

Miccosukee Indian School

Consolidated State Application Accountability Workbook

for State Grants under Title IX, Part C, Section 9302 of the Elementary and
Secondary Education Act (Public Law 107-110)

Submitted to:

U.S. Department of the Interior
Bureau of Indian Education
1849 C Street, NW
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U. S. Department of Education
Office of Elementary and Secondary Education
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Instructions for Completing Consolidated State Application Accountability Workbook

By January 31, 2003, States must complete and submit to the Department this Consolidated State Application Accountability Workbook. We understand that some of the critical elements for the key principles may still be under consideration and may not yet be final State policy by the January 31 due date. States that do not have final approval for some of these elements or that have not finalized a decision on these elements by January 31 should, when completing the Workbook, indicate the status of each element which is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

Transmittal Instructions

To expedite the receipt of this Consolidated State Application Accountability Workbook, please send your submission via the Internet as a .doc file, pdf file, rtf or .txt file or provide the URL for the site where your submission is posted on the Internet. Send electronic submissions to conapp@ed.gov.

A State that submits only a paper submission should mail the submission by express courier to:

Celia Sims
U.S. Department of Education
400 Maryland Ave., SW
Room 3W300
Washington, D.C. 20202-6400
(202) 401-0113

PART I: Summary of Required Elements for State Accountability Systems

Instructions

The following chart is an overview of States' implementation of the critical elements required for approval of their State accountability systems. States must provide detailed implementation information for each of these elements in Part II of this Consolidated State Application Accountability Workbook.

For each of the elements listed in the following chart, States should indicate the current implementation status in their State using the following legend:

- F:** State has a final policy, approved by all the required entities in the State (e.g., State Board of Education, State Legislature), for implementing this element in its accountability system.
- P:** State has a proposed policy for implementing this element in its accountability system, but must still receive approval by required entities in the State (e.g., State Board of Education, State Legislature).
- W:** State is still working on formulating a policy to implement this element in its accountability system.

Summary of Implementation Status for Required Elements of State Accountability Systems

Principle 1: All Schools		
F	1.1	Accountability system includes <i>all schools and districts in the state</i> .
F	1.2	Accountability system holds <i>all schools to the same criteria</i> .
F	1.3	Accountability system incorporates the <i>academic achievement standards</i> .
F	1.4	Accountability system provides <i>information in a timely manner</i> .
F	1.5	Accountability system includes <i>report cards</i> .
P	1.6	Accountability system includes <i>rewards and sanctions</i> .
Principle 2: All Students		
F	2.1	The accountability system includes <i>all students</i>
P	2.2	The accountability system has a consistent definition of <i>full academic year</i> .
F	2.3	The accountability system properly includes <i>mobile students</i> .
Principle 3: Method of AYP Determinations		
P	3.1	Accountability system expects <i>all student subgroups, public schools, and LEAs to reach proficiency by 2013-14</i> .
P	3.2	Accountability system has a method for determining whether <i>student subgroups, public schools, and LEAs made adequate yearly progress</i> .
P	3.2a	Accountability system establishes a <i>starting point</i> .
P	3.2b	Accountability system establishes <i>statewide annual measurable objectives</i> .
P	3.2c	Accountability system establishes <i>intermediate goals</i> .
Principle 4: Annual Decisions		
F	4.1	The accountability system <i>determines annually the progress</i> of schools and districts.

STATUS Legend:

F – Final state policy

P – Proposed policy, awaiting State approval

W – Working to formulate policy

Principle 5: Subgroup Accountability

F	5.1	The accountability system <i>includes all the required student subgroups</i> .
F	5.2	The accountability system holds <i>schools and LEAs accountable for the progress of student subgroups</i> .
P	5.3	The accountability system includes <i>students with disabilities</i> .
P	5.4	The accountability system includes <i>limited English proficient students</i> .
P	5.5	The State has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.
F	5.6	The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

Principle 6: Based on Academic Assessments

F	6.1	Accountability system is based <i>primarily on academic assessments</i> .
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Principle 7: Additional Indicators

P	7.1	Accountability system includes <i>graduation rate for high schools</i> .
P	7.2	Accountability system includes an <i>additional academic indicator for elementary and middle schools</i> .
P	7.3	Additional indicators are valid and reliable.

Principle 8: Separate Decisions for Reading/Language Arts and Mathematics

F	8.1	Accountability system holds students, schools and districts separately accountable for <i>reading/language arts and mathematics</i> .
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Principle 9: System Validity and Reliability

F	9.1	Accountability system produces <i>reliable decisions</i> .
F	9.2	Accountability system produces <i>valid decisions</i> .
F	9.3	State has a plan for addressing <i>changes in assessment and student population</i> .

Principle 10: Participation Rate

F	10.1	Accountability system has a means for calculating the <i>rate of participation</i> in the statewide assessment.
F	10.2	Accountability system has a means for <i>applying the 95% assessment criteria to student subgroups and small schools</i> .

STATUS Legend:

- F – Final policy
- P – Proposed Policy, awaiting State approval
- W– Working to formulate policy

PART II: State Response and Activities for Meeting State Accountability System Requirements

Instructions

In Part II of this Workbook, States are to provide detailed information for each of the critical elements required for State accountability systems. States should answer the questions asked about each of the critical elements in the State's accountability system. States that do not have final approval for any of these elements or that have not finalized a decision on these elements by January 31, 2003, should, when completing this section of the Workbook, indicate the status of each element that is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002–2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

Overview of Miccosukee Indian School Proposal for an Alternative Definition of Adequate Yearly Progress (AYP)

Introduction

The Miccosukee Indian Tribe has been a federally recognized tribe since 1962, and asserts its status as a sovereign entity in having a government-to-government relationship with the federal government of the United States. The Miccosukee Indian Tribe is the governing body for the Miccosukee Indian School (MIS). MIS is a tribally-controlled school under the Indian Self-Determination and Education Assistance Act, and a part of the tribe's self-determination rights where the federal Indian trust responsibility is concerned.

In the implementation of the educational program on the Miccosukee Reservation, MIS receives funding from the U.S. Department of the Interior through the Indian Student Equalization Program (ISEP) as well as from funds from the U.S. Department of Education (ESEA/NCLB and IDEA). The result of receiving these funds is that MIS is subject to the requirements of statutes and regulations governing the provision of funds. The Bureau of Indian Education (BIE) serves as the State Education Agency (SEA) for BIE-funded schools. The role of the BIE is to facilitate the funding of MIS and to provide compliance monitoring and oversight of the expenditure of funds. The BIE also provides technical assistance to MIS where specific applications of statutes and regulations are concerned.

One such area where technical assistance has been provided concerns the implementation of education accountability under the Elementary and Secondary Education Act (ESEA), currently authorized as the No Child Left Behind Act (NCLB). Each state and the BIE are required to have an approved Consolidated State Application Accountability Workbook (i.e., state accountability plan) or, in the case of States implementing ESEA flexibility, an Accountability Addendum. States follow the accountability plan that they have proposed and which has been approved by the U.S. Department of Education. Where Alternative Definition of Adequate Yearly Progress is concerned, the BIE provides technical assistance to MIS in the creation of an accountability workbook similar to what states produce.

The No Child Left Behind Act mandated a negotiated rulemaking process to establish how the BIE would implement its accountability system. Negotiated rulemaking is formal consultation between the federal government (the U.S. Department of the Interior) and Indian tribes to codify regulations by which statutes concerning tribes are implemented by the federal government. Where NCLB is concerned, the principle determination of negotiated rulemaking was that BIE-funded schools would be measured against the accountability standards of the respective 23 states where BIE schools are located. In other words, the BIE and its schools would utilize the academic content standards, assessments, and definitions of Adequate Yearly Progress (AYP) based on accountability systems of the 23 states in which BIE schools are located. The Secretary of the Interior's Definition of AYP is codified as 25 CFR § 30.104(a).

Beginning in 2012, the U.S. Department of the Education began to grant flexibility to states requesting waivers of specific NCLB requirements in exchange for rigorous and

comprehensive education reforms. State-developed plans designed to improve educational outcomes for all students, close achievement gaps, increase equity, and improve the quality of instruction were approved in flexibility systems by the U.S. Department of Education. Though the BIE formulated a Flexibility Request, it will not be possible to implement it until the U.S. Department of the Interior amends 25 CFR § 30.104(a) such that a single accountability system can be implemented bureau-wide.

However, for tribes, another option is available. Under ESEA (§ 1116(g)(1)(B)) and 25 CFR § 30.104(b) and §§ 30.105-108, tribally-controlled schools may apply for an Alternative Definition of Adequate Yearly Progress (Alternative AYP) to replace the Secretary's Definition. By 2010, MIS began seeking such an Alternative AYP.

The goal of MIS submitting an Alternative AYP proposal is to allow the Miccosukee tribal community to fully integrate its culture into the school's educational program. For example,

- Miccosukee language and culture standards
- Views on Compulsory Education and the Tribe's approach to education
- Characteristics of the School's Enrollment (number and broad descriptors of students)
- Pedagogical considerations in the education of Miccosukee students

The Alternative AYP proposal offered here represents the aspirations of the Miccosukee Indian Tribe to implement an educational program suited to the needs of its students and its community.

Phased Approach to Alternative AYP

MIS proposes a phased approach to the Alternative AYP system, whereby a basic definition of AYP will be proposed for immediate implementation and additional, more complex elements will be added in subsequent revisions. The use of a phased approach is designed to facilitate an immediate transition away from the required state standards and assessments and to allow time to develop and validate and gain approval of more complex AYP systems. The most important features of the Alternative AYP system that can be implemented quickly in a simplified AYP model reflect the tribe's values regarding education:

- Adoption by MIS of the Common Core State Standards (CCSS) and the Next Generation Science Standards (NGSS). The MIS-adopted CCSS and NGSS emphasize methods of instruction and curricula integration that address the needs of Miccosukee students.
- Use of the Smarter-Balanced Assessments aligned to CCSS.
- Use of Dynamic Learning Maps as the Alternate Assessment.
- Use of a Science Assessment in place of the Attendance Indicator. The Iowa Test of Basic Skills assessment will be used to assess Science until an assessment developed for the NGSS is available.
- Revise annual measurable objectives

Components of the three-phase approach are listed below.

Phase 1 (Simplified)

- Minor Changes to an AYP style accountability system used by most states under NCLB.
- Curricula that meet Common Core State Standards in Mathematics and Reading/Language Arts.
- Smarter Balanced Assessment Consortium (SBAC) Assessments in Mathematics and Reading/Language Arts, and that are aligned to CCSS and alternate assessments for students with the most significant cognitive disabilities developed by Dynamic Learning Maps (DLM).
- Use of Science as the K-8 Other Academic Indicator (OAI) and as measured by the Iowa Test of Basic Skills (ITBS) and alternate assessments for students with the most significant cognitive disabilities developed by Dynamic Learning Maps (DLM). ITBS is aligned to the science curriculum in use at MIS. An assessment developed for the NGSS will be used when it becomes available.
- Use of the Adjusted Cohort Graduation Rate (ACGR) for 4-year on-time graduates.
- Establishing revised Annual Measurable Objectives for each AYP performance indicator.

Phase 1 includes a simplified model that substitutes the Science Assessment result for the attendance rate in grades 3-8. This change will remedy accountability penalties due to low and irregular attendance created by the non-compulsory education policy of MIS. The change will benefit the school by shifting accountability to more relevant measures that are culturally sensitive.

Under the Phase 1 simplified model, the Miccosukee Indian School joins in the national reform movement through its own developed Miccosukee based School Improvement Model. Below are shown the indicators used under the simplified Alternative AYP proposal. For this listing, the Year 1 AMOs are listed for the proficiency indicators and for the graduation rate target.

Phase 2 (More complex)

- Implementation of AYP Components Requiring U.S. Department of Education Peer Review and support by data analysis.
 - Measures of within-year student academic growth (growth model).
 - Use of an Accountability Index to balance multiple measures of student academic performance to include growth to standards as well as objective measures of proficiency against standards.

Phase 3 (Most complex)

- Miccosukee Language Standards and Oral Language Assessments
- Portfolio assessments (introduction of a qualitative dimension to accountability).

Indicators under MIS Simplified Alternative AYP Proposal

Indicator	All Students				Limited English Proficient				Special Education			
	N	AMO	SH	AYP	N	AMO	SH	AYP	N	AMO	SH	AYP
Mathematics Participation Rate	-	95%	-	Met/ Missed	-	95%	-	Met/ Missed	-	95%	-	Met/ Missed
Reading/Language Arts Participation Rate	-	95%	-	Met/ Missed	-	95%	-	Met/ Missed	-	95%	-	Met/ Missed
Mathematics Proficiency Rate	15	61.5%	10%	Met/ Missed	15	61.5%	10%	Met/ Missed	15	61.5%	10%	Met/ Missed
Reading/Language Arts Proficiency Rate	15	74.7%	10%	Met/ Missed	15	74.7%	10%	Met/ Missed	15	74.7%	10%	Met/ Missed
K-8 OAI: Science Proficiency Rate*	15	69.0%	10%	Met/ Missed	15	69.0%	10%	Met/ Missed	15	69.0%	10%	Met/ Missed
HS OAI: Graduation Rate	15	80%	2%	Met/ Missed	15	80%	2%	Met/ Missed	15	80%	2%	Met/ Missed

N = Minimum Number; AMO = Annual Measurable Objective; SH = Safe Harbor

*In the interest of simplicity, the 95% testing threshold must be met or the Science Proficiency indicator will be automatically missed. This qualification eliminates the need for a separate participation rate indicator for science.

Phased approach timeline. The phased approach timeline calls for immediate submission of the Phase 1 Alternative AYP proposal approval and planned implementation in school year 2014-2015. Phase 2 can be submitted once baseline data is accumulated for development of a growth model, which is estimated at two years. Phase 3 depends upon the pace of development of standards and oral language assessments for the Miccosukee language. Because this Alternative AYP proposal is primarily concerned with approval of Phase 1, Phases 2 and 3 are included as an appendix.

Standards and Assessments

At the heart of the Alternative AYP model is the adoption of Common Core State Standards (CCSS) by MIS, which will form the academic standards for the proposed MIS accountability system. The educational standards implemented by MIS will help teachers ensure students have the skills and knowledge needed to be successful, while also helping parents understand what is expected of their children.

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MIS will implement standards and assessments as they become available, as outlined below. In addition, MIS will introduce a growth model and accountability Index in later years.

Proposed Accountability System Timeline: Standards, Assessments, Growth Model, and Index

Component	SY 13-14	SY 14-15	SY 15-16	SY 16-17	SY 17-18	SY 18-19	
Common Core State Standards - Math & Reading	x	x	x	x	x	x	
ITBS Assessments- Math & Reading	x						
SBAC Assessments - Math & Reading		x	x	x	x	x	
Dynamic Learning Maps™ (DLM®) Alternate Assessment – Math & Reading		x	x	x	x	x	
ITBS-Aligned Science Standards	x	x					
ITBS – Science Assessment	x	x					
Dynamic Learning Maps™ (DLM®) Alternate Assessment – Science (pilot available April 2015)		x	x	x	x	x	
Next Generation Science Standards			x	x	x	x	
Next Generation Science Assessment			x	x	x	x	
English Language Development (ELD) Standards			x	x	x	x	
ACCESS for ELLs (Assessing Comprehension and Communication in English State-to-State for English Language Learners)			x	x	x	x	
Growth Model - Math & Reading		o	o	x	x	x	
Growth Model - Science			o	x	x	x	
Accountability Index			o	x	x	x	
	x	Full Model					
	o	Data collection for model analysis					

MIS will use general assessments aligned to Common Core standards for accountability purposes. For mathematics and reading/language arts, MIS will use the Smarter Balanced Assessment Consortium (SBAC) assessments. The cut scores will be implemented by the assessment vendor and used by MIS. Science is also required. The assessment for Next Generation Science Standards is not yet developed, so MIS will be using the Iowa Test of Basic Skills (ITBS) in science until such time as the new assessment is available. The Miccosukee Tribe will maintain control of Personally Identifiable Information (PII) related to the scores from these assessments to ensure the privacy of its students.

MIS will obtain, as needed, Dynamic Learning Maps Alternate Assessment (DLM-AA) for Students with the most significant cognitive disabilities in Mathematics Reading/Language Arts, and Science for the purpose of appropriately assessing students with the most significant cognitive disabilities. Because the number of students taking these assessments will be small (typically three students), it is cost effective and efficient to procure these assessments aligned to Common Core State Standards.

Lastly, MIS will use the World-Class Instructional Design and Assessment (WIDA) of English language proficiency for the purpose of identifying students as Limited English

Proficient (LEP). This is required under 25 CFR § 39.134. Lastly, MIS will use the ACCESS for ELLs (Assessing Comprehension and Communication in English State-to-State for English Language Learners) English language assessment in the 2015-2016 school year.

Performance Levels

The above assessments will identify student proficiency by the required federal levels:

- Basic (Below Basic)
- Basic (Approaching Proficiency)
- Proficient
- Advanced
- The basic category will be divided into “below basic” and “approaching proficiency,” similar to the assessments used in AYP systems in the states under NCLB.

Point System

For the purpose of calculating AYP, students will be assigned a point value based on their level of attainment on the assessment:

- Below Basic – 0 points
- Approaching Proficiency – 0.5 points
- Proficient – 1 point
- Advanced – 1.5 points

The purpose of assigning ½ point for the approaching proficiency category is to reward the school for educating students that may have been substantially below proficiency at the beginning of the year. Though an imperfect proxy, rewarding partial credit for students that near proficiency is a way of acknowledging that the student likely grew at a pace that was acceptable. As a proxy for growth, awarding points for the nearing proficiency category is a way to grasp student growth in academic achievement before the implementation of a true, within-year growth model becomes operational in the accountability system.

To determine whether the school met the AMO for each proficiency indicator, the sum of scores for all Full Academic Year students will be divided by the total of all Full Academic Year students enrolled during the testing window, as determined by the testing vendor. This will provide the proportion of students attaining satisfactory levels of proficiency on these academic assessments. To ensure appropriate identification of the school’s level of attainment for each proficiency indicator, a 95% confidence interval will be applied to the proportion before it is compared with the AMO. If the proportion of students combined with the confidence interval is equal to or higher than the AMO, the school will be judged to have “met” the indicator.

Annual Measurable Objectives (AMO)

Currently, No Child Left Behind (NCLB) requires 100% of students to be proficient by 2014. In accordance with section 9401 of ESEA, MIS requests that the U.S. Department of Education waive the requirement that all AMOs be 100% by 2014 for MIS. Specifically, on behalf of MIS, BIE requests a waiver of the requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable

objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State's proficient level of academic achievement on the State's assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. In accordance with the principles of Alternative Definition of AYP, MIS will also ask the Secretary of the Interior will waive 25 CFR § 30.107(b)(8).

MIS requests this waiver from the U.S. Department of Education to reset AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for all MIS students and student subgroups. In their place, MIS will adopt the methodology offered by the U.S. Department of Education to states under ESEA Flexibility for computing a new beginning point, intermediate points, and terminal point for AMOs.

As such, MIS will use a model offered by the U.S. Department of Education to states under ESEA Flexibility to generate new AMOs for MIS under Alternate AYP. The concept involves a 50% reduction in non-proficient scoring over a six year period. Revised AMOs using the 2012-2013 data as a baseline will be created for Reading/Language Arts and Mathematics. New AMOs have been established for the Science academic content area, also based on the 2012-2013 test results.

MIS will establish new AMOs for MIS in mathematics and reading/language arts based on Northwest Education Association MAPS data from 2012-13 as the baseline. The new formula will seek to reduce 50% of the proficiency gap between MIS' student performance in each of these categories in the top quintile in mathematics and reading/language arts, respectively, across a six year time frame. The intermediate AMOs will be 1/6 of 50% of the gap, and the AMOs will increase each year.

The AMO for graduation rate will be 80%, which is a beneficial change from the typical 85% graduation rate. However, if the school significantly increases its graduation rate when compared with the prior year but fails to hit the AMO, the school will be judged to have "met" the graduation rate indicator. Significant is defined to mean an increase of at least 2% over the prior year.

Conclusion

Miccosukee Indian School has worked on the development of an Alternative Definition of AYP in recent years. In essence, new ground is being broken by MIS in seeking an alternative accountability system better matched to the needs of the MIS community. The work has been challenging, but well worth the effort.

Miccosukee Indian School has decided to utilize a phased approach to approval and adoption of alternative accountability systems, beginning with a simplified model and progressing to a more complex model over time. This approach potentially will yield immediate results and incorporate greater improvements in the accountability system in the long term.

PRINCIPLE 1. A single statewide Accountability System applied to all public schools and LEAs.

CRITICAL ELEMENT
1.1 How does the State Accountability System include every public school and LEA in the State?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>The school system affected by the Miccosukee accountability system consists of one school: Miccosukee Indian School. In accordance with ESEA and the Memorandum of Agreement between the U.S. Department of the Interior (BIE) and the U.S. Department of Education (12/3/2012), BIE-funded schools are also designated Local Education Agencies (LEA).</p> <p>The Miccosukee Indian Tribe administers the Miccosukee Indian School (MIS) through its right to self-determination. Funding for the school is provided by the Bureau of Indian Education, and originates from the U.S. Department of the Interior (DOI) through the Indian Student Equalization Program (ISEP), and from the U.S. Department of Education (ED) under the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA).</p> <p>Submission of this proposal for an Alternative Definition of AYP (Alternative AYP) is allowed under ESEA (§ 1116(g)(1)(B)) and 25 CFR §§ 30.104(b), 30.105-108, and justified by the Miccosukee’s desire for its own academic content standards and assessments, separate from those of the state in which the school is located.</p> <p>The Alternative AYP proposed in this workbook and placed before ED for review will apply to the Miccosukee Indian School – the one and only school controlled by the Miccosukee Indian Tribe.</p>

CRITICAL ELEMENT
1.2 How are all public schools and LEAs held to the same criteria when making an AYP determination?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
As there is only one school comprising the MIS school system and this Alternative AYP will be used for the issuance of accountability determinations on a yearly basis for MIS. All public schools and LEAs therefore will be held to the same criteria when making AYP determinations.

CRITICAL ELEMENT
1.3 Does the State have, at a minimum, a definition of <i>basic</i> , <i>proficient</i> and <i>advanced</i> student achievement levels in reading/language arts and mathematics?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>The accountability system will use the Smarter-Balanced Assessment Consortium (SBAC) assessments for the subjects of Mathematics and Reading/Language Arts, which are aligned with the Common Core State Standards.</p> <p>The SBAC assessments satisfy the minimum requirements of the critical elements in that it produces Achievement Level Descriptors consistent with the federal reporting categories of <i>below basic (basic low)</i>, <i>basic (basic high)</i>, <i>proficient</i>, and <i>advanced</i>.</p>

CRITICAL ELEMENT
1.4 How does the State provide accountability and adequate yearly progress decisions and information in a timely manner?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>The assessments used for accountability by MIS will be administered in the Spring. During the school year, key student demographic data will be tracked by the BIE's Native American Student Information System (NASIS). Upon completion of the academic year for which AYP is to be determined, MIS will work with the BIE to ensure transmission of all data elements required for the timely processing and issuance of an AYP determination. The AYP determination will be issued no later than August 1 and MIS will take appropriate steps to ensure the community it serves is notified of the AYP determination and the meaning of the elements involved in its calculation.</p> <ul style="list-style-type: none"> • Throughout the School Year: Entry of Student Enrollment Data into NASIS • Spring: Administration of Summative Assessments for Accountability • July 1: Review of all data necessary for Report Cards and AYP • July 15: Submission of data to the BIE for accountability • August 1: BIE calculates AYP and issues a letter of determination to MIS • August 31: MIS may submit appeals of the AYP determination to BIE • September 15: BIE post Report Cards to BIE web site for Public Reporting

CRITICAL ELEMENT
1.5 Does the State Accountability System produce an annual State Report Card?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>Yes, the State Accountability System produces an annual State Report Card. The BIE currently develops and posts annual State Report Cards and School Report Cards on its web site (www.BIE.edu). This includes AYP determinations as well as all indicators involved in the calculation of AYP for BIE schools.</p> <p>The Report Card will report MIS performance on Alternative AYP Indicators for all statistically significant student sub-groups pursuant to ESEA, IDEA, and FERPA guidelines:</p> <ul style="list-style-type: none"> • Participation Rate (Mathematics and Reading/Language Arts) • Proficiency Rates (Mathematics and Reading/Language Arts) • K-8 Other Academic Indicator: Science Proficiency • HS Other Academic Indicator: Adjusted Cohort Graduation Rate (ACGR)

CRITICAL ELEMENT
<p>1.6 How does the State Accountability System include rewards and sanctions for public schools and LEAs?</p>
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS has established a State Accountability System that includes rewards and sanctions for the single school in the system.</p> <p>MIS engages in best practices as described in the NativeStar (IndiStar) indicators (see Attachment B). MIS uses NativeStar to track school improvement activities. MIS will use NativeStar to identify required practices corresponding with the existing BIE school improvement statuses:</p> <ul style="list-style-type: none"> • Adequate Yearly Progress and Alert Status • School Improvement (Year 1 and Year 2) Status • Corrective Action (Year 1 and Year 2) Status • Restructuring <p>The rewards and sanctions proposed by MIS are ones that are currently-in place and being used by the school in response to differentiated recognition stemming from accountability determinations. When a school receives an AYP determination, it identifies weaknesses and strengths and engages in school improvement activities according to the AYP status and the needs of the school.</p> <p>Further, MIS uses peer observations and reflections to improve teacher effectiveness in the classroom. Classroom observation is matched with student performance on academic assessments (short cycles and diagnostic tests as well as summative assessments). Based on performance over repeated observations, educators may be identified to receive awards or sanctions. Awards may include recognition by the school, cash awards, or other non-monetary incentives.</p> <p>Sanctions are also in-place, and may include informal and formal items. If identified for assistance, educators may receive informal coaching, modeling of better instructional approaches, identification for additional training, the opportunity to observe and team teach, or be required to participate in specific school improvement activities. More formal sanctions may also be used – these may range from verbal and written documentation to contract non-renewal and dismissal.</p>

PRINCIPLE 2. All students are included in the State Accountability System.

CRITICAL ELEMENT
2.1 How does the State Accountability System include all students in the State?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>All students enrolled at the Miccosukee Indian School are members of the Miccosukee Indian Tribe. All students will participate in the Alternative AYP system.</p> <p>By the Memorandum of Agreement between the U.S. Department of the Interior (BIE) and the U.S. Department of Education, the BIE will provide accountability determinations for the All Students, Limited English Proficient, and Students with Disabilities sub-groups, provided they meet the minimum number of observations required to produce a statistically reliable determination on each AYP indicator.</p>

CRITICAL ELEMENT
2.2 How does the State define “full academic year” for identifying students in AYP decisions?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS has defined a “full academic year” for determining which students are to be included in decisions about AYP beginning Fall 2013.</p> <p>The definition of full academic year is all students whose enrollment is continuous and uninterrupted from August 24st in the current school year through the testing administration period for the particular content area being tested. Students who generate ESEA, IDEA, and ISEP (i.e., Interior) funding are considered enrolled at the school. Students who meet this FAY criterion will generate observations for use in the AYP calculation.</p> <p>The Participation Rate indicators, however, will be measured against all students enrolled at any point during the testing window.</p>

CRITICAL ELEMENT
2.3 How does the State Accountability System determine which students have attended the same public school and/or LEA for a full academic year?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
MIS uses the NASIS system for tracking student enrollments. NASIS will be the system of record for the purpose of determining FAY and eligibility for consideration in the AYP determination.

PRINCIPLE 3. State definition of AYP is based on expectations for growth in student achievement that is continuous and substantial, such that all students are proficient in reading/language arts and mathematics no later than 2013-2014.

CRITICAL ELEMENT
<p>3.1 How does the State’s definition of adequate yearly progress require all students to be proficient in reading/language arts and mathematics by the 2013-2014 academic year?</p>
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS’ accountability workbook will use the AMO methodology approved by the U.S. Department of Education for the purpose of making determinations of AYP.</p> <p>MIS and the BIE will calculate AYP based on a 50% reduction in students scoring non-proficient over a six year period. Revised AMOs using the 2012-2013 assessment data (i.e., Northwest Education Association MAPS) as a baseline were created for Reading/Language Arts and Mathematics. New AMOs were established for the Science academic content area, also based on the 2012-2013 test results.</p>

MIS Alternative AYP AMOs Trajectory

Annual Measurable Objectives (With Half Points Awarded)							
Academic Content Area	Baseline SY 12-13	Year 1 SY 13-14	Year 2 SY 14-15	Year 3 SY 15-16	Year 4 SY 16-17	Year 5 SY 17-18	Year 6 SY 18-19
Mathematics	61.5%	64.7%	67.9%	71.1%	74.3%	77.5%	80.7%
Reading/Language Arts	74.7%	76.8%	78.9%	81.0%	83.1%	85.3%	87.4%
Science	69.0%	71.6%	74.2%	76.8%	79.4%	81.9%	84.5%

The creation of a new baseline for Annual Measurable Objectives (AMOs) is consistent with the model approved by the U.S. Department of Education for States to use under ESEA Flexibility. The BIE will use SY 2012-2013 assessment data as the baseline for implementation of Alternate AYP starting with SY 2013-2014. The increments for Mathematics, Reading and Science are 3.2%, 2.1%, and 2.6, respectively. AMOs will be revised after baseline data is gathered from the new consortia assessments.

The same AMOs will be applied to all sub-groups.

CRITICAL ELEMENT
3.2 How does the State Accountability System determine whether each student subgroup, public school, and LEA makes AYP?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>Only one school will participate in Alternative AYP under this proposal. MIS will be held accountable at the school level and for the inclusion of all of its students in the Alternative AYP system. This includes all students regardless of sub-group status.</p> <p>NASIS will be the system of record for determining students' sub-group membership, and each student's eligibility. Sub-group status will be verified by the BIE based upon information provided by MIS in NASIS.</p>

CRITICAL ELEMENT
3.2a What is the State's starting point for calculating Adequate Yearly Progress?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS will use a model approved by the U.S. Department of Education for States to use under ESEA Flexibility.</p>

CRITICAL ELEMENT
3.2b What are the State's annual measurable objectives for determining adequate yearly progress?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
MIS will use a model approved by the U.S. Department of Education for States to use under ESEA Flexibility.

CRITICAL ELEMENT
3.2c What are the State's intermediate goals for determining adequate yearly progress?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
MIS will use a model approved by the U.S. Department of Education for States to use under ESEA Flexibility.

PRINCIPLE 4. State makes annual decisions about the achievement of all public schools and LEAs.

CRITICAL ELEMENT
4.1 How does the State Accountability System make an annual determination of whether each public school and LEA in the State made AYP?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>AYP decisions for MIS will be made in the traditional method utilized under No Child Left Behind: To be judged as making Adequate Yearly Progress, MIS will have to meet all performance indicators for all sub-groups attaining the minimum number of observations for statistical reliability and meeting the Annual Measurable Objective for each indicator.</p> <p>Alternatively, if a subgroup of students in a school falls short of the AYP target, the school can still meet AYP if (a) the percentage of students who score below the proficient level is decreased by 10% from the year before, and (b) there is improvement for that subgroup on other indicators.</p> <p>For proficiency indicators, a 95% confidence interval will be applied consistent with its usage in state accountability systems. A 95% confidence interval decreases the likelihood of errors in identifying indicator performance.</p> <p>Set AMOs for participation rate and graduation rate will be defined and used for accountability purposes. For these indicators, a confidence interval is not appropriate or necessary.</p>

PRINCIPLE 5. All public schools and LEAs are held accountable for the achievement of individual subgroups.

CRITICAL ELEMENT
5.1 How does the definition of adequate yearly progress include all the required student subgroups?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
MIS will identify student enrollments and sub-group eligibility using NASIS. Verification of these enrollment records will be performed by the BIE in conjunction with the data reported by MIS for accountability purposes.

CRITICAL ELEMENT
5.2 How are public schools and LEAs held accountable for the progress of student subgroups in the determination of adequate yearly progress?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>All sub-groups will be expected to perform in terms of academic achievement as measured against the same AMOs as the All Students group. Failure of sub-groups to meet indicator performance will be identified as such in the issuance of the AYP determination.</p> <p>When sub-group indicator performance is unsatisfactory, MIS will engage in NativeStar school improvement activities that will address the improvement of performance by students included in the appropriate sub-group.</p>

CRITICAL ELEMENT
5.3 How are students with disabilities included in the State’s definition of adequate yearly progress?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>All students with disabilities will be appropriately assessed, according to their individual needs. As necessary, MIS will procure additional DLM assessments to address the needs of students with the most significantly cognitive disabilities where assessment by alternate standards is concerned. The mainline assessments provided by SBAC for Mathematics and Reading/Language Arts will include a wide range of accommodations appropriate for students requiring them for their Individualized Education Program (IEP) or for their 504 accessibility needs.</p> <p>For all students requiring assessment with accommodations or against alternate academic achievement standards, each student will be identified as requiring such accommodation or alternate assessment in their Individualized Education Program or 504 plan in NASIS. MIS will record the students’ needs in NASIS and, upon request, present this information to the BIE to verify that students were appropriately assessed.</p> <p>The appropriate assessment for use with Students with Disabilities or requiring 504 accommodations will be counted toward MIS’ participation rate indicators. For sub-groups attaining the minimum number of students for inclusion in the accountability determination, a determination will be issued for the qualifying proficiency indicator.</p>

CRITICAL ELEMENT
5.4 How are students with limited English proficiency included in the State's definition of adequate yearly progress?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>All LEP students enrolled during the testing window at MIS will be assessed for accountability purposes. Students will be considered formerly LEP starting the year after they exit active participation in the LEP program and extending to the end of the next subsequent year (LEP, LEP Monitoring Year 1, and LEP Monitoring Year 2).</p> <p>Identification of LEP status by MIS will be reflected in NASIS and verified by the BIE in the students' enrollment records.</p>

CRITICAL ELEMENT
<p>5.5 What is the State's definition of the minimum number of students in a subgroup required for reporting purposes? For accountability purposes?</p>
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS will establish 15 as the minimum number (minimum n) of students required to ensure statistical reliability for proficiency and behavioral indicators. Fifteen students that qualify as Full Academic Year are required to perform indicator evaluations for proficiency and graduation rate (cohort) purposes.</p> <p>For participation rate, as all students are expected to test that are enrolled during the testing window, there is no minimum number required to perform the calculation. It is extremely unlikely that fewer than 15 students will be enrolled during the testing window.</p> <p>The average number of test scores reported for the last five years at MIS is 85. During the same period of time, the identification of Limited English Proficient students has not been consistent. With SY 2015-16, MIS will use the World-class Instructional Design and Assessment (WIDA) to determine students' level of English proficiency. This information will be captured and reported with their enrollment data in NASIS.</p> <p>For the same five year period of time, the average number of students testing that were also receiving Special Education services is 13, with the minimum number identified being 9 and the maximum being 21. Proficiency (as a ratio of the SWD population) is highly variable due to the low number of students in the sub-group. It is appropriate to impose 15 as a minimum number to avoid issues related to widely varying test results across years that both produce artificially low scores as well as ones that are artificially high.</p>

CRITICAL ELEMENT
5.6 How does the State Accountability System protect the privacy of students when reporting results and when determining AYP?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>The BIE reports an Annual Report Card on behalf of all of its schools. For FERPA compliance, cell sizes less than 10 students are suppressed for public reporting.</p> <p>For AYP reporting, indicator performance is listed as “N/A” both internally and for purposes of public reporting when an insufficient number of students would jeopardize privacy.</p>

PRINCIPLE 6. State definition of AYP is based primarily on the State’s academic assessments.

CRITICAL ELEMENT
6.1 How is the State’s definition of adequate yearly progress based primarily on academic assessments?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS’ Alternative AYP proposal evaluates indicator performance on Mathematics, Reading/Language Arts, and Science for AYP determinations. The Science assessment is used as the Other Academic Indicator (OAI) in place of Attendance in elementary grades.</p> <p>Between Participation in assessments and Proficiency on assessments as an indicator, three different assessments are used as the basis for making AYP determinations. The remaining indicator, Graduation Rate, is required for use as the OAI in high school by the U.S. Department of Education. Academic assessments are the primary basis for determinations of AYP under the Miccosukee Alternative AYP proposal.</p>

PRINCIPLE 7. State definition of AYP includes graduation rates for public High schools and an additional indicator selected by the State for public Middle and public Elementary schools (such as attendance rates).

CRITICAL ELEMENT
7.1 What is the State definition for the public high school graduation rate?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS will use the 4-year Adjusted Cohort Graduation Rate as the basis of making AYP determinations. This is the rate required for accountability and reporting purposes by the U.S. Department of Education.</p> <p>MIS defines a graduate as a student receiving a regular high school diploma. For the ACGR calculation, the diploma must be awarded no later than the end of the summer of their fourth year in high school. That is, all first time ninth graders are expected to have graduated by four years later.</p> <p>Students are identified into the appropriate cohort (“Class of”) using the NASIS system, based on when they first entered the ninth grade. Students that transfer into MIS will be placed in cohort based on when they first entered the ninth grade, regardless of which school they attended. Students who transfer out or die prior to the cohort’s graduation date are removed from the cohort pool.</p> <p>The cohort pool, therefore, is comprised of students that graduate, students who do not graduate but are continuing in school, and students that have dropped-out. The cohort pool is divided into the number of cohort graduates to determine the ACGR for accountability and reporting purposes.</p> <p>Certificates of participation or attendance, GEDs, or Special Education programs terminating short of a regular diploma are not counted as graduates.</p> <p>Students that graduate early or with an endorsed diploma (one that also satisfies the state’s requirements to merit their endorsement) are also counted as graduates with their cohort pool.</p> <p>The AMO for graduation rate will be 80%. However, if the school significantly increases its graduation rate when compared with the prior year but fails to hit the AMO, the school will be judged to have “met” the graduation rate indicator. Significant is defined to mean an increase of at least 2% over the prior year.</p>

CRITICAL ELEMENT
7.2 What is the State’s additional academic indicator for public elementary schools for the definition of AYP? For public middle schools for the definition of AYP?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS will use the academic content area of Science for its Other Academic Indicator for K-8 AYP determinations. MIS has consistently used the Iowa Test of Basic Skills (ITBS). MIS has implemented an academic curriculum and testing system for science that is aligned. The assessment itself is an appropriate instrument to determine students’ achievement levels relative to the academic content standards.</p> <p>AMOs are included in 3.1 and have been generated using the methodology approved by the U.S. Department of Education.</p> <p>As Common Core State Standards, Next Generation Science Standards, and assessments become available, MIS will switch to these standards and assessments for accountability purpose as soon as practicable.</p>

CRITICAL ELEMENT
7.3 Are the State’s academic indicators valid and reliable?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS has reformulated its Alternative AYP proposal to reflect options for accountability that have been approved for use in other states by the U.S. Department of Education. The use of assessments and graduation rates, constrained by the minimum number of observations required to make a valid and reliable inference of achievement relative to AMOs, is a valid and reliable way to make AYP determinations.</p>

PRINCIPLE 8. AYP is based on reading/language arts and mathematics achievement objectives.

CRITICAL ELEMENT
8.1 Does the state measure achievement in reading/language arts and mathematics separately for determining AYP?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS will use the Common Core State Standards in Mathematics and Reading/Language Arts separately for calculation of students' level of achievement relative to the academic content standards. Performance against these standards will be measured by the Smarter-Balanced Assessment Consortium's assessments for each respective subject area.</p> <p>The K-8 OAI, as previously mentioned, will be an assessment of student achievement in Science as determined by the ITBS. As Common Core State Standards, Next Generation Science Standards, and assessments are developed by the Smarter-Balanced consortium and other standards and assessment consortia, MIS will adopt the new standards and migrate to the new assessments. Approval of this accountability workbook outlining the parameters of the Alternative AYP system will be assumed as the U.S. Department of Education's allowance of such an assessment migration by MIS as the new standards and assessments become available.</p>

PRINCIPLE 9. State Accountability System is statistically valid and reliable.

CRITICAL ELEMENT
9.1 How do AYP determinations meet the State’s standard for acceptable reliability?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>The standard for acceptable reliability is met by the incorporation of multiple measures of student performance, the inclusion of a 95% confidence interval where proficiency levels are evaluated, and the imposition of a minimum n of 15 to mitigate the chances of erroneously identifying MIS where AYP determinations are concerned.</p> <p>Moreover, it cannot be overstated that the Miccosukee Indian Tribe values its self-determination and that by adopting standards that move the school away from the state in which Miccosukee is located, the entirety of the accountability determination becomes more representative of the values of the tribe. That is, Miccosukee rejects the use of state standards, assessments, and accountability systems, because they do not acknowledge or include Miccosukee’s values where the education of the community is concerned.</p>

CRITICAL ELEMENT
9.2 What is the State's process for making valid AYP determinations?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>Consistent with BIE practices, AYP for MIS will be calculated by BIE. BIE will provide technical assistance to MIS to ensure that all data required to make valid and reliable AYP determinations is collected and appropriately used for that purpose. The BIE, having schools in 23 states and using these states’ accountability systems, has routinized the process of making AYP determinations. The process the BIE utilizes will systematically review the data submitted by MIS, clear up all questions related to the data, and use a double-check process to ensure that the proper AYP determination is issued to the school.</p>

CRITICAL ELEMENT
9.3 How has the State planned for incorporating into its definition of AYP anticipated changes in assessments?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
<p>MIS will use the Smarter-Balanced Assessment Consortium tests, which are aligned to CCSS, DLM for the Alternate Assessment, and an assessment developed for the Next Generation Science Standards, as they become available. If adjustments are required for the AMOs, MIS and the BIE will work together to ensure that the AMO progression accommodates information provided by SBAC to its members concerned with the assessment.</p>

PRINCIPLE 10. In order for a public school or LEA to make AYP, the State ensures that it assessed at least 95% of the students enrolled in each subgroup.

CRITICAL ELEMENT
10.1 What is the State's method for calculating participation rates in the State assessments for use in AYP determinations?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
All students enrolled in MIS during the testing window should be appropriately assessed. These will be in grades 3-8 and one grade in high school, as determined by the assessment vendor as appropriate for the assessment that is administered. The AMOs for participation rate is 95%.

CRITICAL ELEMENT
10.2 What is the State's policy for determining when the 95% assessed requirement should be applied?
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS
All students enrolled during the testing window at MIS in grades 3-8 and one grade in high school should be appropriately assessed. The requirement is 95%. This requirement applies to all students in the appropriate grades and to all student sub-groups.