

MISSISSIPPI

Office of Dropout Prevention

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SHAD WHITE

State Auditor

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Executive Summary

A Forgotten Program: A Review of the Mississippi Department of Education's Office of Dropout Prevention

The Office of Dropout Prevention has not existed according to statute in over a decade

Key Conclusions

The Office of Dropout Prevention (ODP) was statutorily mandated to be created by the Mississippi Department of Education (MDE) in 2006 to reduce the dropout rate. Auditors determined that:

1. MDE has not adhered to Miss. Code Ann. § 37-13-80 since 2009;
2. MDE maintained inapplicable graduation rate benchmarks when reporting progress to the State Board of Education;
3. MDE has been apathetic regarding oversight of a coordinated initiative to reduce the dropout rate;
4. 73% of local school districts' dropout prevention plans do not meet requirements set forth by MDE;
5. 49% of local school districts' dropout prevention programs are not being monitored by MDE;
6. 71% of local school districts' dropout prevention programs are not evidence-based; and
7. MDE does not monitor whether evidence-based programs are implemented as designed to ensure effectiveness.

To reach these conclusions, auditors conducted surveys of local school districts, interviewed officials at MDE and local school districts, analyzed financial and program records, and reviewed internal and leading professional practices, as well as peer-reviewed journal articles regarding dropout prevention.

Recommendations Summary

The report includes six (6) recommendations to MDE and four (4) recommendations for the Legislature's consideration. Including sub-recommendations, a total of twenty-eight (28) recommendations were made. MDE agreed with 68% (19 of 28) of these recommendations. Recommendations include:

- re-establishing the Office of Dropout Prevention;
- hiring a director for the Office of Dropout Prevention;
- reviewing and updating the *Statewide Dropout Prevention Plan* and Administrative Code (Title 7, Part 3, Chapter 30) to accurately reflect the current state of dropout prevention in Mississippi, including the prioritization of evidence-based dropout prevention programs;
- annually approving local dropout prevention plans;
- developing policies/procedures that address technical assistance, the transfer of institutional knowledge during leadership changes, and oversight of the collaborative effort to address the dropout rate within MDE;
- developing a webpage specifically for the Office of Dropout Prevention;
- creating policies, procedures, and guidelines to ensure evidence-based dropout prevention programs are implemented as designed;
- collecting data to measure evidence-based dropout prevention program implementation progress to identify areas for improvement that can be shared with policymakers; and
- amending Miss. Code Ann. § 37-13-80 to increase the graduation rate goal, benchmark years, and establish an oversight mechanism.

Office of Dropout Prevention, "Lost in Transition"

The Office of Dropout Prevention has not existed as required by statute since 2009

- No Office of Dropout Prevention
- No Director for the Office of Dropout Prevention
- No Adherence to the *Statewide Dropout Prevention Plan*
- No Annual Evaluation of Local Dropout Prevention Plans

MDE overstated their progress toward meeting the statutorily mandated graduation rate goal of 85% to the Mississippi Board of Education.

Criteria:

In 2006, the Legislature passed Miss. Code Ann. § 37-13-80,¹ which required MDE to establish the Office of Dropout Prevention (ODP). The law also outlined the following MDE directives:

- administer a statewide dropout prevention program;
- annually approve each local school districts' dropout prevention program;
- provide technical assistance upon written request from local school districts regarding the implementation of their dropout prevention plans;
- collaborate with program offices within MDE to decrease the state's dropout rate;
- increase the graduation rate to not less than 85% by the 2018-2019 school year; and
- establish benchmarks for each two-year period from the 2008-2009 school year through the 2018-2019 school year to serve as a guideline for increasing the graduation rate for cohort classes on a systematic basis to 85%.

The statute goes on to specify that *within* the Office of Dropout Prevention, there should be an Office of Compulsory School Attendance (OCSA) (Miss. Code Ann. § 37-13-81) which is responsible for enforcing the Mississippi Compulsory School Attendance Law.

In order to comply with the statutory requirement to administer a statewide dropout prevention program, MDE developed the *Statewide Dropout Prevention Plan* in 2007. MDE explicitly states within the plan that "schools alone cannot achieve solutions to the complex problem of dropouts,"² and that the agency has "taken the lead in establishing guidelines to combat dropout prevention."³ According to the plan, MDE's responsibilities and goals include, but are not limited to, the following:

- establishing two-year benchmarks in order to attain the 85% goal by 2018-2019 as outlined in statute;
- maintaining a department-wide, coordinated initiative that addresses dropout prevention as stipulated in statute;
- annually evaluating local school districts' dropout prevention plans per statute, "based on the evaluation criteria set forth in the local district plan (LDP) and the MDE's overall evaluation criteria;"⁴ and

¹ Miss. Code Ann. § 37-13-80

² MDE's *Statewide Dropout Prevention Plan*, released February 2007, p. 7.

³ Ibid.

⁴ MDE's *Statewide Dropout Prevention Plan*, released February 2007, p. 22.

- providing general technical assistance⁵ to school districts on dropout prevention, as well as attendance, implementation of the three-tier instructional intervention policy,⁶ and effective educational programs for students with disabilities.

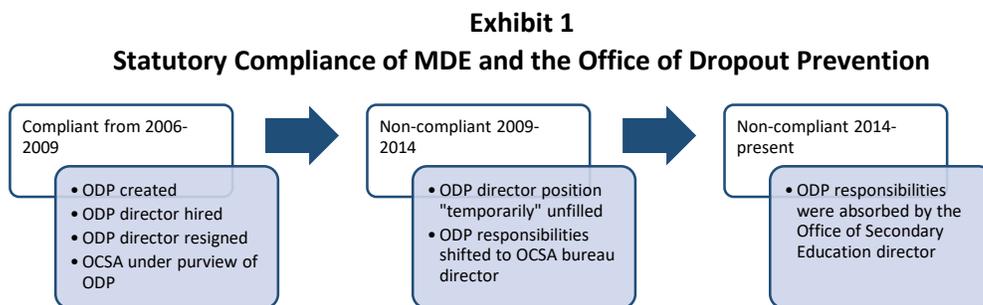
Condition, Cause, and Effect:

Office of Dropout Prevention

Upon review of MDE’s current and historical organizational structure, auditors discovered that the ODP has not existed as required by statute since 2009 when the original director of the ODP resigned. MDE reorganized and the duties of the ODP director were assigned to the bureau director of the OCSA, which is the opposite of what is required by law. By statute, OCSA is required to be administered by the ODP director, and according to the OCSA director in place at the time, this reorganization was intended to be temporary. Yet the state superintendent of education never corrected the issue. In 2014, the responsibilities were then absorbed by the Office of Secondary Education as shown in Exhibit 1 below.

Statewide Dropout Prevention Plan

Auditors learned that those currently responsible for implementation of the *Statewide Dropout Prevention Plan* were completely unfamiliar with the document.⁷ According to MDE, the requirements outlined in statute regarding the ODP and the *Statewide Dropout Prevention Plan* were “lost in transition.” That is, leadership changes over time resulted in the loss of institutional knowledge. In fact, MDE failed to rely on former ODP leaders who remained with the agency to ensure that institutional knowledge was relayed appropriately in order to maintain, develop, and propel the *Statewide Dropout Prevention Plan* forward. Hence, the plan was ultimately forgotten and is presently unused.



Source: Prepared by auditors using data provided by MDE

MDE has failed to follow statute and administrative code in many ways, including failure to keep the appropriate records. This was displayed when, during the audit, requested records that should have been sent to the Mississippi Department of Archives and History (MDAH) were found to be missing. According to MDE officials, the records in question were sent to MDAH per the records management law and records control schedule. However, upon review of MDE’s records at MDAH, auditors discovered that there is a 36-year gap (1975-2011) in which MDAH received no records from MDE.

Further, in the summer of 2015, MDE’s main office suffered from a building fire that damaged many records. After the fire, all files that were “no longer needed” were discarded due to “limited storage space.” MDE’s dropout prevention files were discarded, including some which were not damaged by the fire.⁸ The full extent of what was discarded is

⁵ Note: MDE’s statutory obligations regarding technical assistance are limited to being offered when school districts make a written request regarding the implementation of their dropout prevention programs. However, MDE chose to expand their responsibilities within the dropout prevention plan, a regulatory document which obligates them to fulfill these responsibilities.

⁶ Intervention Services [MS Department of Education]. (n.d.). Retrieved from <https://www.mdek12.org/OAE/OEER/InterventionServices>

⁷ Sections of the *Statewide Dropout Prevention Plan* outlined in MDE’s administrative code have been outdated since 2009 and should be reviewed every five years in accordance with Miss. Code of 1972 Annotated § 25-43-3.114.

⁸ The Department of Archives and History should be contacted to review materials before being destroyed according to the records management law (Miss. Code Ann. § 25-59-15).

unclear. MDE’s missing files are due to insufficient internal controls, which prevents the maintenance of important records.

- **Graduation Rate Benchmarks**

Miss. Code Ann. § 37-13-80 stipulates that the graduation rate, which was 61.1% in 2006,⁹ must be increased to 85% by the 2018-2019 school year (an increase of 23.9 percentage points). To comply with this statute, MDE established benchmarks to systematically increase the four-year graduation rate from 61.1% to 85%.

MDE Benchmark Timeline

| | |
|----------------|---|
| February, 2007 | <p>Statewide Dropout Prevention Plan released</p> <p>The Plan included 2-yr. benchmarks based on the 61.1% graduation rate, which was calculated to include “repeaters” (students who repeat the 12th grade and are calculated in two separate cohorts).</p> <p>At the time, MDE was 23.9 percentage points away from meeting the 85% goal outlined in statute.</p> |
| March, 2007 | <p>The State Board of Education approved Mississippi State Information System (MSIS) change, which excluded repeaters from graduation rate calculations.</p> |
| April, 2007 | <p>MDE officially changed the procedure for calculating graduation and dropout rates to exclude repeaters. All benchmarks and the 85% goal were rendered obsolete.</p> <p>Note: MDE performed a special run of the graduation rate calculation to exclude repeaters for accountability year 2007. MDE elected to maintain the graduation rate retroactively, following the adoption of the new calculation. The graduation rate went from 61.1% in accountability year 2006 to 70.8% in accountability year 2007 (an increase of 9.7 percentage points in one year).</p> |

The benchmarks established by MDE are outlined as follows in the *Statewide Dropout Prevention Plan*:

“The 4-year cohort graduation rate for 2004-2005 is 61.1%. In order to attain the 85% goal by 2018-2019, the following two-year benchmarks are established:

- Benchmark 1 – 2008-2009 63%
- Benchmark 2 – 2010-2011 66%
- Benchmark 3 – 2012-2013 71%
- Benchmark 4 – 2014-2015 77%
- Benchmark 5 – 2016-2017 81%
- Benchmark 6 – 2018-2019 85%”

Two months following the release of MDE’s Board approved *Statewide Dropout Prevention Plan* in 2007, the State Board of Education also approved changes to the Mississippi School Information System (MSIS) that significantly altered the way in which graduation and dropout rates were calculated.¹⁰ Beginning in accountability year 2007, graduation and dropout rates, which were previously calculated to include repeating students, were calculated without including repeating students. This change rendered the benchmarks obsolete and overstated the progress that Mississippi has made in moving toward the Legislature’s objective of an 85% graduation rate.

Due to the calculation change, the graduation rate increased by 9.7 points from 61.1% to 70.8%. Within two months, MDE was nearly 10 percentage points from meeting the 85% goal stipulated in statute rather than 25 percentage points (approximately). **MDE did not notify the Legislature so they could amend the law to account for this change, nor did MDE amend the benchmarks that were established based on the original four-year graduation rate of 61.1% in the *Statewide Dropout Prevention Plan*. Essentially, MDE met their two-year benchmark within two months by altering the calculation method and gave themselves a roughly ten (10) point head start towards meeting the 85% graduation rate goal.** For comparative analysis of the graduation rate change calculation, see Appendix A.

⁹ MDE’s *Statewide Dropout Prevention Plan*, released February 2007, pg. 8-9.

¹⁰ [MDE Dropout/Graduation Rate Information and Data](#)

MDE recently released the 2020 *Accountability Results*¹¹ for school year 2018-2019, which shows that the agency met the 85% graduation rate goal, which is a commendable accomplishment. However, as previously noted, the goal was set prior to the graduation rate calculation change in 2007 which ultimately rendered the goal and benchmarks obsolete. During review of this report with MDE, the agency acknowledged their culpability in mismanaging the goal and benchmarks.

- **Collaborative Initiative Addressing Dropouts**

MDE claimed that elements of the *Statewide Dropout Prevention Plan* are still in place, including the collaboration of program offices within MDE. In this regard, they maintain that “all offices across the agency play a role” in executing the *Plan*. MDE also referred to the agency’s *Strategic Plan* as evidence of a collaborative effort. Yet there does not appear to be a formal process for holding various departments accountable for their role in dropout prevention. While MDE is taking a decentralized approach, statute calls for the ODP to provide administrative leadership, but the ODP does not exist and the *Plan* is not being utilized, as previously established.

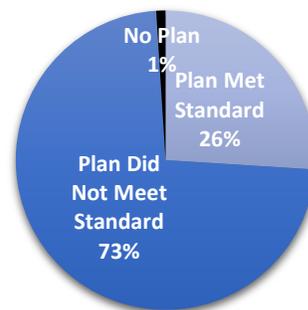
According to statute, the ODP is responsible for collaborating with other program offices within MDE to develop and implement policies and initiatives to reduce the state’s dropout rate. The director of secondary education, who subsumed the ODP director’s duties after 2014 (Exhibit 1, p. 2), could not provide information showing how a collaborative effort is monitored to ensure effectiveness and admitted the agency’s responsibility and negligence in this area.

- **Evaluation of Local School Districts’ Dropout Prevention Plans**

Auditors discovered that MDE has not evaluated local school districts’ dropout prevention plans (LDP) since 2014 as annually required by both statute and the *Statewide Dropout Prevention Plan*. From 2008-2014, each school district was required to annually submit a copy of their board approved LDPs to MDE for re-approval. However, when the ODP was improperly moved under the purview of the OCSA in 2014, school districts were informed that they were no longer required to submit their local plans for re-approval. Instead, school districts were instructed to upload their annual plans to the district website. Auditors found this to be ineffective as there are no measures in place to ensure plans are uploaded and no formal approval process as required by statute.

Consequently, upon review of the district websites, many LDPs were not uploaded while others were often significantly out of date. In order to display the importance of this evaluation process, auditors requested the 2018-2019 LDPs from 140 school districts. Each plan was evaluated using criteria established by MDE to assess its sufficiency.¹² Auditors identified that 73% (102 of 140) of the plans did not meet the standards established by MDE as shown in Exhibit 2.¹³

Exhibit 2
Local Dropout Prevention Plans that Meet MDE Standards (SY, 2018-2019)



■ Plan Met Standard ■ Plan Did Not Meet Standard ■ No Plan

Source: Prepared by auditors using data provided by MDE

¹¹ 2020 *Accountability System District Graduation and Dropout Rates*. Retrieved from <https://www.mdek12.org/OPR/Reporting/Accountability/2020>

¹² MDE submitted documentation outlining the criteria used to approve and annually re-approve each districts local dropout prevention plan. Auditors used these criteria to assess how many recent plans would be approved according to MDE’s stated criteria. For more information, see Appendix B.

¹³ Ibid.

- **Technical Assistance**

MDE no longer provides the level of technical assistance they declared was necessary in the *Statewide Dropout Prevention Plan*. In order to assess the current state of oversight and guidance provided to local school districts by MDE, auditors analyzed data submitted through a survey sent to the 140 school districts. This survey required each school district to list every local dropout prevention program or policy in place in their district. In addition, each district was asked to explain how these programs were monitored, both locally and by MDE. Based on the responses, auditors determined that 49% (480 of 978) of local programs are not being monitored by MDE. Further, the level of oversight and guidance being provided to school districts does not follow a set standard, leaving room for bias and hindering MDE's ability to systematically hold school districts accountable for reducing their dropout rate as required in the *Statewide Dropout Prevention Plan*

To further display the need for technical assistance, auditors mapped the graduation rates for the 2018-2019 school year and categorized school districts based on the following criteria:

Exhibit 3
Graduation Rates per School District
Accountability Year 2020,
School Year (SY) 2018-2019

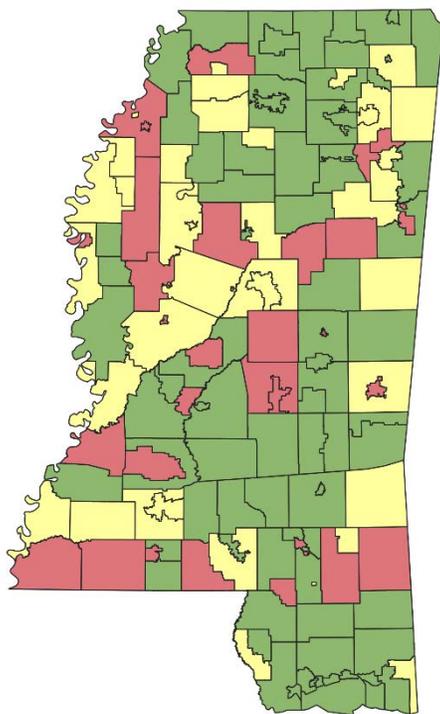


Exhibit 3 shows that 22% (31 of 144) of school districts had graduation rates below 80% for the 2018-2019 school year. Yet formal training has not been offered to school districts with graduation rates below 80% since 2015.

■ <80% Graduation Rates; 31 School Districts; 6,501 Students

- 31 school districts that were less than 80%, a decrease of 10 from 41 districts in school year 2017-2018.

■ 80%-84.9% Graduation Rates; 38 School Districts; 6,747 Students

- 38 school districts that were between 80%-84.9%, no change from 38 districts in school year 2017-2018.

■ ≥85% Graduation Rates; 75 School Districts; 20,271 Students

- 75 school districts that were greater than or equal to 85%, an increase of 10 from 65 districts in school year 2017-2018.

Source: Prepared by auditors using information provided by MDE
<https://www.mdek12.org/sites/default/files/Offices/MDE/OEA/OPR/2019/grad-dropout-rates-2019-report.pdf>

Recommendations

1. MDE should adhere to the law by doing the following:
 - a. re-establish the Office of Dropout Prevention;
 - b. hire a Director for the Office of Dropout Prevention;
 - c. reorganize the Office of Compulsory School Attendance (and appoint a director accordingly) so it is under the purview of the Office of Dropout Prevention;
 - d. review and update the *Statewide Dropout Prevention Plan* and administrative code (Title 7, Part 3, Chapter 30) to accurately reflect the current state of dropout prevention in Mississippi and maintain updates going forward, to include the following:
 - i. updated benchmarks that take into account any dropout and graduation rate calculation changes,
 - ii. clarification regarding school district requirements for the selection of dropout prevention programs,
 - iii. clarification regarding the submission of local school district dropout prevention plans for approval by MDE, and
 - iv. clarification regarding oversight instructions (see Legislative Considerations in next section); and
 - e. annually approve local dropout prevention plans through the development and implementation of an efficient and effective approval process that includes the development of a rating system.
2. MDE should develop policies/procedures that address the following:
 - a. providing general technical assistance on dropout prevention to ensure school districts know who to contact and to establish standards regarding the type of assistance available;
 - b. transferring institutional knowledge during leadership changes to preserve dropout prevention program integrity; and
 - c. monitoring of the collaborative effort between program offices within MDE by the Office of Dropout Prevention to affirm policies and initiatives are reducing the state's dropout rate.
3. MDE should develop a webpage specifically for the Office of Dropout Prevention that includes links to the following:
 - a. *Statewide Dropout Prevention Plan*;
 - b. local school districts' approved dropout prevention plans;
 - c. contact information for technical assistance;
 - d. dropout prevention resources;
 - e. criteria for local dropout prevention plan submission and approval;
 - f. ratings of local dropout prevention plans;
 - g. Office of Compulsory School Attendance;
 - h. list of recommended evidence-based programs;
 - i. updated benchmarks/goals;
 - j. dropout prevention programs being implemented by school districts with accountability measures to ensure programs are implemented as designed; and
 - k. any other policies or procedures developed for dropout prevention.

Note: After receiving the initial draft of this report, MDE developed a landing page for Dropout Prevention within the Office of Secondary Education and listed an Executive Director Office of Secondary Education/Dropout Prevention. MDE essentially linked the Secondary Education staff page to the Dropout Prevention webpage. MDE should continue to update this webpage as they implement the recommendations outlined above. When meeting with MDE, it appeared that the individual assigned to the post of ODP director was done without the statutorily defined process. According to Miss. Code Ann. § 37-13-80, the director of MDE should be appointed by the State Superintendent and meet State Personnel Board qualifications. Statute states, **"The State Superintendent of Public Education shall appoint a director for the Office of Dropout Prevention, who shall meet all qualifications established by the State Superintendent of Public Education and the State Personnel Board. The director shall be responsible for the proper administration of the Office of Dropout Prevention and any other regulations or policies that may be adopted by the State Board of Education."**

Matters for Legislative Consideration

1. Amend Miss. Code Ann. § 37-13-80 (7) to increase the graduation rate goal, benchmark years, and year the objective should be met. The graduation rate goal has nearly been met and the goal and benchmark years have expired as shown in red below:

“It is the intent of the Legislature that, through the statewide dropout prevention program and the dropout prevention programs implemented by each school district, the graduation rate for cohort classes will be increased to not less than **eighty-five percent (85%) by the 2018-2019 school year**. The Office of Dropout Prevention shall establish graduation rate benchmarks for each two-year period from the **2008-2009 school year through the 2018-2019 school year**, which shall serve as guidelines for increasing the graduation rate for cohort classes on a systematic basis to **eighty-five percent (85%) by the 2018-2019 school year**.”
2. Amend Miss. Code Ann. § 37-13-80 to address the possibility that graduation and dropout rate calculation changes will affect goals and benchmarks in the future.

Statutory language example: Should the State Department of Education alter the method of calculating the graduation and dropout rates, with the approval of the State Board of Education, the director of the Office of Dropout Prevention shall immediately update all benchmarks and submit to the Legislature an amendment to Section 37-13-80 that revises the graduation rate goal.
3. Amend Miss. Code Ann. § 37-13-80 to establish an oversight mechanism for the “proper administration of the Office of Dropout Prevention and any other regulations or policies that may be adopted by the State Board of Education,” which, unfortunately, has been proven necessary since the Office has not existed in ten (10) years.

Statutory language example: The Office of Dropout Prevention shall submit to the State Board of Education a quarterly report on the status of the program to include information and data as determined by the State Board of Education.

Oversight of Evidence-Based Programs

Only 29% of dropout prevention programs implemented at school districts are evidence-based

MDE does not provide sufficient oversight of dropout prevention programs to ensure they are implemented as intended to achieve desired outcomes

Criteria

The Mississippi Department of Education states they are dedicated to “evidence-based programs,” and “support school district efforts to invest in proven strategies.”¹⁴ MDE cites the following “expectations and requirements”¹⁵ in support of these positions:

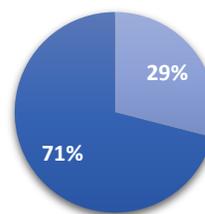
- (1) State law which requires MDE to categorize all programs and activities based on evidence of effectiveness (Miss. Code Ann. § 27-103-159)
- (2) Federal law that requires MDE to select and implement evidence-based programs when using federal funds (Every Student Succeeds Act)
- (3) MDE State Board of Education’s established expectation that MDE is to create a world-class educational system that gives students the knowledge and skills to be successful in college and the workforce, which requires the use of evidence-based practices/programs with a proven track record of success

Condition, Cause, and Effect

During the review, auditors sent a survey to 140 school districts requesting a list of every dropout prevention program or policy being implemented. Districts were required to categorize each program or policy as “evidence-based,” “research-based,” “promising program,” or “other programs,” and provide evidence supporting their categorization.¹⁶ In order to ascertain an accurate tally of programs that districts labeled as “evidence-based” or “research-based,” auditors evaluated each submission individually.

Through this evaluation process, auditors found that 29% (315 of 1074) of the programs submitted were evidence-based. The other 71% were comprised of the following as shown in Exhibit 5: research-based (29%, 307 of 1074); promising program (20%, 213 of 1074)¹⁷; or other programs (22%, 239 of 1074).

Exhibit 4
Dropout Prevention Programs Submitted by School Districts



- evidence-based
- research-based, promising program, or other programs

Source: Prepared by auditors using data provided by school districts

¹⁴ Evidence-Based Programs. (n.d.). Retrieved from <http://www.mdek12.org/OSI/EBP>.

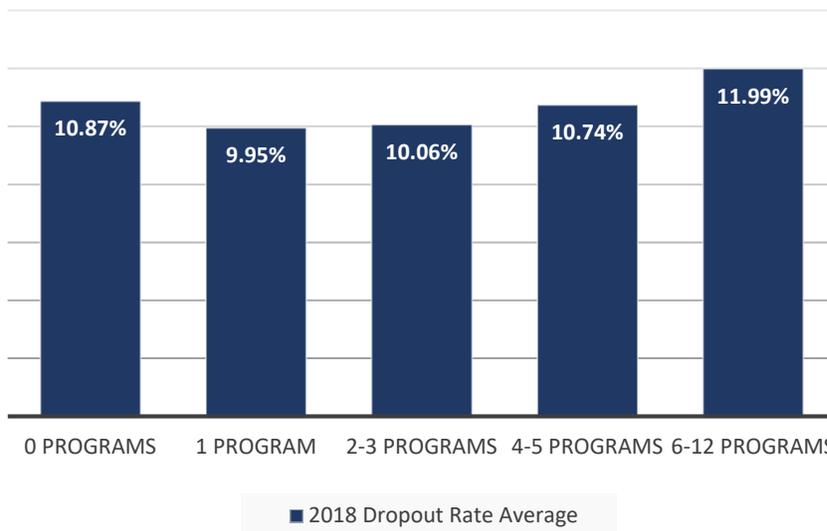
¹⁵ Ibid.

¹⁶ Miss. Code Ann. § 27-103-159 "Evidence-based program" shall mean a program or practice that has had multiple site random controlled trials across heterogeneous populations demonstrating that the program or practice is effective for the population. "Research-based program" shall mean a program or practice that has some research demonstrating effectiveness, but that does not yet meet the standard of evidence-based practices. "Promising program" means an intervention program that has had at least one (1) rigorous controlled evaluation demonstrating effectiveness. "Other programs" means all programs that do not fit the definition of evidence-based, research-based or promising program. This category may include nonintervention programs as well as intervention programs with rigorous evidence of ineffectiveness, mixed evidence of effectiveness, or an absence of evidence.

¹⁷ Note: Those programs categorized as a promising program could not be substantiated by auditors due to time constraints.

Evidence-based programs are not being uniformly implemented at all school districts even though they have been rigorously evaluated and found to produce positive outcomes. Those school districts utilizing evidence-based programs should generally have a lower dropout rate than those utilizing non-evidence based programs. However, auditors found that the average 2018 dropout rate for school districts with or without evidence-based programs was relatively flat, as illustrated in Exhibit 6 below.

Exhibit 5
Evidence-Based Dropout Prevention Programs Implemented by School Districts



Source: Prepared by auditors using data provided by school districts

Perhaps one reason even the evidence-based dropout prevention programs have not been effective is a failure of the local school districts to properly implement the programs. In order for all school districts to reduce their dropout rate, the ODP must create policies and procedures that support effective implementation and monitoring.¹⁸

¹⁸ For more information regarding the school district surveys and assessment of local programs as “evidence-based” or “research-based,” see Appendix A.

Recommendations

1. MDE's Office of Dropout Prevention should amend, with the approval of the State Board of Education, the *Statewide Dropout Prevention Plan* to prioritize implementing evidence-based programs with fidelity.
 2. MDE's Office of Dropout Prevention should utilize the recommendations laid out by the Pew Charitable Trusts *Results First Initiative* in the issue brief titled "Implementation Oversight for Evidence-Based Programs"¹⁹ to create policies, procedures, and guidelines to ensure evidence-based programs are implemented as designed. These guidelines would provide a support structure for delivering oversight, training, and technical assistance to local school districts, for example:
 - a. oversee program implementation and/or partner with a local university to support training, technical assistance, and quality improvement efforts;
 - b. develop appropriate screening and assessment tools to help local school districts select programs that meet the needs of their students;
 - c. develop standards for quality assurance for program oversight, provider development and evaluation, corrective action, and ongoing outcome evaluation; and
 - d. develop fidelity checklists to assess the extent to which providers adhere to key elements of evidence-based practices.
 3. MDE should collect data to measure implementation progress, identify areas for improvement, act on information to improve service delivery, and share the information with policymakers.
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Matters for Legislative Consideration

1. Amend Miss. Code Ann. § 37-13-80 to require MDE to submit an annual report to the Legislature and the State Board of Education that includes data regarding program implementation progress in order to make needed adjustments to policies and administrative practices. "Studies have shown that efforts to scale up and sustain evidence-based programs have been largely successful when these practice-to-policy links are well established, while the opposite is true when these links are weak or nonexistent."²⁰

¹⁹ Pew-MacArthur Results First Initiative. (2016). *Implementation Oversight for Evidence-Based Programs A policymaker's guide to effective program delivery*. Retrieved from https://www.pewtrusts.org/~media/assets/2016/05/rf_programimplementationbrief.pdf

²⁰ Fixsen, D., Blase, K., Metz, A., & Van Dyke, M. (2013). Statewide Implementation of Evidence-Based Programs. *Exceptional Children*, 79(3), 213–230. <https://doi.org/10.1177/001440291307900206>

APPENDIX A

Report Details

Methodology

Local Dropout Prevention Plan approval/re-approval

Assessing the sufficiency of each local dropout prevention plan

On June 25, 2019, 140 superintendents were sent an e-mail requesting a copy of the 2018-2019 local dropout prevention plan for their school district to aid in the assessment of the overall efficiency and effectiveness of the dropout prevention programs implemented in Mississippi's schools. School districts with unique purposes were not asked to submit a copy of their 2018-2019 local dropout prevention plan. In that request, they were asked to submit the most recent plan on file, if the 2018-2019 plan was unavailable. Auditors used the *Framework for District Dropout Prevention Plans* provided by MDE to review the submitted plans. The framework document provides a template that school districts may use to ensure each section of their plan fulfills the requirements for a district dropout plan. Refer to Appendix B to view the framework.

Auditors received 139 plans to review for accuracy. Of the 139 plans submitted, 37 were correct based on the framework, 102 were incorrect.

- 12 Incorrect based on the date range. The law requires plans to be submitted yearly for review and approval.
- 20 Incorrect because the plan is expired.
- 70 Incorrect because the plans were incorrectly drafted or did not contain all of the required information
- 1 Plan was non-existent, Kosciusko School District

School district surveys on dropout prevention

Assessing local dropout prevention programs as evidence-based or research based

On June 25, 2019, a survey was sent to 140 school districts in Mississippi to aid in the assessment of the overall efficiency and effectiveness of the dropout prevention programs implemented in local school districts. Surveys were not sent to school districts with unique purposes. The survey was designed to obtain information regarding the district's dropout prevention programs. Each school district superintendent was asked to provide a list of current dropout prevention initiatives, programs, policies and procedures and to indicate whether they are a promising program, research-based or evidence-based. The districts were also asked to provide support on their claim regarding promising program, research-based or evidence-based. Auditors reviewed the information submitted by the school districts to verify that sufficient evidence was provided to support their claim for programs categorized as evidence- or research-based. The programs were researched through credible sources (i.e. federally supported programs, federally vetted, or organizations recognized as upholding professional standards and therefore releasing reliable research/data). Auditors solely researched claims of research-based and evidence-based programs. For promising programs submitted, auditors were not able to verify the accuracy of the claims due to the volume and project deadline. Programs submitted as "none of these" were not analyzed by auditors.

A total of 1,074 programs were submitted. Of those 1,074 programs submitted, 315 were verified as evidence-based, 307 research-based, and 213 promising programs. Programs that were insufficiently supported as evidence- or research-based were placed in the "other" category along with the programs the district indicated as not meeting the definitions of evidence-based, research-based, or promising program. 239 programs submitted by districts were categorized as "other."

Calculating the graduation rate change

Miss. Code Ann. § 37-13-80 stipulates that the graduation rate, which was 61.1% in 2006,²¹ must be increased to 85% by the 2018-2019 school year (an increase of 23.9 percentage points). To comply with this statute, MDE established benchmarks to systematically increase the four-year graduation rate from 61.1% to 85%.

Beginning in accountability year 2007, graduation and dropout rates, which were previously calculated to include repeating students, were calculated without including repeating students. This change rendered the benchmarks obsolete and overstated the progress that Mississippi has made in moving toward the Legislature’s objective of an 85% graduation rate.

| COMPARISON: GRADUATION RATE BEFORE & AFTER CALCULATION CHANGE | | | | | | | | | |
|---|-------------|------|------|------------|----------|-----------|-------------------|--------------------------|--|
| | | YEAR | | CLASS SIZE | Dropouts | Repeaters | Number GRADUATING | Grad Rate with repeaters | Increase in graduation rate AFTER calculation change |
| | | | | | | | | | |
| ORIGINAL Graduation rate BEFORE calculation change | Benchmark 1 | 2008 | 2009 | 100 | 37 | 10 | 53 | 53.0% |  |
| | Benchmark 2 | 2010 | 2011 | 100 | 34 | 6 | 60 | 60.0% | |
| | Benchmark 3 | 2012 | 2013 | 100 | 29 | 7 | 64 | 64.0% | |
| | Benchmark 4 | 2014 | 2015 | 100 | 23 | 8 | 69 | 69.0% | |
| | Benchmark 5 | 2016 | 2017 | 100 | 19 | 9 | 72 | 72.0% | |
| | Benchmark 6 | 2018 | 2019 | 100 | 15 | 10 | 75 | 75.0% | |
| Graduation rate AFTER calculation change | Benchmark 1 | 2008 | 2009 | 100 | 37 | 0 | 63 | 63.0% | 10.0% |
| | Benchmark 2 | 2010 | 2011 | 100 | 34 | 0 | 66 | 66.0% | 6.0% |
| | Benchmark 3 | 2012 | 2013 | 100 | 29 | 0 | 71 | 71.0% | 7.0% |
| | Benchmark 4 | 2014 | 2015 | 100 | 23 | 0 | 77 | 77.0% | 8.0% |
| | Benchmark 5 | 2016 | 2017 | 100 | 19 | 0 | 81 | 81.0% | 9.0% |
| | Benchmark 6 | 2018 | 2019 | 100 | 15 | 0 | 85 | 85.0% | 10.0% |

Source: Prepared by auditors using the Graduation Rates Guidance document provided by MDE

The table above illustrates how removing the repeating students from the original statute-defined calculation increases the graduation rate.²² Due to the calculation change, the graduation rate increased by 9.7 points from 61.1% to 70.8%. Within two months, MDE was nearly 10 percentage points from meeting the 85% goal stipulated in statute rather than 25 percentage points (approximately).

The original formula used by MDE to calculate rates included: class size; number of dropouts; and number of repeating students. When MDE changed the formula to exclude repeating students, it increased the number of “original graduates,” which increased the graduation rate. The more repeaters removed, the greater the percentage difference in graduation rates.

²¹ MDE’s Statewide Dropout Prevention Plan, released February 2007, pg. 8-9.

²² <https://www.mdek12.org/odsp/documents> MDE Graduation Rates Guidance

APPENDIX B

Criteria used by MDE to approve local dropout prevention plans

Roadmap to Success: A Framework for District Dropout Prevention Plans

Requirement

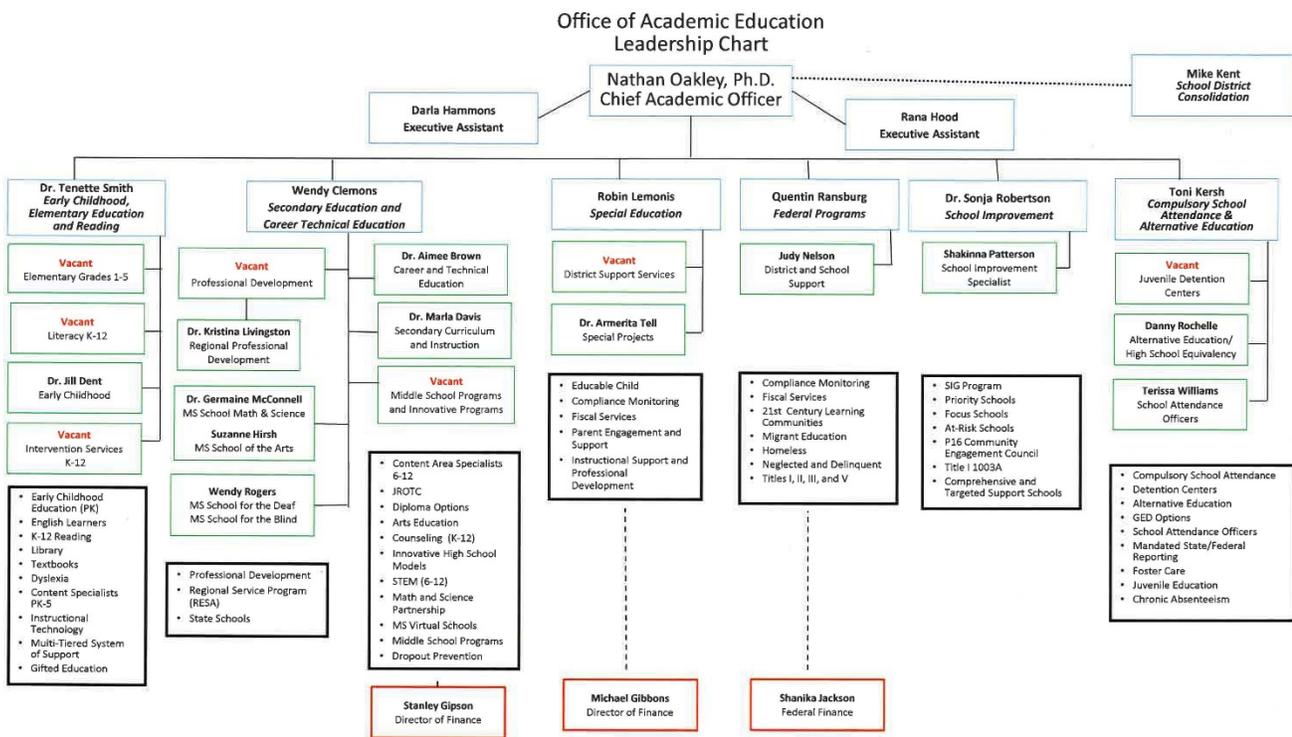
Following the completion of the needs assessment, the district dropout prevention team will detail the implementation of current district-level initiatives related to K-12 dropout prevention, in addition to proposed initiatives. The plan shall include the following components:

1. A District Dropout Prevention Plan cover sheet and Dropout Prevention Team sign-off sheet, containing the following information:
 - The local contact person's name, position, title, address, telephone number, and fax number
 - The district name and a list of the schools (elementary, middle and high) within the district
 - The names and signatures of district dropout prevention team members
2. A Statement of Assurance, containing the following information:
 - The district dropout prevention team leader's name, title, address, telephone number, and fax number
 - The approval signature of the district superintendent and school board chair
3. Outcomes of the needs assessment
 - Identification of students in need of targeted assistance
 - Identification of potential risk factors
 - Needs statements
 - Prioritization of needs
4. Details of current district initiatives
 - Addressing the MDE's Five Strategic Initiatives
 - Addressing the National Dropout Prevention Center's (NDPC) 15 Strategies for Dropout Prevention
 - Highlighting school level impact (elementary, middle, high school)
5. Proposed initiatives with prioritized actions. Both current and proposed initiatives should include:
 - District goals that describe the overall end result the district wishes to achieve to address dropout prevention. (Note: Local districts may require school-level plans based on individual school needs and variations in dropout rates). The goals should be:
 - Derived from the prioritized needs of the school
 - Stated in terms of student outcomes
 - Measurable
 - Specific and clear
 - Ambitious
 - Achievable
 - Long-term (three to five years)
 - Based on established start date and completion dates
 - Benchmarks to serve as implementation checkpoints, to allow a district to assess how well it is progressing towards its goal
 - A description of the persons who will be responsible for the implementation of the goal
 - An evaluation component that provides evidence of the achievement of the objective. The evaluation component should:
 - Be measurable
 - Be directly related to the objective
 - Include evaluation data collected along the way (when possible)
 - Identify the source of evaluation information identified

APPENDIX C

Mississippi Department of Education's Organizational Chart for the Office of Academic Education

When auditors interviewed MDE management about the organizational structure of the Office of Dropout Prevention, MDE supplied auditors with the chart below. It depicts that there is no Office of Dropout Prevention listed, nor is it listed within the Department of Secondary Education which MDE claims.



About the Office of the State Auditor and the Performance Audit Division

The Mississippi Constitution grants specific duties and powers related to prescribing systems of accounting, budgeting, and financial reporting for public offices in Mississippi. It also enumerates other statutory responsibilities including study and analysis of existing public managerial policies and practices; pre-audit and post-audit functions; investigation of suspected fiscal violations; recovering misspent and stolen funds; and a variety of related duties and responsibilities. The mission of the Office of the State Auditor is to serve its customers and protect the public's trust by independently assessing state and local governmental and other entities to ensure that public funds are properly received, are legally, effectively, and efficiently spent and are accounted for and reported accurately.

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This report was produced by the Mississippi Office of the State Auditor in accordance with Mississippi Statute 7-7-211 and is available on the State Auditor's website at www.osa.ms.gov.

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