Black text represents substantive feedback from U.S. Department of Education (ED) received July 2017.

Red text summarizes Massachusetts Department of Elementary and Secondary Education’s planned responses.

**Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies**

1. **Graduation rates.** The calculation of a five-year adjusted cohort graduation rate must align with the definition in the Elementary and Secondary Education Act (ESEA).SUMMARY RESPONSE: We will calculate the four-year graduation rate in accordance with the ESEA definition. We will also calculate an annual dropout rate and an extended engagement rate that includes the five-year graduation rate plus the percentage of students still enrolled in school after five years, and use these rates as additional indicators of school quality or student success for high schools. These three indicators—the four-year graduation rate, the dropout rate, and the extended engagement rate—will carry equal weighting in high school accountability calculations.
2. **Grade-level proficiency.** ESEA requires a state to include a measure of grade-level proficiency on statewide assessments in reading/language arts and mathematics as an academic achievement indicator. Massachusetts may use average scaled scores as an indicator of school quality or student success, but must use a separate measure of proficiency to measure academic achievement.  
   SUMMARY RESPONSE: We do not plan to change our original proposal to use the average scaled score as a measure of academic achievement in Massachusetts’ district and school accountability system. The average scale score better represents the range of scores at the district and school level. By signaling how all students in the district or school are performing, districts and schools are able to focus on improvement for all students, as opposed to the narrow focus on “proficient versus not” that results from the use of proficiency rates.
3. **Broad and challenging coursework.** Under ESEA indicators of school quality or student success must be comparable across all schools. It is unclear from Massachusetts’ description of its proposed use of a measure of completion of broad and challenging coursework whether this is a measure that would be comparable across schools.

SUMMARY RESPONSE: For high schools, we will include an indicator of school quality or student success related to successful completion of broad and challenging coursework. This measure will represent the percentage of all enrolled 11th and 12th graders that complete a broad course of study (MassCore) or achieve a passing score in challenging coursework, including but not limited to Advanced Placement, International Baccalaureate, honors, dual enrollment, and other advanced courses.

1. **Weighting of indicators.** ESEA requires that the academic achievement, other academic, graduation rate, and progress in achieving English language proficiency indicators have much greater weight than school quality or student success indicators. It is unclear from Massachusetts’ description of its planned weighting of indicators whether Massachusetts meets this requirement.

SUMMARY RESPONSE: We will clarify our plans for including a criterion-referenced component in the assignment of summative accountability ratings. Schools will initially be classified into a performance level based on their accountability index. Massachusetts will set performance targets for the lowest performing students in each school, which, if met, would allow the school to earn a higher summative rating. By setting performance targets for the lowest-performing students in each school that are based on core measures (achievement, growth, graduation rates, and English language proficiency), we can ensure that these indicators remain weighted in accordance with the statute.

1. **Accountability for all schools.** ESEA requires a state to include all public schools in its accountability system. It is unclear from Massachusetts’ description of how very small schools and schools serving untested grades are included in its accountability system whether Massachusetts meets this requirement.  
   SUMMARY RESPONSE: We will provide additional information to ED regarding the inclusion of all schools in our accountability system. Specifically, Massachusetts will assign a summative classification of “Insufficient Data” to schools that do not meet the minimum number of students required for accountability reporting. We will use the same “Insufficient Data” classification for schools that do not serve tested grades, and explore a protocol for assigning a summative rating based on available measures for these schools. At a minimum, available measures will include chronic absenteeism for all students and English language proficiency for English learners.
2. **Frequency of identification.** ESEA requires that a state identify schools for comprehensive support and improvement, and schools identified for additional targeted support, at least once every three years. It is unclear from Massachusetts’ description how frequently it plans to identify such schools.  
   SUMMARY RESPONSE: Massachusetts will identify schools in both categories at least once every three years, in accordance with the statute.
3. **Identifying schools for targeted support and improvement.** ESEA requires a state to describe its methodology for identifying schools with one or more consistently underperforming subgroups. It is unclear from Massachusetts’ description whether it meets these requirements.

SUMMARY RESPONSE: Consistently underperforming subgroups within schools will be identified using the same index methodology used to identify schools for comprehensive support and improvement. Schools with consistently underperforming subgroups will be identified as in need of targeted support and improvement for the first time in the fall of 2018 using results from 2016-17 and 2017-18. In subsequent years we intend to build up to a system that uses three or four years of data.

1. **Schools in need of additional targeted support.** ESEA requires that a state describe its methodology for identifying schools in need of additional targeted support (schools in which any subgroup of students demonstrates performance equivalent to the lowest performing five percent of schools in the aggregate). It is unclear from Massachusetts’ description how it plans to identify such schools.

SUMMARY RESPONSE: In accordance with the statute, Massachusetts will notify districts that have schools in need of additional targeted support. Using the same index methodology used to identify schools for comprehensive support and improvement, any subgroup performing below the lowest five percent of schools in the aggregate will be included in the notification. Districts receiving these notifications will be required to meet planning requirements outlined in the statute.

1. **Exit criteria for schools in need of additional targeted support.** ESEA requires states to establish exit criteria for schools receiving additional targeted support. In its plan, Massachusetts indicated that it has not yet established statewide exit criteria for these schools.

SUMMARY RESPONSE: Districts that have schools with subgroups performing below the lowest five percent of schools in the aggregate will be notified as described above. A school will no longer be considered in need of additional targeted support when its subgroups do not perform below the lowest five percent of schools in the aggregate, using the same index methodology.

**Title I, Part C: Education of Migratory Children**

* **Program planning, evaluation, and integration of programs.** ED has requested Massachusetts to provide additional information regarding specific requirements related to program planning, evaluation, and integration with other federal programs.SUMMARY RESPONSE: We will provide additional information to ED that is responsive to their requests.

**Title I, Part D: Programs for Children and Youth who are Neglected, Delinquent, or At-Risk**

* **Objectives and outcomes.** ESEA requires a state to describe objectives and outcomes that can be used to assess the effectiveness of the Title I, Part D program*.* Massachusetts proposed to use its statewide goal of preparing all students for success after high school and five primary strategies to support this goal to meet this requirement; however, this goal and strategies are too broad to meet the requirement.SUMMARY RESPONSE: We will provide additional information to ED that is responsive to their request.

**Title IV, Part A: Student Support and Academic Enrichment Grants**

* **State-level activities.** ESEA requires a state to describe how it will use Title IV, Part A funds for state-level activities. It is unclear from the description Massachusetts provided whether it meets this requirement.SUMMARY RESPONSE: We will use Title IVA, Part A state-level funds for staff activities that support supplemental efforts to advance ESE’s strategic priority of supporting social and emotional learning, health, and safety.

**Title V, Part B: Rural and Low Income School Program**

* **Objectives and outcomes.** ESEA requires a state to describe objectives and outcomes that can be used to assess the effectiveness of the Title V, Part B program*.* Massachusetts proposed to use its statewide goal of preparing all students for success after high school and five primary strategies to support this goal to meet this requirement; however, this goal and strategies are too broad to meet the requirement.SUMMARY RESPONSE: We will provide additional information to ED that is responsive to their request.

**McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youth Program**

* **Access to services & strategies to address problems.** Massachusetts’ plan does not describe procedures to ensure homeless children have access to public preschool programs. Similarly, Massachusetts’ plan does not describe procedures that ensure homeless children have access to various school types and programs (e.g., magnet schools, charter schools, advanced placement, summer schools, etc.), nor does the plan provide strategies to address problems resulting from enrollment delays caused by guardianship issues. As a result, it is unclear whether Massachusetts meets these McKinney-Vento Act requirements.SUMMARY RESPONSE: We will provide additional information to ED that is responsive to their requests.