**Summary of Public Comments Concerning Proposed Amendments to the Massachusetts Charter School Regulations, 603 CMR 1.00**

**DRAFT for DISCUSSION ONLY - February 2014**

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| **Key Comments** | **Department Response to Comments and Recommendations** |
| Requests for clarification about Horace Mann charter schools |  |
| * Collective bargaining (“work rules” versus “agreed upon provisions of collective bargaining agreement”)
 | Clarified the regulation  |
| * Staffing decisions (Hiring, firing, etc.)
 | Agreed that there are some ambiguities, but absent legislation, Department focus is on holding board of trustees responsible – no change recommended |
| * District/school responsibilities
 | Clarified the regulation  |
| * MOU (union sign-off opening procedures, etc.)
 | Response to some misperceptions - no change recommended |
| * Enrollment preferences
 | Clarified the regulation  |
| * Amendments
 | Clarified the regulation  |
| Concerns about changing the requisite two phase application process – (losing the current transparency and thoroughness of our review process)  | Removed sentence in its entirely |
| Request for applicants and the Department to respond to public comment during the application review process  | Response to some misperceptions - no change recommended |
| Proven provider – more focus on access and equity, more disaggregated data (statute doesn’t talk about race); requiring information about suspension, along with expulsion  | Incorporated some of the suggested changes |
| Allowing weighted lotteries of some kind  | Beyond the scope of statute – no change recommended |
| Recruitment and Retention plan – including specific strategies about disciplinary issues  | Beyond the scope of statute – no change recommended |
| Boards of Trustees – training (clarification); requests that we emphasize fiduciary responsibilities, along with state ethics and open meeting law responsibilities, also requests to require board meeting in the local communities  | Incorporated some of the suggested changes |
| Charter schools and teacher evaluations  | Beyond the scope of the statute – no change recommended |
| Investigations – “all significant matters”  | Clarified the regulation  |
| Amendments – concerns about charter schools changing location of facilities | Clarified the regulation about changing locations in districts already specified in charter |
| Closing schools if they don’t have comparable populations – failure to comply with Recruitment and Retention plan  | Inconsistent with statute – no change recommended |
| Concerns about waivers (in general, opening procedures, delegation) | No change recommended |
| General concerns about delegation of authority from Board to Commissioner (Amendments, possible waivers-not even included in the amended regulations) | No change recommended |