



Comments Regarding Proposed Amendments to Regulations 603 CMR 2.00 Accountability and Assistance for School Districts and Schools

From the Massachusetts Business Alliance for Education; Massachusetts High Technology Council; Retailers Association of Massachusetts; Greater Boston Chamber of Commerce; Neponset Valley Chamber of Commerce; North Central Massachusetts Chamber of Commerce; SouthCoast Chamber; Springfield Regional Chamber; Worcester Regional Chamber of Commerce; and Economic Development Council of Western Massachusetts

The Massachusetts Business Alliance for Education (MBAE) is committed to the compact it helped forge as part of the Education Reform Act of 1993 - establishing high standards, holding districts accountable for meeting these, and allocating funds sufficient to ensure educational equity for all students. Without a comprehensive and objective evaluation system this education reform compact, which has resulted in significant progress for students in Massachusetts, would be broken.

Business leaders across the Commonwealth understand the importance of verifying the efforts of all public schools and districts to promote higher levels of student academic attainment and close persistent gaps in achievement that limit opportunity. So, we are pleased that the new system will “provide information about school performance and student opportunities beyond test scores”. It is critical that the inclusion of these measures give educators the actionable data they need to inform instruction, resource allocation and other decisions affecting student learning without giving the public a false impression about the quality of their public schools.

The recommendation to maintain the current achievement-to-growth ratio of 3:1 therefore has our full support. Achievement measures aligned to standards should be the primary driver of the classification of schools and districts since growth is not a guide to whether a student is meeting grade level expectations. Growth is valuable to consider only as a factor in whether schools are doing the work necessary to promote learning and achievement. This is especially true if the next generation MCAS meets expectations by providing a true indicator of college and career readiness, unlike the original test which was designed to gauge the low bar of basic proficiency.

While optimistic about these components of the proposed regulations, we have three areas of concern that we believe this Board should address before approving final regulations:

1) Use of “Targets” for Accountability Ratings

Setting “targets” for each school and district based on their own baseline data seems reasonable in theory since schools and districts have unique starting points with different challenges to face. Flexibility to provide more rigorous targets for low performing schools that have more growth to gain makes hypothetical sense, but poses unacceptable risks in practice. Without specifying who

sets the targets, how long schools and districts will be given to make progress and to meet these, and what supports will be available to assure success, these regulations offer wide discretion without providing clear oversight or guarantees to parents that their children will not be left behind. The Board should specify parameters for these targets based on the imperative that when exponential change is needed, incremental change is not an option.

2) Framework for District Accountability

MBAE represented employers and Board Member Joseph Esposito chaired the Accountability and Assistance Advisory Council that helped the Department of Elementary and Secondary Education (DESE) develop and implement our current five level categories. We understand the resistance to being labeled underperforming or chronically underperforming and the pressure to replace those accountability categories. Yet, the proposed three categories with three more sub-categories based on the progress that schools are making and the support they receive from the state will not change what is happening for students in those schools. According to the draft regulations, “Under the framework, districts shall hold their schools accountable for educating their students well and assist them in doing so; the Department shall hold districts accountable for both of these functions and assist them in fulfilling them.” This level of ambiguity risks putting DESE under constant pressure to adjust expectations and demands to accommodate district requests and asks for a level of trust and confidence from parents and students that is not warranted by past experience. More clarity is needed for public understanding of what each category signifies.

3) Removing Standards and Indicators

According to the proposed regulations, DESE shall publish a detailed version of the standards and associated indicators for district reviews, “which shall be informed by research-based practices identified as characteristic of schools that have experienced rapid improvements in student outcomes.” Since changes to regulation require public input, replacing regulatory standards and indicators with vague direction to DESE leaves wide discretion for future administrators to make adjustments that do a disservice to our students. This change should be rejected as a preemptive effort to insulate districts from poor results and deny the public the true indication of readiness for postsecondary pursuits that an effective accountability provides.

The proposed regulations follow the approach taken previously in focusing attention on improving the lowest performing schools and districts. While this emphasis is essential and where the greatest resources are needed and should be directed, it is equally important that we focus support on preventing those on the cusp of joining these schools’ ranks from doing so. Similarly, identifying and replicating successful practices of high performing schools was also an original concept of our accountability system that should not be lost in the new system.

If Massachusetts is serious about closing achievement, opportunity and skills gaps, our accountability system should have neither the appearance nor the effect of lowering our expectations for student performance.

For more information, please contact:

Linda M. Noonan, Executive Director
Massachusetts Business Alliance for Education
lnoonan@mbae.org