Summary of Public Comments on Proposed Changes to the District and School Accountability System

The Massachusetts Department of Elementary and Secondary Education (Department) solicited public comment on proposed changes to the state’s district and school accountability system from April 12 to May 31, 2019. The Department received correspondence from 40 individuals through email and a dedicated public comment survey tool: 31 submitted comments as individuals and 9 submitted comments on behalf of their school or district. A complete list of individuals who submitted comments is included at the [end of this document](#_List_of_individuals).

Many commenters expressed support for the proposed changes, while others shared concerns about the changes. The topics most frequently mentioned by commenters opposed to the proposed changes are summarized in the table below, along with the Department’s responses.

| **Summary of Public Comment**  |
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| **Public Comment Received** | **Department’s Response** |
| **Accountability Indicators** |
| The list of advanced courses should include more than proprietary courses like Advanced Placement (AP), International Baccalaureate (IB), and Project Lead the Way (PLTW), which require a financial commitment by the district. (Chapman, Dillman, Hochheiser, Kidwell, Lee, Miller, Werner) | No changes. The Department has identified a [list of courses](http://www.doe.mass.edu/accountability/advanced-courses.docx) including but not limited to AP, IB, and PLTW that are considered “advanced” for the purposes of accountability reporting. This list will be reviewed on an annual basis, and additional courses may be added, where appropriate.  |
| Chronic absenteeism should not be included as an indicator in the accountability system, as student attendance is outside of the school’s or district’s control. (Bevilacqua, Curley, Moore, Santaniello) | No changes. The federal Every Student Succeeds Act (ESSA) requires that each state’s accountability system include at least one measure of school quality or student success. Massachusetts uses chronic absenteeism because the district and school accountability system should incentivize a minimal loss of instruction time. There has been significant research on the impact of absenteeism. Two examples can be found [here](http://cep.lse.ac.uk/pubs/download/dp1302.pdf) and [here](http://www.jstor.org/stable/2112677?seq=1#page_scan_tab_contents). |
| The calculation of chronic absenteeism rates should take into consideration the reason for or kind of absence (e.g., absences due to medical issues, extended travel outside of the country, and excused versus unexcused absences). (Bernier, Franty, Kidwell, Lee, McGilvray-Rivet, Miller, Molina-Dean, J. Robidoux) | No changes. See above. While some absences are understandable and perhaps might be excused, ultimately the student has lost instruction time regardless of the reason. Additionally, the Department has clarified its expectations regarding [student attendance reporting](http://www.doe.mass.edu/infoservices/data/sims/reporting-guidance.docx) to better capture instruction that take place outside of the traditional classroom setting.  |

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| Using Two Years of Data |
| The accountability system should not include two years of data because the system is still very new. (Callahan, Franty, Kopala, Luczynski, Quinto) | No changes. The Department believes that using multiple years of data in the accountability system stabilizes the results and better represents trends in performance. |
| Participation Rate Calculation |
| The proposed change to the participation rate calculation does not take into consideration those students who are unable to participate in the assessment due to medical reasons. (Arnold, McGilvray-Rivet) | No changes. Federal law requires each district and school to maintain a 95 percent participation rate, and state law requires all students to participate in the statewide assessments that correspond to their grade. The Department’s revised participation rate calculation used for accountability determinations will mitigate the impact of small subgroups. Furthermore, the Department has an established accountability appeals process through which schools and districts may request that their accountability determination be changed if low participation is the only factor that is negatively affecting the school’s or district’s overall determination.  |
| The proposed change to the participation rate calculation may not do enough to mitigate the impact of one or two non-participations in small subgroups. (Chapman, Hopson) | No changes. See above.  |
| Categorization of Districts and Schools |
| There should be additional categories that reflect school and district progress towards targets within the criterion-referenced part of the accountability system. (Dillman, Foster, Woodbury) | The Department has added a fourth category related to progress towards targets, and renamed the categories as follows: * *Meeting or exceeding targets* (criterion-referenced target percentage 75-100)
* *Substantial progress towards targets* (criterion-referenced target percentage 50-74)
* *Moderate progress towards targets* (criterion-referenced target percentage 25-49)
* *Limited or no progress towards targets* (criterion-referenced target percentage 0-24)
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# List of individuals submitting public comment:

* Scott Andrade
* Jennifer Arnold
* Barbara Beaudoin Turkel
* Nicholas Bernier
* Gena Bevilacqua
* Timothy Callahan
* Kelly Cooney
* Brian Curley
* Joyce Edwards
* Lee Franty
* Lori A. Gallivan
* William Green
* David Hochheiser
* Sarah Hopson
* Rachel Joseph
* Stephanie Kopala
* Jennifer LaCava
* James Lee
* Sara J. Luczynski
* Susan McGilvray-Rivet
* Courtney Miller
* Carla Molina-Dean
* Susan Moore
* Wendy Phillips
* Angela Quinto
* Carl Robidoux
* Elaine Santaniello
* Rebecca Slawson
* Colleen Werner
* Carol Woodbury
* Michelle (no last name provided)

# List of individuals submitting public comment on behalf of their school or district:

* Jessica B. Callanan (Woburn Memorial High School)
* Maureen Chapman (Rising Tide Charter Public School)
* Mary Dillman (Boston Public Schools)
* Paul Foster (Springfield Public Schools)
* Hope Hanscom (Mashpee Public Schools)
* Rebecca Kidwell (Braintree Public Schools)
* John Robidoux (Swansea Public Schools)
* Geoff Rose (Oliver Hazard Perry K-8 School, Boston)
* Michael Rubin (Uxbridge High School)