



Massachusetts Department of Elementary and Secondary Education

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Jeff Wulfson
Acting Commissioner

MEMORANDUM

To: Members of the Board of Elementary and Secondary Education
From: Jeff Wulfson, Acting Commissioner

A handwritten signature in cursive script that reads "Jeff Wulfson".

Date: March 16, 2018
Subject: Commonwealth of Massachusetts Virtual Schools – Report on Probation and Recommendation on Conditions for Greenfield Commonwealth Virtual School

At its February 23, 2016 meeting, in accordance with G.L. c. 71, § 94, and 603 CMR 52.00, the Board of Elementary and Secondary Education (Board) renewed the certificate of the Greenfield Commonwealth Virtual School (GCVS) for a three-year period from July 1, 2016, through June 30, 2019, with a maximum enrollment of 750 students. Further, pursuant to 603 CMR 52.12(2), the Board extended the school's probationary status and directed it to meet specified terms of probation, as recommended by former Commissioner Chester in his memorandum to the Board dated February 12, 2016.

This memorandum summarizes findings from an accountability review of GCVS conducted by the Department of Elementary and Secondary Education (Department) on December 14, 2017, including the school's status in complying with the conditions placed on its certificate. I am recommending that the Board extend probation and impose a new set of conditions on the school's certificate for the remainder of the certificate term, through June 30, 2019. The rationale for my recommendation follows.

School Profile

| Greenfield Commonwealth Virtual School | | | |
|--|--|--|---|
| Year opened: | As an Innovation School: September 2010 As a CMVS: July 1, 2013 | Year(s) renewed: | July 1, 2016 through June 30, 2019 |
| Educational management organization: | None | Location of administrative offices: | 278 Main Street Suite 205 Greenfield, MA 01301 |
| Maximum enrollment: | 750 | Current enrollment: | 612 as of March 1, 2018 |
| Grade span: | K-12 | Number of sending districts served: | 139 as of March 1, 2018 |
| Number of instructional days per year: | 181 | Students waitlisted: | 0 as of March 1, 2018 |
| Mission Statement: The Greenfield Commonwealth Virtual School, a public school of choice, serves students from across Massachusetts who need a learning community that is accessible and flexible. We give our students and their families choices in what, how, when, and where they learn. As a pioneer of online personalized learning, we empower our educators to tailor learning experiences to each student's strengths, interests, and challenges. We redefine and change how students and teachers engage through innovative technology, while ensuring mastery of competencies embedded in a rigorous curriculum. | | | |

Background

The Greenfield Commonwealth Virtual School (GCVS), formerly known as Massachusetts Virtual Academy of Greenfield (MAVA), opened in 2010 as an innovation school under G.L. c. 71, § 92. On June 25, 2013, the Board granted a three-year certificate to operate the re-named Massachusetts Virtual Academy at Greenfield Commonwealth Virtual School (GCVS) to a board of trustees (GCVS Board) formed to assume governance of MAVA from the Greenfield Public Schools. Educational courses and teaching services, including management software, learning materials, and technical support services were provided by K12, Inc. (K12), a virtual school provider based in Herndon, Virginia.

On June 5, 2014, the Department conducted an accountability review of GCVS in accordance with the regulations on Commonwealth virtual schools, 603 CMR 52.08. The report documented concerns about the school's faithfulness to its certificate, the quality of the academic program, the quality and amount of supports for diverse learners, and compliance with regulatory requirements and the Department's guidance. Due to these concerns, on October 20, 2014, pursuant to the virtual school regulations at 603 CMR 52.12(2) and based on the recommendation of the Commissioner, the Board placed GCVS on probation.

The Department conducted a second review of GCVS on March 2, 2015. The report indicated that GCVS had made progress toward meeting the terms of its probation and noted that the GCVS Board and school leadership took affirmative steps to improve instruction and professional learning. The review, however, identified a dependency on teacher-developed

materials to ensure curriculum alignment, the lack of a formal curriculum for English learner (EL) students, the lack of a formal inclusion model for students with disabilities, variation in the execution of the school's expectations for teaching higher order thinking skills, and uneven instruction. In a June 29, 2015 response to the review, GCVS described the additional steps it planned to take to address these concerns, including researching EL curricula for the fall of 2015 and how, in the estimation of school leadership, online interventions presented a clear picture of the performance of students who were experiencing academic difficulties.

The school's certificate expired at the end of the 2015-16 school year. Pursuant to 603 CMR 52.11, and in accordance with the Department's guidelines, GCVS applied to renew its certificate on June 28, 2015. The Department conducted a renewal inspection in November 2015; the report from this inspection was issued to the school on December 14, 2015. As previously noted, at its meeting on February 23, 2016, the Board renewed the certificate of GCVS for an additional three-year period from July 1, 2016, through June 30, 2019, with a maximum enrollment of 750 students. Further, pursuant to 603 CMR 52.12(2), the Board extended the school's probationary status and directed it to meet specified terms of probation, as recommended by former Commissioner Chester in his memorandum to the Board dated February 12, 2016.

Amendment Request

Since it opened as MAVA in 2010, the school's educational courses and teaching services, including management software, learning materials, and technical support services, were provided by K12. At its May 22, 2017 meeting, the GCVS board of trustees voted to formally terminate the school's contract with K12, effective June 30, 2017. The reasons given for the change were concerns about the affordability of K12's products and services and the opportunity for GCVS to provide more flexible learning options for students through new software and curriculum. In addition, the cost savings would enable the school to hire more teachers.

The Greenfield Commonwealth Virtual School submitted a formal request to amend its certificate on June 8, 2017. The proposal included key changes to the school's education program and operations, as follows.

- A new learning management system (Canvas by Instructure, Inc.) that enables teachers, parents/guardians, and students to access the curriculum from any computer, tablet, or mobile device.
- EngageNY as the core curriculum for grades K-5 English Language Arts (ELA) and mathematics. The school's social studies and science curriculum will be curated from EngageNY, National Geographic, PBS, and other sources.
- Florida Virtual School Global (FLVS) as the core curriculum for all subjects in grades 6-12.
- The hiring of approximately 10 additional staff members, including classroom teachers, special educators, and visual arts, music, health/wellness, and world language teachers.
- Technical support for students, parents/guardians, and staff will be provided by an in-house technology support team.

I approved these amendments on October 19, 2017.

Per Pupil Tuition

The virtual schools statute requires the Board to give preference to proposals for operating virtual schools that address students with unique needs. G.L. c. 71, § 94(c).¹ At its November 28, 2017 meeting, the Board had a discussion and heard proposals from GCVS and the state's other virtual school, TEC Connections Academy Commonwealth Virtual School (TECCA), regarding funding. Both schools indicated that their current tuition rates are not adequate to serve the needs of the students they enroll.

On December 19, 2017, the Board voted to amend the certificates of the two virtual schools to specify \$8,190 in per pupil tuition, effective for FY19, and authorized the Department to adjust this rate annually for inflation.² The principal rationale underlying the Board's approval was that more resources would enable the virtual schools to provide higher teacher salaries, would decrease student load, would increase teacher contact time with students and parents/guardians, and would help keep pace with the rising costs of operation.

Accountability Review

On December 14, 2017, the Department conducted an accountability review of GCVS in accordance with 603 CMR 52.08. The review team issued ratings in the areas of academic program success, organizational viability, and faithfulness to certificate, the guiding principles of virtual school accountability. With respect to the first area, faithfulness to certificate, the team's overall finding of "Partially Meets" reflected that GCVS is in the midst of implementing changes to its program design as result of the termination of the school's contract with K12. The second area, academic and program success, received ratings of "Partially Meets," apart from the diverse learners criterion that received a rating of "Falls Far Below" and cited the school's need to develop programming for its small population of English learners. With respect to organizational viability, the team issued "Partially Meets" ratings for school leadership, professional climate, and governance.

Recommendation for Extending Probation

Although GCVS has made changes to its educational programming and contractual relationships, the results of the recent accountability review prompt me to recommend that the Board extend probation, continuing conditions 1, 2, 3, and 4 as established by the Board at its meeting on

¹ G.L. c.71, §94(c), states that the Board

shall give preference to proposals that include an educational program or specialized focus that appropriately addresses 1 or more of the following: students with physical or other challenges that make it difficult for them to physically attend a school; students with medical needs requiring a home or hospital setting; students with unusual needs requiring a flexible schedule; students who are over-age for their grade; students who have been expelled; students who have dropped out; students at risk of dropping out; students who are pregnant or have a child; students with social and emotional challenges that make it difficult for them to physically attend a school; students who feel bullied or cannot attend school because the students' safety is at risk; gifted and talented students; students who seek academic work not available in their school; students in rural communities; and students in institutionalized settings. The board shall also consider whether proposed schools will create or enhance the opportunity for students to attend virtual schools in all grades from kindergarten through grade 12.

² \$8,265 less \$75 per pupil retained by the Department for program administration.

February 23, 2016. With respect to condition 4, GCVS administered the Next-Generation MCAS tests in 2017, so it was not assigned an accountability and assistance level by the Department. Consequently, it did not receive a rating for the student performance criterion in the most recent accountability review. Therefore, I recommend that condition 4, related to demonstrating significant and sustained academic improvement in mathematics, English language arts, and science, be extended to December 31, 2018.³ I also recommend that the Board impose a new condition, condition 5, specifically tied to the findings of the accountability review concerning programs and services for English learners and intended to accelerate the school's implementation of its new program, particularly given the additional resources GCVS will receive through the increase in per pupil tuition beginning in FY2019.

The proposed probationary conditions are:

1. Reporting Requirements

- a. Greenfield Commonwealth Virtual School must continue to submit to the Department, at odl@doe.mass.edu or 75 Pleasant St., Malden, MA, 02148, board meeting agendas and materials prior to each board meeting at the same time that these items are sent to the school's board members. Further, the school must submit to the Department the minutes of these proceedings as soon as the school's board approves them. The Department reserves the right to require the submission of additional information, such as quarterly or monthly financial statements, if board materials do not already include this information. The school must provide such additional information within two business days.
 - b. Greenfield Commonwealth Virtual School must continue to submit to the Department weekly student enrollment reports.
2. Greenfield Commonwealth Virtual School must continue to maintain an escrow account in an amount determined by the Department in consultation with the school to pay for any potential closing, legal, and audit expenses associated with closure, should that occur.
 3. Greenfield Commonwealth Virtual School must continue to enroll a maximum of 750 students.
 4. By December 31, 2018, Greenfield Commonwealth Virtual School must demonstrate significant and sustained academic improvement in mathematics, English language arts, and science. Should the school fail to do so, the Commissioner and the Board of Elementary and Secondary Education will consider nonrenewal or revoking the school's certificate at the end of the term on June 30, 2019.
 5. By April 30, 2018, Greenfield Commonwealth Virtual School must submit to the Department for its approval, at sedmond@doe.mass.edu or 75 Pleasant St., Malden, MA, 02148, in a format prescribed by the Office of Language Acquisition and Academic Achievement, a detailed plan for serving students who are English learners. The plan, which must be implemented upon approval, must provide descriptions and timelines for:

³ For detailed data on GCVS, including 2017 MCAS results, refer to Attachment A.

- a. Identifying and screening all students potentially eligible for English learner services;
- b. Providing high-quality, specialized instructional support to English learners, including standards-aligned curriculum, formative assessments, and pedagogical strategies;
- c. Providing all teachers of English learners with ongoing professional development to effectively meet the needs of English learners and their parents/guardians;
- d. Providing on-demand translation services to current and prospective students' parents/guardians who do not speak English; and
- e. Conducting outreach to prospective students' parents/guardians who do not speak English, in multiple languages, using the same channels the school uses for English-speaking parents, which may include web/social media, radio, print, and television.

Like all public schools in Massachusetts, Commonwealth virtual schools must demonstrate that they are a viable and effective option for students and families. Based on the results of 2018 MCAS tests and the findings of a renewal inspection visit of GCVS planned for the fall of 2018, we intend to revisit whether GCVS can uphold this expectation. We will recommend further action as appropriate.

If you have any questions regarding this matter or require additional information, please contact Kenneth Klau, Director, Office of Digital Learning (781-338-3505); Cliff Chuang, Senior Associate Commissioner (781-338-3222); or me.

Attachments:

- A: Data on GCVS
- B: Status of Current Probationary Conditions Motion

Attachment A: Data on GCVS

| 4-Year Graduation Rate (2016) | | | | | | |
|--------------------------------------|-------------|-------------------|-----------------------|---------------|---------------|------------------------|
| # in Cohort | % Graduated | % Still in School | % Non-Grad Completers | % H.S. Equiv. | % Dropped Out | % Permanently Excluded |
| 45 | 40.0 | 24.4 | 0.0 | 6.7 | 28.9 | 0.0 |

| Mobility Rates (2016) | | | | |
|------------------------------|---------|----------|------------------|-------------|
| Churn/Intake Enroll | % Churn | % Intake | Stability Enroll | % Stability |
| 755 | 41.3 | 29.8 | 646 | 68.6 |

Mobility represents students transferring into or out of public schools, districts or the state: the Intake Rate measures the number of students that enroll in the state, a district, or school after the beginning of the school year; the Churn Rate measures the number students transferring into or out of a public school or district throughout the course of a school year; and the Stability Rate measures how many students remain in a district or school throughout the school year.

| Attendance Rates (2017) | | | | | |
|--------------------------------|-----------------------|------------------|------------------------------------|------------------------------|----------------|
| Attendance Rate | Avg. # of Days Absent | Absent 10 + Days | Chronically Absent ($\geq 10\%$) | Unexcused Absences (> 9) | Retention Rate |
| 86.2 | 19.4 | 49.2 | 44.4 | 49.2 | 1.3 |

Next Generation MCAS Tests of Spring 2017 - Percent of Students at Each Achievement Level for GCVS

| | Meeting or Exceeding Expectations | | Exceeding Expectations | | Meeting Expectations | | Partially Meeting Expectations | | Not Meeting Expectations | | Included | Avg. Scaled Score | SGP | Included in SGP |
|--------------------------|-----------------------------------|-------|------------------------|-------|----------------------|-------|--------------------------------|-------|--------------------------|-------|----------|-------------------|------|-----------------|
| | GCVS | State | GCVS | State | GCVS | State | GCVS | State | GCVS | State | | | | |
| Grade 3 - Reading | 33 | 47 | 6 | 8 | 27 | 39 | 47 | 42 | 20 | 10 | 51 | 488.9 | N/A | N/A |
| Grade 3 - Math | 22 | 49 | 2 | 7 | 20 | 42 | 53 | 38 | 24 | 13 | 49 | 482.9 | N/A | N/A |
| Grade 4 - ELA | 17 | 48 | 0 | 7 | 17 | 41 | 63 | 42 | 20 | 10 | 46 | 485.9 | 31 | 32 |
| Grade 4 - Math | 15 | 49 | 0 | 6 | 15 | 43 | 37 | 39 | 48 | 13 | 46 | 475.2 | 40 | 33 |
| Grade 5 - ELA | 23 | 49 | 3 | 6 | 21 | 43 | 51 | 42 | 26 | 10 | 39 | 486.1 | 45 | 33 |
| Grade 5 - Math | 23 | 46 | 0 | 7 | 23 | 39 | 46 | 44 | 31 | 10 | 39 | 485.6 | 28 | 33 |
| Grade 6 - ELA | 24 | 51 | 2 | 7 | 22 | 43 | 64 | 39 | 13 | 10 | 55 | 488.1 | 33 | 39 |
| Grade 6 - Math | 13 | 50 | 2 | 7 | 11 | 42 | 57 | 39 | 30 | 11 | 53 | 482.1 | 28 | 38 |
| Grade 7 - ELA | 32 | 50 | 0 | 6 | 32 | 44 | 48 | 39 | 20 | 11 | 65 | 488.3 | 27 | 44 |
| Grade 7 - Math | 22 | 47 | 0 | 9 | 22 | 38 | 45 | 42 | 34 | 12 | 65 | 482.1 | 33 | 44 |
| Grade 8 - ELA | 40 | 49 | 2 | 8 | 38 | 41 | 46 | 39 | 14 | 11 | 63 | 493.6 | 56.5 | 46 |
| Grade 8 - Math | 22 | 48 | 0 | 9 | 22 | 39 | 56 | 42 | 22 | 11 | 63 | 487.3 | 32 | 44 |
| Grades 3-8 - ELA | 29 | 49 | 2 | 7 | 27 | 42 | 53 | 41 | 18 | 10 | 319 | 488.8 | 37 | 194 |
| Grades 3-8 - Math | 20 | 48 | 1 | 8 | 19 | 40 | 49 | 41 | 31 | 12 | 315 | 482.7 | 31.5 | 192 |

MCAS Tests of Spring 2017 - Percent of Students at Each Achievement Level for GCVS

| | Proficient or Higher | | Advanced | | Proficient | | Needs Improvement | | Warning/ Failing | | Included | CPI | SGP | Included in SGP |
|---|----------------------|-------|----------|-------|------------|-------|-------------------|-------|---------------------|-------|----------|------|-----|-----------------|
| | GCVS | State | GCVS | State | GCVS | State | GCVS | State | GCVS | State | | | | |
| Grade 5 - STE | 26 | 46 | 10 | 17 | 15 | 29 | 49 | 39 | 26 | 15 | 39 | 62.8 | N/A | N/A |
| Grade 8 - STE | 21 | 40 | 0 | 3 | 21 | 37 | 52 | 40 | 27 | 20 | 63 | 60.7 | N/A | N/A |
| Grade 10 - ELA | 89 | 91 | 30 | 47 | 59 | 44 | 11 | 6 | 0 | 3 | 46 | 96.2 | 35 | 30 |
| Grade 10 - Math | 66 | 79 | 36 | 53 | 30 | 26 | 20 | 14 | 14 | 8 | 44 | 81.8 | 34 | 26 |
| Grade 10 - STE | 68 | 74 | 26 | 32 | 42 | 42 | 26 | 21 | 5 | 5 | 19 | 86.8 | N/A | N/A |
| NOTE: Grade 10 STE results are reported based on students' best performance on any STE test taken in grade 9 or grade 10; only students continuously enrolled in the state, district, or school from fall of grade 9 through spring of grade 10 are included in state and school results. | | | | | | | | | | | | | | |

Attachment B: Status of Current Probationary Conditions

1. Reporting Requirements:

- a. GCVS must continue to submit to the Department, at odl@doe.mass.edu or 75 Pleasant St., Malden, MA, 02148, Board meeting agendas and materials prior to each Board meeting at the same time that these items are sent to GCVS Board members. Further, GCVS must submit to the Department the minutes of these proceedings as soon as the GCVS Board approves them. The Department reserves the right to require the submission of additional information, such as quarterly or monthly financial statements, if Board materials do not already include this information. GCVS must provide such additional information within two business days.

Status: GCVS is providing board meeting agendas and materials and meeting minutes to the Department. The GCVS board has made improvements to the fall 2017 minutes, providing more specificity and explanation of discussion and decisions made.

- b. Effective immediately, GCVS must submit to the Department weekly student enrollment reports that indicate the number of students enrolled on a full- or part-time basis, including the number of students residing in Greenfield.

Status: GCVS provides enrollment reports to the Department upon request.

- c. By May 1 of each year, GCVS must submit to the Department a budget for the following fiscal year that demonstrates how the school will provide a high-quality education program while adhering to the requirement that not less than 5 percent of the students enrolled in GCVS are residents of Greenfield as required by G.L. c. 71, § 94(c).

Status: Chapter 133 of the Acts of 2016, § 49, eliminated the requirement that not less than five percent of the students enrolled in a CMVS reside in the school district(s) that established the school. The Board of Elementary and Secondary Education voted to cap the school's enrollment at 750 students so that it can focus efforts on providing a high-quality education program.

2. By March 1, 2016, GCVS must submit to the Department a corrective action plan for ensuring that not less than 95 percent of all student groups participate in state assessments.

Status: GCVS complied with this condition.

3. By March 31, 2016, the school must establish an escrow account in an amount determined by the Department in consultation with the school to pay for any potential closing, legal, and audit expenses associated with closure, should that occur.

Status: GCVS complied with this condition.

4. Effective beginning in the 2016-17 school year, the enrollment of GCVS shall be limited to a maximum of 750 students.

Status: GCVS complied with this condition.

5. By December 31, 2017, GCVS must demonstrate significant and sustained academic improvement in mathematics, English language arts, and science. Should the school fail to do so, the Commissioner and the Board of Elementary and Secondary Education will consider revoking the school's charter effective June 30, 2018, and not wait until the end of the certificate term on June 30, 2019.

Status: Pending. Because GCVS administered the 2017 Next Generation MCAS tests, it was not assigned an accountability and assistance level by the Department and did not receive a rating for the student performance criterion.

Board of Elementary and Secondary Education Meeting: March 27, 2018
Agenda Item: Commonwealth of Massachusetts Virtual Schools –
Probation and Conditions for Greenfield Commonwealth Virtual School

MOVED: that the Board of Elementary and Secondary Education, in accordance with General Laws chapter 71, section 94, and 603 CMR 52.11, hereby extends probation for the Greenfield Commonwealth Virtual School (GCVS) and directs the school to meet the following conditions on the school's certificate, as recommended by the Commissioner:

1. Reporting Requirements
 - a. GCVS must continue to submit to the Department, at odl@doe.mass.edu, board meeting agendas and materials prior to each board meeting at the same time that these items are sent to the school's board members. Further, the school must submit to the Department the minutes of these proceedings as soon as the school's board approves them. The Department reserves the right to require the submission of additional information, such as quarterly or monthly financial statements, if board materials do not already include this information. The school must provide such additional information within two business days.
 - b. GCVS must continue to submit to the Department weekly student enrollment reports.
2. GCVS must continue to maintain an escrow account in an amount determined by the Department in consultation with the school to pay for any potential closing, legal, and audit expenses associated with closure, should that occur.
3. GCVS must continue to enroll a maximum of 750 students.
4. By December 31, 2018, GCVS must demonstrate significant and sustained academic improvement in mathematics, English language arts, and science. Should the school fail to do so, the Commissioner and the Board of Elementary and Secondary Education will consider nonrenewal or revoking the school's certificate at the end of the term on June 30, 2019.
5. By April 30, 2018, GCVS must submit to the Department for its approval, at sedmond@doe.mass.edu or 75 Pleasant St., Malden, MA, 02148, in a format prescribed by the Office of Language Acquisition and Academic Achievement, a detailed plan for serving students who are English learners. The plan, which must be implemented upon approval, must provide descriptions and timelines for:
 - a. Identifying and screening all students potentially eligible for English learner services;

- b. Providing high-quality, specialized instructional support to English learners, including standards-aligned curriculum, formative assessments, and pedagogical strategies;
- c. Providing all teachers of English learners with ongoing professional development to effectively meet the needs of English learners and their parents/guardians;
- d. Providing on-demand translation services to current and prospective students' parents/guardians who do not speak English; and
- e. Conducting outreach to prospective students' parents/guardians who do not speak English, in multiple languages, using the same channels the school uses for English-speaking parents, which may include web/social media, radio, print, and television.

In addition to meeting the terms of probation, GCVS must also comply with the terms of its certificate. The Commissioner shall review and report to the Board on the success or lack of success of GCVS in meeting the terms of probation and its certificate and, based upon his review, shall recommend such further action as he deems appropriate.

The Commonwealth of Massachusetts virtual school shall be operated in accordance with the provisions of General Laws chapter 71, section 94; 603 CMR 52.00; and all other applicable state and federal laws and regulations and such conditions as the Commissioner or the Board of Elementary and Secondary Education may from time to time establish, all of which shall be deemed conditions of the certificate.