VCP is not fully funded; therefore, it might be that MDE uses the classification system to offset the lack of full VCP funding. If MDE misclassifies its employees and pays them at a higher rate than job duties warrant, less money is available for resources to devote to priority areas.

Steps to Classify and Compensate Employees Appropriately

MDE's upper management and the Office of Human Resources should carefully evaluate vacant positions—both those currently vacant and those that become vacant in the future—before filling them in order to transition gradually to a staff that is classified and compensated appropriately based on job duties.

Before filling any future positions, MDE's upper management and Office of Human Resources, along with advice and perspective from lower level managerial staff, should answer the following questions related to the positions:

- Does the job description match actual job duties? If not, the position should be reclassified or the job duties should be modified to reflect the job description.
- Does the Job Content Questionnaire match the job description? If not, the position should be reclassified or the job duties should be modified to reflect the job description.
- Does the Job Content Questionnaire match actual job duties? If not, the incumbent and supervisor should accurately complete the Job Content Questionnaire.
- Does the position have a clear impact on the priority areas of improved instruction and effective use of data? If not, the position should be considered for deletion or combined with another position. Another option would be to modify the job duties to have a more direct impact on priority areas.
- Is the position appropriately placed in the organizational chart according to level of responsibility outlined in the Job Content Questionnaire and the job description? If not, the position should be re-assigned within the organizational chart.

By answering these questions, MDE could gradually transition to a staff that is classified and compensated appropriately based on the job duties. Also, by removing

positions not aligned with the priority areas, MDE could shift resources to the priority areas to be better prepared for the future in education.

Reallocate Support Positions Based on Needs

MDE should take advantage of ways to cross-train and reallocate support positions across the agency based on needs.

After reviewing the organizational chart and conducting interviews with staff, PEER determined that the following job titles generally represent support staff at MDE:

- administrative assistants;
- secretaries; and,
- special projects officers.

As of August 2012, MDE had seventy support positions out of 505 total filled positions. The total annual salaries for these support positions are projected to exceed \$2 million for FY 2013, as shown in Exhibit 8, below.

Exhibit 8: MDE Support Position Projected Salary Plus Fringe Benefit Expenditures, FY 2013

Position Title	Projected Salary Expenditures for FY 13
Administrative Assistants	\$ 348,127.17
Secretaries	245,230.75
Special Projects Officers	1,437,258.15
TOTAL	\$2,030,616.07

SOURCE: SPAHRS data for August 2012.

Support positions are necessary to assist with administrative tasks such as answering the telephone; however, they do not directly contribute to improvement of instruction or use of data in decisionmaking. Therefore, MDE should consider ways to provide efficiency in this area. In particular, MDE should consider reallocating support staff to different offices based on needs.

Some offices need more support staff than others. For example, the Office of Licensure has five support staff that stay busy in handling phone calls and routine license processing duties, particularly in the peak summer months when MDE is processing license applications. In the past, MDE has hired up to four contract workers during peak

months to provide additional support for this office. In the summer of 2012, MDE hired two contract workers for support of the Office of Licensure.

Conversely, an office like Instructional Enhancement (which includes Curriculum and Instruction) might not warrant as many support staff. This office does not handle as many routine duties as the licensing office, yet it also has five support positions.

The number of support positions in an office should reflect the level of routine administrative duties performed in that office. By having a high number of support staff, MDE has less financial resources to devote to other areas that more directly impact the education system. By having support personnel in offices where they might be underutilized, MDE is wasting an opportunity to place them in areas where they are needed and potentially wasting money by hiring contract workers to serve in support roles. Allowing support staff mobility between offices would give them opportunities to expand their knowledge and skill sets in other areas within the agency.

MDE upper management and Office of Human Resources should work with bureau and division directors to identify opportunities for cross-training of support staff so that they can be reallocated across offices as needed.

Shift the Focus of the Role of the Office of Educational Accountability

MDE's Office of Educational Accountability should shift its focus from financial accountability to increased accountability for MDE programs and resources, as required by state law.

In its 2010 report, PEER described the Office of Educational Accountability as an office established through MISS. CODE ANN. Section 37-151-9 (1972) and charged with the responsibilities of monitoring and reviewing the programs and activities provided through MDE, while ensuring to the Board of Education that the department is accountable for programs and resources. Specifically, according to MISS. CODE ANN. Section 37-151-9 (2) (1972), MDE's Office of Educational Accountability is responsible for:

. . . monitoring and reviewing programs developed under the Education Reform Act, the Mississippi Adequate Education Program Act of 1994, the Education Enhancement Fund, and subsequent education initiatives, and shall provide information, recommendations and an annual assessment to the Legislature, Governor, Mississippi Commission on School Accreditation and the State Board of Education. Commencing in

1995, the annual assessment of education reform programs shall be performed by the Office of Educational Accountability by December 1 of each year. The Office of Educational Accountability shall specifically monitor the implementation of Level III accreditation in all school districts, and shall make an assessment with recommendations to the 1996 Regular Session of the Legislature.

Further, according to MISS. CODE ANN. Section 37-151-9 (3) (1972), the Office of Educational Accountability has the following responsibilities:

- (a) Developing and maintaining a system of communication with school district personnel;*
- (b) Provide opportunities for public comment on the current functions of the State Department of Education's programs, needed public education services and innovative suggestions;*
- (c) Assess both positive and negative impact on school districts of new education programs, including but not limited to The Mississippi Report Card and alternative school programs.*

PEER recognized an opportunity, through a departmental reorganization in 2010, for MDE to shift the responsibilities of this office from financial accountability to program accountability. Although PEER recommended in 2010 a shift from financial to program evaluation for this office, only one staff person in this office is responsible for program evaluation. His role has been to focus on cost savings (e. g., analyzed MDE costs associated with meals for conferences and other meetings) rather than full program evaluations. The sole staff member in the program evaluation office was relocated to another office (leaving the program evaluation position vacant) to assist with working on the statewide accountability system. That staff member has returned to the program evaluation position and has begun performing an audit of the Career and Technical Education program within the state. However, since PEER's last review in 2010, no program evaluations have been completed.

The director of the office is a certified public accountant and the office has historically focused on its financial auditing role; however, the lack of an active program evaluation function at the department limits the office's ability to play a critical role in accountability for MDE resources.

Because the state invests a significant amount of money in education, it is imperative that MDE justify its programs and resources. Program evaluations should include an indication of whether responsible parties meet the goals

and objectives specified in the strategic plan, along with the cost of achieving those objectives.

Fill Staff Skill Gaps in Pedagogy and Data Analysis

MDE should continue transitioning its staff's skill sets toward improving instruction and using data effectively in order to shift focus to strategic priority areas and be prepared for the future in education.

As described previously, MDE lacks resources devoted to improving curriculum and instruction statewide and data measurement analysis. Because these are key areas in education and provide for the best opportunities to impact the priorities of the education system, MDE should seek to reallocate resources to these areas.

Staffing for Improved Instruction

MDE's efforts to improve instruction should include a larger team of pedagogy experts in all major curriculum areas. These experts should be involved in a range of activities to improve alignment of instruction with the standards and assessments (e. g., collecting data to determine which instructional strategies are effective and under what conditions, utilizing technology to provide direct information and resources to school-level educators and administrators).

Based on its strategic priorities, MDE's instruction improvement function should include a larger team of pedagogy experts in all major curriculum areas. Currently, MDE lacks content and pedagogy experts in the Office of Curriculum and Instruction for reading and science. The content specialists in the areas of English/language arts and math are specialized in secondary education; therefore, English/language arts and math specialists with a background in elementary education are needed.

This team of experts should be focused on improved instruction through the alignment of instruction to the standards and the assessments. Efforts could include:

- certifying curriculum and instructional materials from outside sources for use by teachers in the state;
- providing state-supported instructional strategies to districts, schools, and teachers;
- providing technical assistance to districts and schools based on their needs related to curriculum development and use of materials;
- providing professional development to district curriculum coordinators and ensuring competency of those coordinators in providing training to school-level staff;

- conducting curriculum audits to assess the level of alignment among curriculum, assessments, and instruction;
- collecting data to determine which instructional strategies are working and under what conditions, then sharing that information with districts, schools, and teachers, as well as using this information in school improvement/turnaround efforts;
- collecting longitudinal data to determine to what extent efforts to implement alignment of instruction have affected student learning; and,
- using technology to provide more direct information to principals and teachers. For example, a teacher recognized for exceptional instruction could be video-recorded during a class to demonstrate instruction on a specific standard and that video could be shared electronically with all teachers in the state.

This team of specialists could also be used to review assessment items, rather than having contractors do so.

Because PEER's review did not include an evaluation of all skill sets of all employees at MDE and because MDE does not maintain an inventory of employee skills, PEER does not know whether the skills sets are available at MDE to fill these areas. However, PEER recommends a competitive process for employing a team of content and pedagogy experts to assist districts, principals, and teachers across the state more effectively. Content and pedagogy experts should have knowledge in not only the subject area, but have knowledge related to principles and methods for curriculum and training design, teaching, and instruction. Experts should have skills related to selecting and using training/instructional methods and procedures appropriate for the situation when learning or teaching new concepts.

Staffing for Effective Use of Data

MDE's efforts to use data effectively should include a team of researchers and data analysts responsible for a statewide research agenda, longitudinal databases, and ensuring that analytical tools are available to improve decisionmaking in the areas of instruction and student learning.

MDE has a need for more in-house staff who are experts in measurement (e. g., psychometrician or person with a background in educational research methods, staff with experience in manipulating data) and the effective use of data to improve instruction and student learning. MDE should have a team responsible for the longitudinal database and a research agenda for the education system. The team should include researchers and data analysts

focused on improvement of the education system. Efforts could include:

- creating a research agenda for the state by developing questions focused on continuous statewide improvement in education;
- working with state universities and colleges to support educational research efforts;
- providing professional development to MDE staff and districts on the use and capabilities of longitudinal data; and,
- ensuring that districts, schools, and teachers have the data analysis tools necessary for improving instructional practice and student learning.

MDE should appoint a data technical assistance coordinator to ensure that effective use of data is central to MDE's efforts. Further, all MDE staff should have an understanding of data related to their specific programs. Staff should offer recommendations for research and should use data to recommend policy changes and inform stakeholders. The technical assistance coordinator should provide professional development for MDE staff to ensure that they understand what data is available and how it can be used. According to MDE staff, MDE is recruiting to fill a statistician position but has not yet found an individual with the desired expertise. The individual hired for this position might be a suitable candidate for the data technical assistance coordinator.

Mississippi has university programs that would offer recruitment opportunities in data analysis. For example, MDE could recruit staff from Mississippi State University's doctoral program in Educational Psychology or the University of Southern Mississippi's doctoral program in Research, Evaluation, Statistics, and Assessment or master's program in Educational Studies and Research.

Appendix A: Snapshot of the Status of Education in Mississippi

The status of education in Mississippi may be measured by the number of students achieving proficiency on state assessments (i. e., Mississippi Curriculum Test, Subject Area Tests) as well as the National Assessment of Educational Progress.

Mississippi Curriculum Test (MCT2)

The Mississippi Curriculum Test (MCT2) is given to students in grades 3 through 8 in the areas of reading/language arts and math. There are four levels of performance on each test: *minimal*, *basic*, *proficient*, and *advanced*. According to MDE, students at the proficient level are able to perform at the level of difficulty, complexity, or fluency specified by the grade-level content standards. Students at the basic level are able to perform some of the content standards at a low level of difficulty, complexity, or fluency as specified in the grade-level content standards, while advanced level students perform at a high level. Thus, it is preferable, although unlikely, that all students perform at the proficient level.

Exhibit 9, page 60, shows the percentage of Mississippi students scoring proficient or above on the MCT2 for the 2010-11 school year.

Exhibit 9: Percentage of Mississippi Students Scoring Proficient or Above on the Mississippi Curriculum Test (MCT2) for the 2010-11 School Year

Grade Level	Percent Scoring Proficient or Above
Language Arts	
3	53%
4	54%
5	51%
6	54%
7	54%
8	51%
Math	
3	64%
4	58%
5	58%
6	55%
7	62%
8	66%

SOURCE: The Mississippi Assessment and Accountability Reporting System (MAARS).

Subject Area Test (SATP2)

The Subject Area Test (SATP2) consists of four end-of-course assessments. According to State Board Policy 3803, students must pass subject area tests as a requirement for graduation. Students are assessed on content at the completion of the course in U.S. History, Biology I, Algebra I, and English II.

Exhibit 10, below, shows the percentage of Mississippi students scoring proficient or above on the SATP2 for the 2010-11 school year.

Exhibit 10: Percentage of Mississippi Students Scoring Proficient or Above on the Subject Area Tests (SATP2) for the 2010-11 School Year

Test	Percent Scoring Proficient or Above
U.S. History	61%
Biology I	55%
Algebra I	77%
English II	57%

SOURCE: The Mississippi Assessment and Accountability Reporting System (MAARS).

National Assessment of Educational Progress (NAEP)

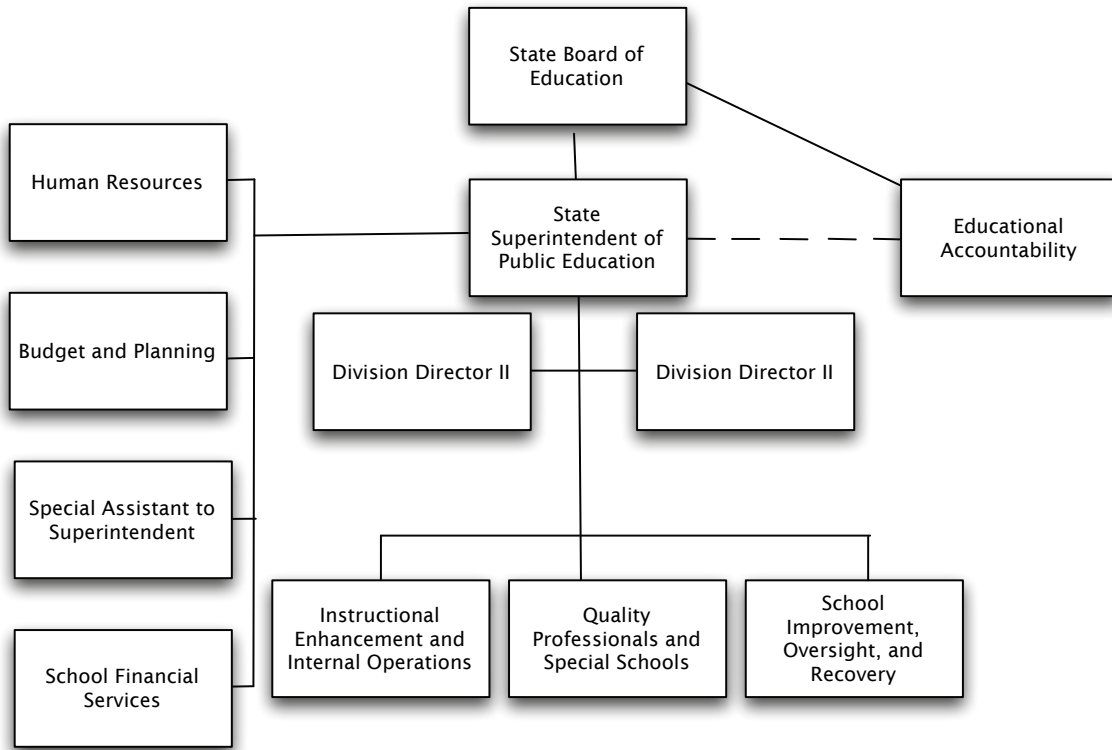
One of MDE's three goals is to reach the national average on the National Assessment of Educational Progress (NAEP) by 2013. NAEP measures student learning for a representative sample of students in grades 4, 8, and 12 in several content areas. Exhibit 11, page 62, shows the percentage of Mississippi students scoring proficient or above on each content area for the most recently reported data.

Exhibit 11: Percentage of Mississippi Students Scoring Proficient or Above for the Most Recently Reported Data on the National Assessment of Educational Progress (NAEP)

Grade and Subject Area	Percent Scoring Proficient or Above
Grade 4 Reading (2011)	22%
Grade 8 Reading (2011)	21%
Grade 4 Math (2011)	25%
Grade 8 Math (2011)	19%
Grade 4 Science (2009)	17%
Grade 8 Science (2011)	19%
Grade 8 Writing (2007)	15%

SOURCE: NAEP State Profiles for Mississippi.

Appendix B: Truncated Organizational Chart of the Mississippi Department of Education



SOURCE: Analysis of Mississippi Department of Education organizational chart, September 1, 2012.

Appendix C: Description of Mississippi's Variable Compensation Plan

Mississippi's Variable Compensation Plan (VCP), which began in FY 1982, is a method of paying state employees on the basis of their job worth and performance. The plan's key components are:

- *Realignment*--ensures that the pay ranges for jobs compensate incumbents what they are worth in the relevant labor market;
- *Productivity or merit pay*--pays employees for their high productivity, as indicated by job performance measures;
- *In-service*--increases pay to provide employees with cost of living adjustments; and,
- *Longevity*--provides lump-sum payments to employees who cannot receive a realignment or in-service pay raise because the raise would take them beyond the authorized end step salary for their job class.

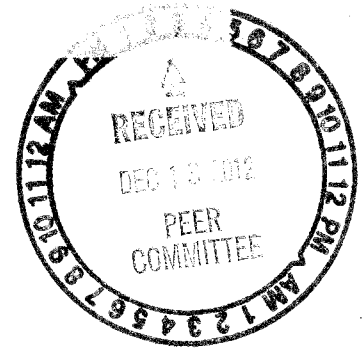
The Legislature has not consistently funded the state's VCP. Most VCP increases over the years have been in the area of realignment.

SOURCE: Mississippi State Personnel Board.



**STATE OF MISSISSIPPI
DEPARTMENT OF EDUCATION**

Lynn J. House, Ph.D.
Interim State Superintendent of Education



December 13, 2012

Dr. Max K. Arinder
Executive Director
Joint Committee on Performance
Evaluation and Expenditure Review
P.O. Box 1204
Jackson, Mississippi 39205

Dear Dr. Arinder,

Thank you for the willingness to provide the requested follow-up review for the Mississippi Department of Education (MDE) related to staffing issues noted in the PEER report of 2010, *Opportunities for Improving the Accountability of the Mississippi Department of Education*. Your staff was most helpful and highly professional in their work with MDE staff and school districts, and their efforts are most appreciated.

MDE staff members have worked diligently to make progress on the recommendations of the previous 2010 report and will do the same with the current information. As noted in the response to the 2010 report, many of the recommendations will take time to fully implement, but progress has been made in staffing, reporting, performance-based contracting, and alignment with the goals of the State Board of Education.

Subsequent to the PEER Report of 2010, the MDE requested a review of agency staffing patterns. Since this follow-up review was initiated by the MDE and was of a limited nature due to constraints of personnel and time, I hope that we can ensure that this fact is made clear in the report to the Committee.

After examination of the preliminary report from the 2012 limited review, the MDE respectfully submits the attached response to the report. We hope that the detailed response will clarify the current status of several areas mentioned and expand the understanding around the critical issues noted. I would also like to briefly respond to several of the specific areas of concern where we feel more clarification is needed:

I. Impact on instruction

- a. Training on the Common Core State Standards is ongoing and covers the range of information from basics of what the standards are to how to prepare for assessments. Training will continue using multiple methods from webinars to face-to-face sessions.
- b. Not enough staffing in critical areas such as reading is a direct result of funding cuts over the last several years; positive impact on instruction will only occur with more opportunities for job-embedded training for teachers and principals followed by appropriate implementation at the local level.
- c. Use of contractual services has been the best mechanism for securing the expertise needed to assist with training and follow-up across a range of programs which impact classroom instruction. The MDE did not have enough funding or appropriate Position Identifiable Numbers (PINs) for the needed full time staff to be added to fulfill the roles undertaken by individuals under contract.
- d. Additionally, two educators-in-residence have been utilized to ensure that the perspective of the practitioner is considered within the decision-making structure of the MDE. These individuals have proven invaluable to ensuring that planned training and technical assistance is of benefit to teachers, principals, and other administrators.

II. Staffing

- a. Titles of all staff are in line with the Mississippi State Personnel Board requirements.
- b. At some levels, directors guide programs and processes rather than staff. The wave of the future is that a limited number of staff will utilize technology and a teaming approach to get work done rather than simply adding staff at lower levels. This “right-sizing” effort is both efficient and effective in attracting and retaining staff with appropriate knowledge and skills especially those who can handle the technical aspects of accountability and can positively impact instruction and leadership in the classroom and school.
- c. Hiring non-state service professionals who clearly understand “will and pleasure” allows staff with a higher degree of skill to become MDE employees and to be held accountable for results. This practice also allows the MDE to be responsive to the fluidity in funding as needed based on state revenues. Additionally, employees who are paid from federal grants or other temporary sources are placed into time-limited positions to ensure that if funding ceases, the employment would also cease. Employment of these individuals is in line with acceptable practice as determined by the MS State Personnel Board.

III. Efficiencies

- a. As noted in the PEER report from 2010, performance-based contracting provides a good model for state agencies to utilize. With this in mind, the MDE no longer issues multi-year contracts; all contracts that have the potential to be renewed are reviewed annually to ensure that deliverables are acceptable, and to determine if any changes need to be made to the scope of work.
- b. Other cost-saving measures have included the elimination of some positions and realignment of others to support the revised goals of the State Board of Education. All of the efficiencies put in place since 2010 have resulted in savings of nearly six million dollars.

Further details around this clarifying information may be found in the attached response.

Again, I want to express my thanks to the PEER staff for their work and professionalism in conducting the limited review of staffing at the Mississippi Department of Education. Your assistance is greatly appreciated, and the feedback will guide us in determining how best to improve the efforts of all staff within the Mississippi Department of Education.

Sincerely,



Lynn J. House, Ph.D.
Interim State Superintendent of Education

C: Dr. O Wayne Gann, President
State Board of Education

Mr. John Gilbert, CPA
Director, Educational Accountability

Additional information and exhibits accompanying the agency response are available at www.peer.state.ms.us

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