

Summary of Public Comments on Proposed Amendments to Competency Determination Regulations (603 CMR 30.00: Regulations on MCAS and the Competency Determination)

Source: Correspondence received through email, April 22 to June 3, 2022

The Department received 229 emails from individuals, organizations, and districts responding to the proposed changes to the competency determination (CD) requirements. 225 of these emails were opposed to the proposed changes, and 4 emails were in support.

List of organizations and individuals submitting public comment:

Organizations, School Committees, and School Districts	Individuals
<ul style="list-style-type: none"> • American Federation of Teachers Massachusetts (AFT-MA) • Education Reform Now Advocacy • Massachusetts Association of Speakers of Other Languages (MATSOL) • Massachusetts Business Alliance for Education (MBAE) • Massachusetts High Technology Council (MHTC) • Massachusetts Teachers Association (MTA) • Multistate Association for Bilingual Education – Northeast • Boston Public Schools • Dedham School Committee • Norton School Committee and Public School District 	<ul style="list-style-type: none"> • 219 emails from 236 individuals <ul style="list-style-type: none"> ○ 36 of these individuals identified themselves as educators. ○ 27 identified themselves as parents. ○ An additional 15 identified as both parents and educators. ○ 12 identified themselves as students. ○ 145 individuals did not state their role in the community.

Summary of Public Comment	
Comments	Department's Response
<p>Form email – Opposed</p> <p>DESE received 118 emails from commenters who responded using a form email containing the same language. The form email provided the following reasons for opposing the proposed changes to the CD regulations:</p> <ul style="list-style-type: none"> • It would most negatively impact the most vulnerable student populations (English language learners, students with disabilities, low-income students, and students of racial and ethnic minorities). • It would incentivize test preparation in classrooms at the expense of meaningful instruction and support. • It would increase students' stress and anxiety levels. 	<p>DESE is committed to holding all students to high standards for academic success. Students are capable of meeting high standards and the Commonwealth and its educators should support them to do that.</p> <p>One of the recommendations from the Competency Determination Advisory Committee was to increase awareness of alternate pathways, and DESE plans to implement an awareness campaign alongside any changes to the CD requirements.</p>

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<ul style="list-style-type: none"> • It would elevate MCAS as a credible measure of student achievement. • Increasing access to alternative pathways to graduation should be a priority • Eliminate the requirement to retest if a student does not pass on the first attempt. 	<p>Eliminating the requirement to retest would take away opportunities for students to pass the tests and fulfill the requirements of the CD.</p>
<p>Unique Emails from Individuals – Opposed</p> <p>Many of 100 remaining emails from individuals opposed to the changes cited the same reasons as those in the form email described above, along with other reasons.</p> <p>The most common additional reasons cited for opposition to the changes (more than 10 mentions) are as follows:</p> <ul style="list-style-type: none"> • Recent pandemic and learning interruptions • The proposed changes would cause an increase in undue pressure on teachers • MCAS should be used as a measure of schools, not of individual students • MCAS uses funds that could be used for other purposes • The proposed changes will increase the rate of high school dropouts <p>Fourteen respondents called for the MCAS tests to be eliminated altogether.</p> <p>Eleven respondents called for eliminating MCAS as a high school graduation requirement.</p>	<p>In September 2021, in recognition of the unavoidable delays and changes in our plans caused by the pandemic, the Board extended the interim passing standard through the class of 2025 for all three subjects. The proposed standards would not take effect until the class of 2026 (current 8th graders).</p> <p>Assessments are required under both federal law (Every Student Succeeds Act) and state law (Education Reform Act). These laws require the reporting of student-level results and the use of high school MCAS tests as one requirement for high school graduation.</p>
<p>Emails from Organizations - Opposed</p> <p>DESE received emails from three school districts and four organizations that are not in favor of the proposed changes.</p> <p>School districts/committees:</p> <ul style="list-style-type: none"> • Boston Public Schools • Dedham School Committee 	<p>No additional comments</p>

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<ul style="list-style-type: none"> • Norton School Committee and Public Schools <p>Organizations:</p> <ul style="list-style-type: none"> • AFT Massachusetts • Massachusetts Association of Teachers of Speakers of Other Languages • Massachusetts Teachers Association • Multistate Association for Bilingual Education - Northeast <p>These districts and organizations cited similar reasons for not supporting the proposed changes as the individual emails and the form email described above.</p> <p>In addition, one or more of the districts/organizations suggested the following changes:</p> <ul style="list-style-type: none"> • Expand access to alternative pathways to graduation • Increase parent and student involvement in EPP planning • Delay changes to the CD requirements until further data and analysis is available • Eliminate the requirement that a student must take the MCAS multiple times if they do not pass on the first attempt • Provide additional funding to districts to provide students with the resources to meet the higher standards 	
<p>Emails in support</p> <p>Four commenters (one individual and three organizations) expressed support for the proposed changes. The organizations were the Massachusetts High Technology Council, the Massachusetts Business Alliance for Education, and Education Reform Now Advocacy. These commenters cited the following reasons for their support:</p> <ul style="list-style-type: none"> • Increasing the passing score will better prepare students to meet the increasing rigor of college admissions and the job market 	No comments.

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<ul style="list-style-type: none"> • The research from Brown University makes it clear that a higher standard is needed • Marginalized students will receive the most benefit from this change, as it pushes students to achieve at higher levels <p>All three organizations stated that the standard should be further pushed to a passing score of 500 for the class of 2030 and beyond, so that students must be in the Meeting Expectations category in order to earn a diploma.</p> <p>Two of the organizations also stated that the EPP process should be strengthened and/or eliminated, to reduce the likelihood of a student graduating without being college- and career-ready.</p>	