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 December 28, 2023 to January 12, 2024. The Department received correspondence from 34 individuals through email: 30 submitted comments as individuals and four submitted comments on behalf of their organization. A complete list of individuals who submitted comments is included at the [end of this document](#_List_of_Individuals_1).

Most commenters expressed concerns about the proposed increase in the weight of the chronic absenteeism indicator, while only a small number of individuals commented on the number of years of data included in 2024 calculations. The topics most frequently mentioned by commenters are summarized in the table below, along with the Department’s responses.

# Summary of Comments Received

| **Public Comment Received**  | **Department’s Response**  |
| --- | --- |
| **Increasing the Weight of the Chronic Absenteeism Indicator**  |
| Chronic absenteeism is outside the control of districts and schools and is a larger problem that requires additional resources and support from the Department, other agencies, and partners. (Ahern, Aubin, Bartholomew, Brighenti, Burnham, Caliri, Cote, Geiser, Kwong, Lee, McElhinney, Monárrez, Mucha, Pender, Schwamb, Shorter, Smith, Taylor, Tellier, Tolpa, MASS)  | 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 to support the belief that all students should be present and engaged in learning so that they graduate prepared for the rigors of post-secondary education, training, and work. Furthermore, the Department’s proposal does not require districts and schools to eliminate chronic absenteeism; rather, it requires improvement from the previous year. |
| Increasing the weight of the chronic absenteeism indicator exacerbates existing inequalities and penalizes districts and schools that serve historically marginalized populations, including those that are now housing emergency shelters in their communities. (Chuang, Janda, Shorter, Smith, Tolpa, MCPSA) | No changes. The Department’s [Educational Vision](https://www.doe.mass.edu/commissioner/vision/vision-supports.pdf) aims for all students, particularly those from historically underserved groups and communities, to have equitable opportunities to excel in all content areas across all grades. Through its core functions, the Department infuses efforts that help increase student attendance and supports districts in identifying and implementing initiatives that can: help students be more engaged in school, address barriers to being in school, and increase attendance. |
| The calculation of chronic absenteeism rates should consider the reason for the absence (e.g., absences due to medical issues and/or COVID-19 isolation protocols, extended travel outside of the country, and excused versus unexcused absences). (Ahern, Caliri, Choquette, Chuang, Cote, Janda, LaFlamme, McElhinney, Taylor, Tellier, MCPSA) | No changes. 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 occurs outside of the traditional classroom setting. |
| Some districts have prioritized addressing chronic absenteeism in recent years, while others plan to do so in the future (e.g., through attendance academies). Districts that did not prioritize the issue earlier should not be hurt by the Department’s decision to do so now. (Meyer, Shorter) | No changes. The intention of the proposed change is not to penalize districts or schools but rather to highlight places where student attendance remains a persistent issue requiring more strategic support or assistance. |
| Changing the weight of the chronic absenteeism indicator will affect the calculation that identifies the lowest performing 10 percent of districts (used to determine the charter cap). (Tellier, MCPSA) | No changes. The Department does not intend to change the weighting of the indicators included in the normative calculation (accountability percentile), and as a result, no changes would need to be made to the calculation of district rankings which determine the charter cap. |
| The process for determining the weight of the chronic absenteeism indicator should not be made in the middle of the school year. (Kwong, Leonardos, Meyer, Shorter, Tellier, MASS, MCPSA) | No changes. See above. In recent years, the Board of Elementary and Secondary Education has approved changes to the district and school accountability system as late as June, and the approved changes were incorporated into the results reported the following fall. In addition, the Commissioner alerted districts of his focus on chronic absenteeism at the beginning of the 2023-2024 school year. |
| The additional weight for chronic absenteeism should not come from the student achievement indicator. (Burroughs, Chuang, Leonardos, McElhinney, Mucha, Spirer, ERN, MBAE, MCPSA) | No changes. To increase the weight of the chronic absenteeism indicator, weight must be subtracted by one or more other indicators. The achievement indicator has carried the most weight in recent calculations and reducing the weight of the other indicators (high school completion, English learner progress, and student growth) would likely minimize the importance of these measures in the overall calculation of district and school performance.  |
| Chronic absenteeism is highly correlated with achievement and therefore is already accounted for within the accountability system. (Meyer, MBAE) | No changes. While there is a relationship between student attendance and achievement, ESSA requires that each state include achievement measures and at least one measure of school quality or student success in its accountability system. The Department continues to include chronic absenteeism in its system to fulfill this requirement. |
| **Including Three Years of Data in 2024 Calculations**  |
| Including three years should be delayed until 2025, since the 2021-2022 school year was affected by strict COVID-19 guidance. (Burroughs) | No changes. Since the Department used data from the 2021-2022 school year in the calculation of the 2023 district and school accountability results, we believe it is appropriate to continue using data from that school year in the calculation of the 2024 results.  |
| **Comments on Other Matters**  |
| The Department should release accountability targets earlier in the school year. (Ford, Tellier)  | No changes. This comment is unrelated to the proposed changes to the accountability system.  |
| The Department should lower the participation requirement that triggers the determination of requiring assistance. (Costigan)  | No changes. This comment is unrelated to the proposed changes to the accountability system. |

# List of Individuals and Organizations Submitting Comments

## Individuals

* Sara Ahern (Barnstable Public Schools)
* Thomas Aubin (Westport Public Schools)
* Justin Bartholomew (Pentucket Regional School District)
* Gregg Brighenti (Lee Public Schools)
* Kate Burnham (Lunenburg Public Schools)
* Stephanie Burroughs (Foxborough Public Schools)
* Charles Caliri (Ayer-Shirley Regional School District)
* Beth Choquette (Richmond Consolidated School)
* Cliff Chuang (Bedford Public Schools)
* Stephanie Costigan (Truro School District)
* Tracie Cote (Wareham Public Schools)
* Robert Ford (Lincoln Public Schools)
* Jill Geiser (Belmont Public Schools)
* Becky Janda (Nantucket Public Schools)
* Brandi Kwong (Methuen Public Schools)
* Bryant LaFlamme (Assabet Valley Regional Technical High School)
* Jim Lee (Braintree Public Schools)
* Nicholas Leonardos (Lowell Community Charter Public School)
* Peggy McElhinney
* Steven Meyer (Clinton Public Schools)
* Rachel Monárrez (Worcester Public Schools)
* Colleen Mucha (Quabbin Regional School District)
* Elaine Pender (Orleans Public Schools)
* Andrea Schwamb (Wareham Public Schools)
* Jennifer Shorter (Lynn Public Schools)
* JoAnn Smith (Amherst, Pelham, and Amherst Regional School District)
* Bill Spirer (Springfield Prep Charter School)
* Isaac Taylor (Belmont Public Schools)
* Sonia Tellier (Falmouth Public Schools)
* Chris Tolpa (Westfield Public Schools)

## Organizations

* Education Reform Now Massachusetts (ERN)
* Massachusetts Association of School Superintendents (MASS)
* Massachusetts Business Alliance for Education (MBAE)
* Massachusetts Charter Public School Association (MCPSA)