

Massachusetts Department of Elementary and Secondary Education

75 Pleasant Street, Malden, Massachusetts 02148-4906

Telephone: (781) 338-3000
TTY: N.E.T. Relay 1-800-439-2370

Mitchell D. Chester, Ed.D.
Commissioner

MEMORANDUM

To: Members of the Board of Elementary and Secondary Education
From: Mitchell D. Chester, Ed.D., Commissioner
Date: February 12, 2016
Subject: Greenfield Commonwealth Virtual School – Renewal Recommendation and Report on Probation

Pursuant to the regulations for Commonwealth of Massachusetts Virtual Schools (CMVS) at 603 CMR 52.12(1) and (2),¹ I recommend that the Board of Elementary and Secondary Education (Board) renew the certificate for the Massachusetts Virtual Academy at Greenfield Commonwealth Virtual School (GCVS) for an additional three years, the minimum permitted by statute. See G.L. c. 71, § 94(j). I further recommend that the Board extend probation with additional conditions placed on the school's certificate. Additionally, in the latter portion of this memorandum, I offer some reflections on the Commonwealth's experience with full-time virtual schools since the passage of the Commonwealth Virtual Schools statute, G.L. c. 71, § 94, in January 2013. My reflection provides further context for my recommendation.

The Department of Elementary and Secondary Education (Department) evaluated the performance of GCVS against the Commonwealth Virtual School Performance Criteria,² using quantitative and qualitative evidence reported by the school and collected by the Department throughout the school's certificate term. The evidence included, but was not limited to, state academic assessment data, the school's self-determined goals in its approved Accountability Plan, annual reports, audited financial information, and data collected from June 2014 and March 2015 accountability reviews. GCVS underwent a comprehensive renewal process that included the submission of a renewal application in June 2015 and a renewal inspection visit in November 2015 (see Attachment A). My recommendation is the culmination of this process.

¹ At 603 CMR 52.12(2), the regulations provide that the Board may place a Commonwealth of Massachusetts virtual school on probation if in its judgment the imposition of a condition alone would be insufficient to remediate the problem. The Board may impose conditions on the virtual school's certificate that require the virtual school to address specific areas of concern. Placing a virtual school on probation signals concern about the virtual school's viability and permits the Board to suspend a virtual school's certificate immediately if the virtual school fails to remedy the causes of its probation. The Department may require a virtual school on probation to establish an escrow account in an amount determined by the Department in consultation with the virtual school to pay for closing, legal, and audit expenses associated with closure should that occur.

² <http://www.doe.mass.edu/odl/cmvs/PerformanceCriteria.pdf>

Massachusetts Virtual Academy at Greenfield Commonwealth Virtual School			
Year opened:	As an Innovation School: September 2010 As a Commonwealth of Massachusetts Virtual School: July 1, 2013	Year(s) renewed (if applicable):	0
Name of educational management organization:	K12, Inc.	Location of administrative offices:	278 Main Street Suite 205 Greenfield, MA 01301
Maximum enrollment	1250 ³	Current enrollment:	661 students as of February 2, 2016
Grade span:	K-12	Number of sending districts served:	170 as of December 8, 2015
Number of instructional days per year:	181	Students on waitlist:	52 (high school) as of December 8, 2015
Mission statement: Massachusetts Virtual Academy at Greenfield [Commonwealth Virtual School], the Commonwealth's first virtual K-12 public school, delivers a transformative education with unique strengths and flexibility perfectly suited for the modern world. Our approach encourages critical thinking and an independent learning style that meets the key needs of diverse learners by providing educational resources that cultivate curiosity, exploration and inquiry.			

The Massachusetts Virtual Academy of Greenfield (MAVA) opened in 2010 under the innovation school law, G.L. c. 71, § 92. On January 2, 2013, Governor Patrick signed into law Chapter 379 of the Acts of 2012, "An Act Establishing Commonwealth Virtual Schools" (Act), most of which is codified as G.L. c. 71, § 94. By statute, MAVA ceased to exist as of July 1, 2013. Section 6 of the Act required the Board to grant a certificate to operate a CMVS for GCVS upon submission of a timely application that addressed the information specified in G.L. c. 71, § 94.

On June 25, 2013, the Board granted a three-year certificate to the board of trustees of GCVS, effective July 1, 2013. The board of trustees assumed governance of the virtual school, now known as GCVS, a CMVS. During the transition, the Greenfield Public Schools provided services to the school through April 1, 2014, under a memorandum of understanding. My recommendation to award a CMVS certificate was consistent with the requirements of section 6 of the Act, in which the Legislature intentionally set a unique bar for the award of an initial certificate to Greenfield. In doing so, the Legislature acknowledged Greenfield's pioneering role in establishing a virtual innovation school and expressed its intent to give Greenfield a fair opportunity to adjust to the extensive requirements of the new statute. Allowing the school to transition to this new status also minimized the disruption for currently enrolled students. To assist the school in meeting those high standards, the Board approved my recommendation that conditions be placed on its operating certificate, with each of these items subject to the review

³ GCVS was approved to enroll 1,000 students in FY2015 and 1,250 students in FY2016.

and approval of the Department. These terms were described in my memorandum to the Board dated June 18, 2013 (see Attachment B).⁴

Probation with Conditions

On June 5, 2014, the Department conducted an accountability review of GCVS in accordance with 603 CMR 52.08(2). The report was completed on September 17, 2014, after the results of the Spring 2014 MCAS tests became official. The resulting site visit report documented concerns about the school's faithfulness to its certificate, the quality of the academic program, the quality and level of supports for diverse learners, and the school's lack of compliance with regulatory requirements and Department guidance. Due to these concerns, pursuant to 603 CMR 52.12(2) the Board approved my recommendation to place GCVS on probation for the remainder of the school's certificate term, which expires on June 30, 2016, with additional conditions. A report of the school's progress towards meeting those conditions is provided later in this memorandum.

Progress Toward Meeting Conditions

The Department conducted a second review of GCVS on March 2, 2015. The review indicated that GCVS had made progress toward meeting the terms of its probation and noted that the board of trustees and leadership took affirmative steps to improve instruction and professional development. The review, however, found that the school depended on teacher-developed materials to ensure alignment to the curriculum frameworks, noting that GCVS lacked a centralized curriculum coordination process; the lack of a formal curriculum for English language learners; the lack of a formal inclusion model for students with disabilities; and uneven instruction.

On November 2, 2015, the Department conducted a renewal inspection review of GCVS. The renewal inspection noted that GCVS had allocated additional resources to support students with disabilities and English language learners; implemented systems to monitor the efficacy and impact of its instructional program; taken steps to support the professional development of teachers; and made significant investments in staffing to help students and learning coaches⁵ adjust to the virtual environment, address students' nonacademic needs, and create a sense of community among all stakeholders at GCVS. As was the case during the review in March 2015, instruction remained uneven, and some areas of alignment of the school's curriculum to the curriculum frameworks continued to be dependent on teacher-developed materials.

The school's contract with K12, Inc. expires at the end of this school year. On October 19, 2015, the school's board voted to issue a Request for Proposals (RFP) inviting responses from education management organizations regarding the provision of educational and other services to GCVS. The board's stated priorities in selecting a new vendor are cost effectiveness; responsiveness to board directives; the quality of the curriculum and supporting materials, including alignment to the Massachusetts Curriculum Frameworks; and emphasis on professional development. GCVS is currently reviewing responses from three organizations, and the board expects to select a vendor by the end of March 2016.

⁴ <http://www.doe.mass.edu/boe/docs/fy2013/2013-06/item3.html>

⁵ According to GCVS, a learning coach is a responsible adult who may also be the parent of a student enrolled in the school. The learning coach is not the student's teacher.

The six conditions imposed when the Board placed GCVS on probation and the progress GCVS has made toward meeting those conditions follows. As summarized below, GCVS met these conditions except for the condition that it show significant academic improvement in mathematics and English language arts.

Condition 1: By October 31, 2014, GCVS will submit to the Department a final draft of a contract with K12, Inc., that addresses all issues already communicated to GCVS by the Department, for approval by the Commissioner.

Status: Met

GCVS complied with this condition and executed an approved contract with K12, Inc. As noted in the renewal inspection report, the GCVS board did not formally evaluate K12, Inc. or order corrective actions of K12, Inc. as stipulated in the contract for the school's failure to achieve certain accountability goals. As noted in this memorandum, GCVS is evaluating proposals from three education management organizations to provide educational and other services to GCVS beginning in the 2016-17 school year. Pursuant to 603 CMR 52.10(2)(1), contractual relationships with an individual or entity providing or planning to provide substantially all the virtual school's educational services require my approval.

Condition 2: By December 31, 2014, GCVS will provide evidence to the Department that it has completed the alignment of its curriculum to the [Massachusetts Curriculum Frameworks](#).⁶

Status: Met

GCVS provided documents indicating alignment of the K12, Inc. curriculum to the curriculum frameworks. Evidence from the alignment documents, accountability reviews, and the renewal inspection indicates that teachers supplement the K12, Inc. curriculum with materials they develop on their own, but the ratio of prepared materials to teacher-developed materials varies from subject to subject. As noted in this memorandum, the quality of the curriculum and supporting materials, including alignment to the Massachusetts Curriculum Frameworks, is a key criterion that GCVS will use to evaluate proposals from education management organizations.

Condition 3: By December 31, 2014, GCVS will submit to the Department a comprehensive evaluation of the school's mathematics and English language arts (ELA) programs and of the school's instructional practices, such evaluation to be conducted by one or more external consultants acceptable to the Department.

Status: Met

GCVS contracted with Ignite Learning Partners, Inc., in the fall of 2014 to perform an independent review of the school's instruction. A report was delivered to the Department in December 2014. Evidence from accountability reviews and the renewal inspection indicates that GCVS is implementing recommendations of the report. For example, GCVS has established instructional expectations for teachers, implemented a multi-tiered system of support, and revised its teacher orientation and evaluation processes.

⁶ <http://www.doe.mass.edu/frameworks/current.html>

Condition 4: By January 31, 2015, GCVS will submit an action plan to the Department for approval that specifies strategies to improve mathematics and English language arts performance. The plan must address how the school will utilize and will support instructional staff to implement the plan. The plan must include a timetable for the implementation of actions, must set deadlines for the completion of key tasks, and must set clear and specific implementation benchmarks to allow the GCVS board of trustees and the Department to monitor implementation.

Status: Met

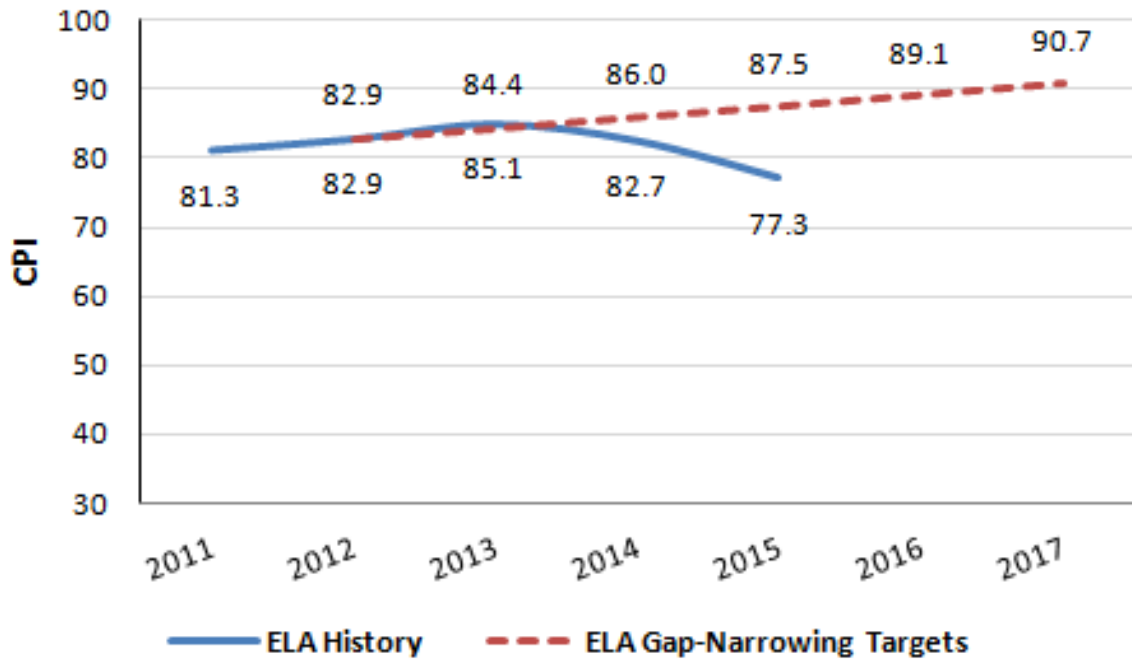
GCVS submitted an action plan to the Department that documented a range of initiatives that have been implemented including, for example, the development of new accountability goals the school believes more closely reflect the virtual environment, the development of service delivery systems for the school's English language learners and students with disabilities, and adopting the Department's criteria for virtual lesson observations.

Condition 5: By December 31, 2015, GCVS must demonstrate that it is an academic success through evidence of significant academic improvement in mathematics and English language arts.

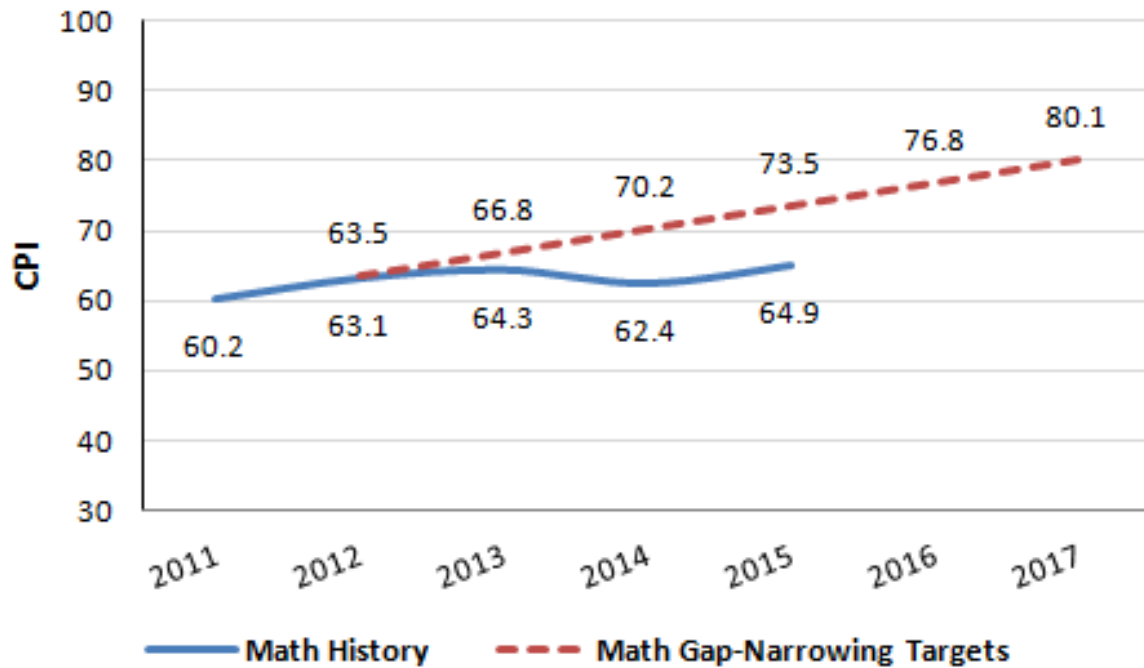
Status: Not Met

In 2014, GCVS placed at the 7th percentile of all middle/high schools and K-12 schools in the Commonwealth and was classified in Level 3 of the state's 5-level accountability and assistance system. In 2015, GCVS placed at the 8th percentile. Over the same period, GCVS did not make sufficient progress towards closing proficiency gaps as measured by the state's cumulative progress and performance index (PPI) but did make improvement on 5 of 8 indicators in English language arts (ELA) and mathematics and 8 of 12 indicators that comprise the overall PPI. GCVS continues to have difficulty meeting the state's 95 percent threshold required for assessment participation; in both 2014 and 2015, it did not meet this threshold for subgroups and for subjects.

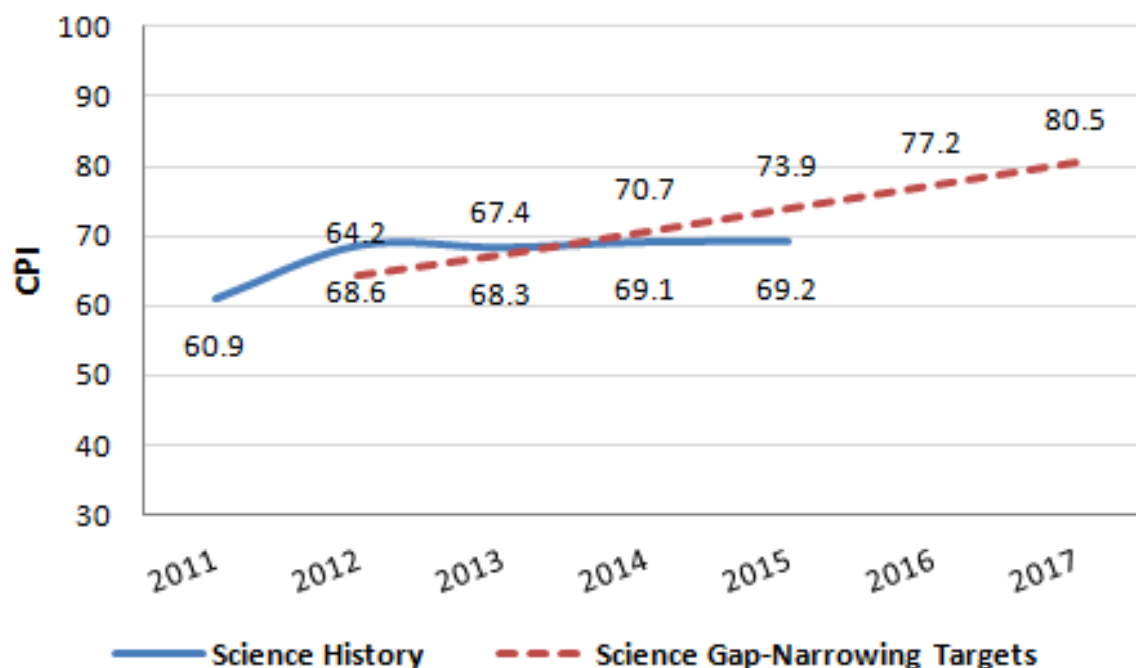
ELA Composite Performance Index (CPI), 2011-2015



Mathematics Composite Performance Index, 2011-2015



Science Composite Performance Index, 2011-2015



Student Growth Percentiles (SGP), 2011-2015

		2011	2012	2013	2014	2015
ELA	All students	26.5	29.0	35.0	32.5	40.0
	High needs		23.0	32.0	33.0	34.0
Mathematics	All students	18.0	25.0	29.0	33.0	45.0
	High needs		24.0	29.0	28.0	39.0

Condition 6: Beginning immediately and until further notice, GCVS must submit to the Department, at jgwatkin@doe.mass.edu or 75 Pleasant St., Malden, MA, 02148, board meeting agendas and materials, prior to each board meeting at the same time that these items are sent to GCVS board members. Further, GCVS must submit to the Department the minutes of these proceedings as soon as the GCVS board approves them. The Department reserves the right to require the submission of additional information, such as quarterly or monthly financial statements, if board materials do not already include this information, and the school must provide such additional information within two business days.

Status: Met

GCVS regularly provides the Department with board agendas, materials, and meeting minutes.

Renewal of Certificate

A summary of the performance record of GCVS is provided in the attached Summary of Review. The school's ratings from the Summary of Review are provided below.

Massachusetts Virtual Academy at Greenfield Commonwealth Virtual School			
<p>Rating Scale:</p> <ul style="list-style-type: none"> ● Exceeds Fully and consistently meets the criterion and is a potential exemplar in this area. ● Meets Generally meets the criterion; minor concerns are noted. ● Partially meets Meets some aspects of the criterion but not others and/or moderate concerns are noted. ● Falls far below Falls far below the criterion; significant concern(s) are noted. 			
Guiding area	Criteria	Rating	
Faithfulness to certificate	1. Mission and key design elements: The school is faithful to its mission, implements the key design elements outlined in its certificate, and substantially meets its accountability plan goals.	● <i>Partially meets</i>	
	2. Access and equity: The school ensures program access and equity for all students eligible to attend the school.	● <i>Meets</i>	
	3. Compliance: The school compiles a record of compliance with the terms of its certificate and applicable state and federal laws and regulations.	● <i>Meets</i>	
Academic and program success	4. Student performance: The school consistently meets state student performance standards for academic growth, proficiency, and college and career readiness.	● <i>Falls far below</i>	
	5. Program delivery: The school delivers an academic program that delivers improved academic outcomes and educational success for all students.	Curriculum	● <i>Partially meets</i>
		Instruction	● <i>Falls far below</i>
		Assessment and program evaluation	● <i>Meets</i>
		Diverse learners	● <i>Partially meets</i>
	6. Culture and family engagement: The school supports students' social and emotional health in a safe and respectful learning environment that engages families.	Social, emotional, and health needs	● <i>Meets</i>
Family and community engagement		● <i>Meets</i>	
Organizational viability	7. Capacity: The school sustains a well-functioning organizational structure and creates a professional working climate for all staff.	School leadership	● <i>Partially meets</i>
		Professional climate	● <i>Meets</i>
		Contractual relationships	● <i>Partially meets</i>
	8. Governance: The Board of Trustees acts as public agents authorized by the state and provide competent governance to ensure the success and sustainability of the school.	● <i>Partially meets</i>	
	9. Finance: The school maintains a sound and stable financial condition that operates in a fiscally responsible and publicly accountable manner.	● <i>Meets</i>	

The Department received letters of support of the renewal of the virtual school certificate of GCVS from Greenfield Mayor William F. Martin; Kaitlyn Loader, a senior at GCVS; and Marjorie Howard, a parent of a GCVS student (see Attachment C).

Recommendation

Pursuant to the regulations for Commonwealth of Massachusetts Virtual Schools at 603 CMR 52.12(2), I recommend that the Board renew the certificate for GCVS with continued probation for an additional three years, the minimum permitted by statute, with a maximum enrollment of 750 students. My recommendation is based on several factors, as follows.

- Enrollment at GCVS has never exceeded 700 students, and there is little evidence that significant additional demand for the school's program exists.⁷ Limiting the school's enrollment to a maximum of 750 students should focus the school's efforts on upgrading its program of instruction rather than expanding its enrollment.
- Focus group interviews with parents/guardians of GCVS students consistently indicate that the existence of a virtual option benefits many students with unique circumstances. Examples include students with social and emotional issues; students who experienced bullying in traditional public schools; students with chronic medical conditions that require in-home or hospital-based care, or otherwise necessitate frequent absence from their brick-and-mortar school; and academically or athletically gifted students who desire more flexible programming. Student Information Management System (SIMS) data collected in October 2015 provide further credence that GCVS serves a unique student population. The school's percentage (14.7) of students receiving accommodations through Section 504 places GCVS at the 99th percentile of all schools in the Commonwealth; yet only three of those students are on Individualized Education Programs (IEPs).⁸
- The Commonwealth's experiment with virtual schools is still new and worth continuing. The virtual schools law, G.L. c.71, § 94, was enacted in 2013 to create a system of oversight and accountability for virtual schools. Based upon our experience thus far with GCVS and the state's second virtual school, TECCA, I am not confident that the existing statutory structure is sufficient to provide high quality virtual schools.
- The school's current Level 3 accountability rating was calculated using two years of historical data (2011-12 and 2012-13) from the previous school, MAVA, that was under the governance of the Greenfield Public Schools. Continuing the school's probationary status with conditions gives the GCVS board additional time to demonstrate a record of academic success as a Commonwealth Virtual School, but retains the Board's ability to immediately suspend the school's certificate if it does not show continuous improvement.

⁷ In comparison, the second CMVS, TEC Connections Academy Commonwealth Virtual School (TECCA), now in its second year of operation, enrolls over 850 students as of December 2015.

⁸ Section 504 of the Rehabilitation Act of 1973 is a federal law that requires the needs of students with disabilities to be met as adequately as the needs of non-disabled students are met. A student is eligible for a Section 504 Accommodation Plan if the student has been determined to have a mental or physical impairment that substantially limits one or more major life activities.

In connection with the school's continuing probation, I recommend that the Board impose the conditions that follow. Continuing the school's probation gives the GCVS board additional time to demonstrate academic success and retains the Board's ability to immediately suspend the school's certificate if it does not meet these conditions:

1. Reporting Requirements:
 - a. GCVS must continue to submit to the Department, at odl@doe.mass.edu or 75 Pleasant St., Malden, MA, 02148, board meeting agendas and materials prior to each board meeting at the same time that these items are sent to GCVS board members. Further, GCVS must submit to the Department the minutes of these proceedings as soon as the GCVS board approves them. The Department reserves the right to require the submission of additional information, such as quarterly or monthly financial statements, if board materials do not already include this information. GCVS must provide such additional information within two business days.
 - b. Effective immediately, GCVS must submit to the Department weekly student enrollment reports that indicate the number of students enrolled on a full-or part-time basis, including the number of students residing in Greenfield.
 - c. By May 1st of each year, GCVS must submit to the Department a budget for the following fiscal year that demonstrates how the school will provide a high quality education program while adhering to the requirement that not less than 5 percent of the students enrolled in GCVS are residents of Greenfield as required by G.L. c. 71, § 94(c).
2. By March 1, 2016, GCVS must submit to the Department a corrective action plan for ensuring that not less than 95 percent of all student groups participate in state assessments.
3. By March 31, 2016, the school must establish an escrow account in an amount determined by the Department in consultation with the school to pay for any potential closing, legal, and audit expenses associated with closure, should that occur.
4. Effective beginning in the 2016-17 school year, the enrollment of GCVS shall be limited to a maximum of 750 students.
5. By December 31, 2017, GCVS must demonstrate significant and sustained academic improvement in mathematics, English language arts, and science. Should the school fail to do so, the Commissioner and the Board of Elementary and Secondary Education will consider revoking the school's charter effective June 30, 2018, and not wait until the end of the certificate term on June 30, 2019.

Based upon the success, or lack thereof, of GCVS in meeting the conditions imposed in connection with its probationary status, I will recommend further action as appropriate. The Department will continue to monitor developments at the school, and I will report to the Board the school's progress in meeting the conditions imposed on its certificate.

Reflections on Commonwealth Virtual Schools

The virtual schools statute, G.L. c. 71, § 94, enacted in January 2013, defines Commonwealth Virtual Schools as public schools operated by a board of trustees where teachers primarily teach from a remote location using the Internet or other computer-based methods and where students are not required to be located at the physical premises of the school. The virtual schools statute authorized the Board to adopt regulations and, through the Department, oversee the establishment and operation of publicly funded, high quality virtual schools in the Commonwealth.

As of this writing, no particular model of virtual schooling in the United States has been an unqualified success. Blended and virtual learning are increasingly becoming part of traditional public schools in the Commonwealth. Over time, this evolution may reduce overall demand for a full-time virtual option.

Research in this area, while still new, indicates that the effectiveness of virtual learning is decidedly mixed. The National Study of Online Charter Schools released in October 2015⁹ studied the academic performance of online charter schools¹⁰ in 18 states. Volume III of the study conducted by the Center for Research on Education Outcomes (CREDO) at Stanford University concludes that the majority of online charter students had far weaker academic growth in both mathematics and reading compared to their traditional public school peers.¹¹ In addition, the study notes that current oversight policies may not be sufficient to ensure that online schools provide positive outcomes for all students. Our experiences with GCVS and TECCA are consistent with this finding.

Consequently, I am not confident that the existing system is sufficient to provide virtual school options in Massachusetts that are high quality. Summarized below are what I see as limitations to the existing law. I also identify some of the current work underway nationally to develop virtual schools that are successful and of high quality.

1. School Governance

By definition, virtual schools are not limited to enrolling students who reside in communities that are geographically proximal to a school's sponsoring board. As a result, virtual schools are de facto statewide institutions. Virtual school boards are essentially local entities. Local entities are not well positioned to oversee and manage what is essentially a statewide school.

- a. Accountability limitations.** Current state law restricts the application for a certificate to operate a CMVS to school districts and education collaboratives through the 2013-19 school years. Chapter 379 of the Acts of 2012, § 8. The law deems a CMVS to be a state agency under G.L. c. 268A, the conflict of interest law, and its board members are public employees under G.L. c. 268B, the financial disclosure law. G.L. c.71, § 94(d). This means that if a board member of

⁹ <http://www.mathematica-mpr.com/news/online-charter-schools-struggle-to-engage-their-students>

¹⁰ Commonwealth Virtual Schools in Massachusetts are not charter schools, though the virtual schools statute sets up an authorizing structure that is analogous to that of charter schools.

¹¹ <http://credo.stanford.edu/news/10-27-2015>

an education collaborative or a superintendent of a district that establishes a CMVS wishes to sit on the board of the virtual school, their participation in key decisions of the CMVS may be limited. This creates a disincentive for a district or a collaborative to use the CMVS model to serve students outside of the district or collaborative region.

- b. **Capacity limitations.** When a board of trustees is granted a certificate to operate a CMVS, they become a public agent authorized by the Commonwealth to supervise and manage the school, which by definition enrolls students from across the state. Given this context, I am concerned regarding the capacity of an all-volunteer, part-time board of trustees to effectively oversee the complex enterprise that is a statewide CMVS. The tasks of a board of trustees include negotiating contracts with education management organizations to manage the day-to-day operations of the CMVS and exercising sufficient oversight to hold those organizations accountable for results. Some states contract directly with education management organizations to operate full-time virtual schools, and some contract with providers of online courses. In both cases, states have greater direct oversight and retain the ability to intervene quickly should either model fail to demonstrate positive outcomes.
- c. To date, the two Massachusetts virtual schools have turned to the few available operators nationally that have the experience and infrastructure to constitute and run a virtual school. Both in Massachusetts as well as nationally, there is concern about the failure of these few operators to realize high-performing programs.

2. Student Enrollment

Current law requires that not less than 5 percent of the students enrolled in a CMVS reside in the school district(s) that established the school. G.L. c.71, § 94(c). A statewide CMVS established in a smaller community, such as Greenfield, puts the school's future at risk if the school cannot enroll that number of students. A special legislative provision enacted for GCVS permitted the school to enroll only 2 percent of its students from Greenfield through the school's first certificate; that provision will expire on June 30, 2016. Effective July 1, 2016, GCVS must enroll a minimum of 5 percent of its students from Greenfield. GCVS currently enrolls 2.7 percent of its students from Greenfield. Eliminating this enrollment requirement will not affect surrounding communities negatively because the law allows a school committee to vote to restrict enrollment if the total enrollment of students in virtual schools who reside in the district exceeds 1 percent of the district's total enrollment. G.L. c.71, § 94(t).

3. Funding

The virtual school statute, at G.L. c.71, § 94(k), specifies that the default tuition rate for a student enrolled in a CVMS is the school choice tuition rate. The Board, in consultation with the Operational Services Division, may approve a higher rate. See G.L. c. 71, § 94(k); 603 CMR 52.07(1). The Board approved a per pupil tuition amount of \$6,700 for both GCVS and TECCA based on an analysis of per-pupil funding rates nationally (in contrast to the \$5,000 per student school choice tuition rates.) The educational model employed by many virtual schools nationally relies on less teacher contact time, more

independent study, and significantly more parent involvement than in Massachusetts. In Massachusetts, a CMVS has substantially higher student-teacher ratios¹² and substantially lower teacher salaries¹³ than state averages. Using statewide teacher salary data from Colorado and Pennsylvania, an adequacy study by the International Association for K-12 Online Learning (iNACOL) in March 2015 found that the cost of a full-time online school is between 93% and 98% of a traditional school cost.¹⁴

While examining the relative costs of online schools and traditional schooling has many variables, both GCVS and TECCA report serving student populations with atypical needs as compared to students enrolled in traditional school districts and in charter schools. In granting a certificate to operate a virtual school, the virtual schools statute requires the Board to give preference to proposals that include an educational program or a specialized focus that appropriately addresses students with unique needs.¹⁵ G.L. c. 71, § 94(c). As a consequence, GCVS and TECCA have placed a priority on recruiting and retaining educators who possess the specialized knowledge and skill to work with these student populations. To that end, both schools are requesting to raise their per pupil expenditures to bring them more in line with those needs. These proposals are currently under review.

In conclusion, I recommend that the Board renew the certificate for the Massachusetts Virtual Academy at Greenfield Commonwealth Virtual School (GCVS) for an additional three years and extend probation with additional conditions placed on the school's certificate. I look forward to further discussions with the Board regarding how to ensure that the Commonwealth's virtual schools can provide students the same high quality education expected of all public schools in Massachusetts.

¹² In FY2015 GCVS, had a student-teacher ratio of 47.2 to 1, and TECCA's student-teacher ratio was 30.7 to 1. The state average was 13.3 to 1.

¹³ In FY2016, the average teacher salary at GCVS is \$44,600, and the average teacher salary at TECCA is \$48,274. The state average is \$71,690.

¹⁴ <http://www.inacol.org/wp-content/uploads/2015/03/iNACOL-Performance-Based-Funding-and-Online-Learning.pdf>

¹⁵ G.L. c.71, §94(c), states that the Board shall give preference to proposals that include an educational program or specialized focus that appropriately addresses 1 or more of the following: students with physical or other challenges that make it difficult for them to physically attend a school; students with medical needs requiring a home or hospital setting; students with unusual needs requiring a flexible schedule; students who are over-age for their grade; students who have been expelled; students who have dropped out; students at risk of dropping out; students who are pregnant or have a child; students with social and emotional challenges that make it difficult for them to physically attend a school; students who feel bullied or cannot attend school because the students' safety is at risk; gifted and talented students; students who seek academic work not available in their school; students in rural communities; and students in institutionalized settings. The board shall also consider whether proposed schools will create or enhance the opportunity for students to attend virtual schools in all grades from kindergarten through grade 12.

If you have any questions regarding this recommendation or require additional information, please contact Kenneth Klau, Director, Office of Digital Learning (781-338-3505); Cliff Chuang, Associate Commissioner (781-338-3222); or me.

Attachments:

Motion

Attachment A: Summary of Review

Attachment B: June 18, 2013 Memorandum to the Board

Attachment C: Comments from the Public

Attachment D: Terms of Certificate