*****Massachusetts Department of***

***Elementary and Secondary Education***

### 75 Pleasant Street, Malden, Massachusetts 02148-4906 Telephone: (781) 338-3000TTY: N.E.T. Relay 1-800-439-2370

| Jeffrey C. Riley*Commissioner* |  |
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# MEMORANDUM

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| **To:** | Members of the Board of Elementary and Secondary Education |
| **From:**  | Jeffrey C. Riley, Commissioner |
| **Date:**  | March 15, 2019 |
| **Subject:** | Commonwealth of Massachusetts Virtual Schools – Renewal Recommendation for Greenfield Commonwealth Virtual School |

Pursuant to the virtual school statute, G.L. c. 71, § 94(j), and the regulations for Commonwealth of Massachusetts Virtual Schools (CMVS) at 603 CMR 52.11, I recommend that the Board of Elementary and Secondary Education (Board) renew the certificate for Greenfield Commonwealth Virtual School (GCVS) for an additional three years, the minimum permitted by statute. I further recommend that the Board remove probation from the school’s certificate and continue conditions[[1]](#footnote-1) on the school’s certificate to address concerns related to: academic results, the school’s academic program, and issues related to access and equity for all students. The rationale for these recommendations is provided in this memorandum.

The Department of Elementary and Secondary Education (Department) evaluated the performance of GCVS against the Commonwealth Virtual School Performance Criteria[[2]](#footnote-2) using quantitative and qualitative evidence reported by the school and collected by the Department throughout the school’s second certificate term, 2016-2017 through 2018-2019. The evidence included, but was not limited to, state academic assessment data, the school’s goals in its Accountability Plan, annual reports, audited financial information, and data collected from accountability reviews conducted in February 2017 and December 2017. Furthermore, GCVS underwent a comprehensive renewal process that included the submission of an application in June 2018 and an inspection visit in October 2018 (see Attachment A). My recommendation is the culmination of this process.

| **Greenfield Commonwealth Virtual School** |
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| **Year opened:** | July 1, 2013 | **Year(s) renewed:** | 2016 (with probationary conditions) |
| **Educational management organization:** | None (former contract with K12, Inc., terminated in October 2017) | **Location of administrative offices:** | 238 Main Street,3rd Floor Greenfield, MA 01301 |
| **Maximum enrollment** | 750 | **Current enrollment:** | 590 as of October 1, 2018 |
| **Grade span:** | K-12 | **Number of sending districts served:** | 168 as of October 1, 2018 |
| **Number of instructional days per year:** | 180 | **Students waitlisted:** | 0 as of October 1, 2018 |
| **Mission statement:** The Greenfield Commonwealth Virtual School, a public school of choice, serves students from across Massachusetts who need a learning community that is accessible and flexible. We give our students and their families choices in what, how, when, and where they learn. As a pioneer of online personalized learning, we empower our educators to tailor learning experiences to each student’s strengths, interests, and challenges. We redefine and change how students and teachers engage through innovative technology, while ensuring mastery of competencies embedded in a rigorous curriculum. |

**School History**

The Massachusetts Virtual Academy of Greenfield (MAVA) opened in 2010 under the innovation school law. See G.L. c. 71, § 92 (innovation schools). 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 for GCVS to operate a CMVS upon submission of a timely application that addressed the information specified in G.L. c. 71, § 94.

The Department received an application from Greenfield on April 22, 2013, to establish a new CMVS beginning in the 2013-2014 school year. 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. To assist GCVS in meeting the high standards expected of a CMVS, the Commissioner recommended, and the Board approved, several conditions be placed on its operating certificate, with each of these items subject to the review and approval of the Department.[[3]](#footnote-3)

During the school’s first certificate term, in June 2014 and March 2015, the Department conducted accountability reviews of GCVS in accordance with 603 CMR 52.08(2). During the review in June 2014, the Department noted concerns regarding governance, the academic program, and academic results. Pursuant to 603 CMR 52.12(2), the Commissioner recommended, and the Board voted in October 2014, to place GCVS on probation with conditions for the remainder of the school's certificate term.

In February 2016, the Board renewed the school’s certificate for a three-year period from July 1, 2016, through June 30, 2019, with a maximum enrollment of 750 students in grades K through 12. Further, pursuant to 603 CMR 52.12(2), the Board extended the school’s probation and directed it to meet specified terms of probation, as recommended by the Commissioner. The probationary conditions related to governance, enrollment, MCAS participation rates, and required the school to demonstrate significant and sustained academic improvement by 2017.

The school applied for amendments to its certificate on June 30, 2017. The Board approved these amendments on October 19, 2017, granting the termination of GCVS’s management contract with K12, Inc. The amendments allowed the school to adopt the Canvas learning management system by Instructure, Inc.; to adopt new curricula, including EngageNY for K-5, English language arts [ELA] and mathematics and Florida Virtual Schools Global (FLVS) for grades 6-12, all subjects; and to hire 10 additional staff members. In January 2018, the Commissioner approved amendments requested by GCVS for its mission statement, the board’s bylaws, and the school’s accountability plan.

At its meeting on March 27, 2018, pursuant to 603 CMR 52.12(2), the Board extended the school’s probationary status, maintained the prior probationary conditions, and added a new condition related to the provision of services for English learners. The Acting Commissioner recommended this action in his [memorandum to the Board dated March 16, 2018,](http://www.doe.mass.edu/bese/docs/fy2018/2018-03/item7.html) based on evidence collected during accountability reviews in February and December 2017.

**Progress Toward Meeting Conditions**

As noted above, GCVS has been on probation since October 2014. In February 2016 and again in March 2018, the Board has extended probationary status and modified the conditions on the school’s certificate. The five conditions imposed in March 2018 and the progress GCVS has made toward meeting those conditions follows. As summarized below, GCVS met most of these conditions with one notable exception: Greenfield Commonwealth Virtual School has failed to show significant academic improvement in mathematics and English language arts.

**Condition 1a:** Reporting Requirements. Greenfield Commonwealth Virtual School must continue to submit to the Department, at odl@doe.mass.edu, board meeting agendas and materials prior to each board meeting at the same time that these items are sent to the school’s board members. Further, the school must submit to the Department the minutes of these proceedings as soon as the school’s 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. The school must provide such additional information within two business days.

**Status: Ongoing**

Greenfield Commonwealth Virtual School continues to provide board meeting agendas, board materials, board meeting minutes, as well as financial statements to the Department.

**Condition 1b:** Greenfield Commonwealth Virtual School must continue to submit to the Department weekly student enrollment reports.

**Status: Ongoing**

Greenfield Commonwealth Virtual School has provided weekly enrollment reports to the Department.

**Condition 2:** Greenfield Commonwealth Virtual School must continue to maintain 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.

**Status: Ongoing**

Greenfield Commonwealth Virtual School maintains a separate escrow account. The school’s February 2019 financial documents show that $101,432.71 is currently held in escrow.

**Condition 3:** Greenfield Commonwealth Virtual School must continue to enroll a maximum of 750 students.

**Status: Ongoing**

As of March 1, 2019, GCVS enrolls 589 students.

**Condition 4:** By December 31, 2018, 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 nonrenewal or revoking the school’s charter at end of the term on June 30, 2019.

**Status: Not Met**

Since its inception, GCVS has not demonstrated academic success. While GCVS has not met this measure, its academic results are similar to those of the other Commonwealth of Massachusetts Virtual School, TEC Connections Academy Virtual School. Please see my reflections below in my recommendation regarding the academic results of the Commonwealth’s two virtual schools.

In 2014, GCVS was in 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 was in the 8th percentile; in 2016, the school was again placed at the 7th percentile. In 2017, due to first administration of the Next-Generation MCAS tests, no school administering those assessments received a percentile.

In 2018, significant changes were made to the statewide accountability system. Beginning in 2018, all Massachusetts districts and schools with sufficient data were classified into one of two accountability categories: districts and schools requiring assistance or intervention or districts and schools without required assistance or intervention. Greenfield Commonwealth Virtual School did not have sufficient data to calculate growth percentiles for high school grades in 2018; therefore, the school did not receive an accountability percentile in 2018. Greenfield Commonwealth Virtual School did have sufficient data for an overall classification in 2018 and was classified as “requiring assistance or intervention” due to its low graduation rate and low participation rates.

In terms of performance on the Next-Generation MCAS in grades 3-8, GCVS scores lag behind statewide averages and show a slight decline from 2017 to 2018.

| **Next-Generation MCAS Tests** |
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| **Grade and Subject** | **2017** | **2018** |
| **Percent of Students Meeting or Exceeding Expectations** | **Avg. Scaled Score** | **Percent of Students Meeting or Exceeding Expectations** | **Avg. Scaled Score** |
| **School** | **State** | **School** | **State** | **School** | **State** | **School** | **State** |
| **Grades 3-8 English Language Arts** | 29 | 49 | 489 | 499 | 26 | 51 | 489 | 500 |
| **Grades 3-8 Mathematics** | 20 | 48 | 483 | 499 | 19 | 48 | 482 | 498 |

Similarly, GCVS student performance on the legacy MCAS lags behind statewide averages in nearly every category and grade level. These scores also show a decline in every subject area, except for English language arts, since 2015.

| **Composite Performance Index[[4]](#footnote-4)** |
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| **Grade and Subject** | **2015** | **2016** | **2017** | **2018** |
| **School** | **State** | **School** | **State** | **School** | **State** | **School** | **State** |
| **Grade 5 Science and Tech/Eng** | 72.5 | 78.2 | 61.0 | 76.4 | 62.8 | 75.3 | 54.1 | 76.5 |
| **Grade 8 Science and Tech/ Eng** | 64.4 | 72.4 | 56.0 | 71.3 | 60.7 | 70.6 | 54.5 | 68.3 |
| **Grade 10 English Language Arts** | 93.2 | 96.7 | 100 | 96.7 | 96.2 | 96.5 | 95.6 | 96.2 |
| **Grade 10 Mathematics** | 80.7  |  89.9 |  80.6 | 89.7  | 81.8  | 89.9  |  77.6 |  89.5 |
| **Grade 10 Science** |  - |  88.2 |  90.0 | 89.0  |  86.8 |  89.4 |  60.5 | 89.3  |

Greenfield Commonwealth Virtual School has demonstrated low to moderate median student growth percentiles (SGP) during the past two assessment cycles.

| **Student Growth Percentile** |
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| **Grade and Subject** | **PARCC** | **Next-Generation MCAS** |
| **Transitional SGP** | **Median SGP** | **Average SGP** |
| **2015** | **2016** | **2017** | **2018** |
| **Grades 3-8 English Language Arts** | 40.0  | 41.5 | 37.0  |  43.2 |
| **Grades 3-8 Mathematics** | 45.0  | 35.0 | 31.5  |  42.9 |
| **Grade and Subject** | **MCAS** |
| **Median SGP** | **Average SGP** |
| **2015** | **2016** | **2017** | **2018** |
| **Grade 10 English Language Arts** | -  |  59.5 | 35.0  |  47.2 |
| **Grade 10 Mathematics** |  - |  47.0 |  34.0 | 33.4  |

Greenfield Commonwealth Virtual School continues to have difficulty meeting the state’s 95 percent threshold required for assessment participation; in 2014, 2015, 2016, and 2018, it did not meet this threshold for subgroups and for subjects.

**Condition 5:** By April 30, 2018, GCVS must submit to the Department for its approval, at sedmond@doe.mass.edu or 75 Pleasant St., Malden, MA, 02148, in a format prescribed by the Office of Language Acquisition and Academic Achievement, a detailed plan for serving students who are English learners. The plan, which must be implemented upon approval, must provide descriptions and timelines for:

1. Identifying and screening all students potentially eligible for English learner services;
2. Providing high-quality, specialized instructional support to English learners, including standards-aligned curriculum, formative assessments, and pedagogical strategies;
3. Providing all teachers of English learners with ongoing professional development to effectively meet the needs of English learners and their parents/guardians;
4. Providing on-demand translation services to current and prospective students' parents/guardians who do not speak English; and
5. Conducting outreach to prospective students' parents/guardians who do not speak English, in multiple languages, using the same channels the school uses for English-speaking parents, which may include web/social media, radio, print, and television.

**Status: Met, with concerns noted**

The school submitted a plan by the date requested. The plan required revision and input from Department staff and, after multiple updates, was finalized in February 2019. As noted in the Summary of Review, the school was in the initial stages of implementing its plan to identify and screen potential English learners (ELs) in October. In its SIMS submission on October 1, 2018, GCVS reported the enrollment of one EL student. According to the school’s updated plan to serve ELs, however, GCVS had identified 136 students in the fall of 2018 in need of screening, some of whom were newly enrolled and some of whom enrolled over four years earlier. Of the 136 students identified via home language surveys, GCVS assessed 58 students and 31 students were found in need of English as a Second Language (ESL) instruction. Currently, the school employs two part-time ESL teachers.

**Renewal of Certificate**

A summary of the performance record of GCVS is provided in the attached Summary of Review (Attachment B). Below are the school’s ratings from its Summary of Review.

| **Rating Scale:** |
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|  **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. |

| **Faithfulness to certificate** |
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| 1. **Mission and key design elements:** Is faithful to its mission, implements the key design elements outlined in its certificate, and substantially meets its accountability plan goals.
 | **Partially Meets** |
| 1. **Access and equity:** Ensures program access and equity for all students eligible to attend the school.
 | **Partially Meets** |
| 1. **Compliance:** Compiles a record of compliance with the terms of its certificate and applicable state and federal laws and regulations.
 | **N/A** |
| **Academic and program success** |
| 1. **Student performance:** Consistently meets state student performance standards for academic growth, proficiency, and college and career readiness.
 | **Falls far below** |
| 1. **Program delivery:** Delivers improved academic outcomes and educational success for all students.
 |  |
| * 1. **Curriculum**
 | **Partially Meets** |
| * 1. **Instruction**
 | **Partially Meets** |
| * 1. **Assessment and program evaluation**
 | **Partially Meets** |
| * 1. **Diverse learners**
 | **Partially Meets** |
| 1. **Culture and family engagement:** Supports students’ social and emotional health in a safe and respectful learning environment that engages families.
 | **Meets** |
| **Organizational viability** |
| 1. **Capacity:** Sustains a well-functioning organizational structure and creates a professional working climate for all staff
 | **Partially Meets** |
| 1. **Governance:** Board of Trustees acts as public agents authorized by the state and provides competent governance to ensure success and sustainability.
 | **Meets** |
| 1. **Finance:** Maintains a sound and stable financial condition that operates in a fiscally responsible and publicly accountable manner.
 | **Meets** |

**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 for three years, the minimum period permitted by statute, with conditions. I am not pleased with the outcomes reflected in the summary of review and summarized in this memorandum; the school is not yet providing the results its students deserve. I have carefully weighed the school’s history, the composition of the school’s population, as well as the track record of virtual schools in Massachusetts and nationwide in making my recommendation. My recommendation is based on several factors, as follows.

* Focus group interviews with parents/guardians of GCVS students continue to 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 2018 also indicates that GCVS serves a unique student population. The school enrolls some populations at rates above state averages. During the 2018-2019 school year, 5.9 percent of GCVS students are receiving accommodations through Section 504 plans, above the state average. Additionally, 21.2 percent of GCVS students have Individualized Education Plans (IEPs), also above the state average.[[5]](#footnote-5)
* Greenfield Commonwealth Virtual School has operated independently of its former educational management organization, K12, Inc., since July 2017, less than two years. Additionally, in December 2017, the Board voted to increase the per pupil tuition rate for both Commonwealth of Massachusetts Virtual Schools (CMVS) currently operating. With the vote, effective fiscal year 2019, the per pupil tuition rate for CMVS increased from $6,700 (less $75 per pupil retained by the Department for programmatic administration) to $8,265 per pupil (with $75 per pupil retained by the Department). The school needs additional time to implement its new educational program and leadership structure as well additional time to leverage increased tuition rates in order to produce results.
* As noted above, GCVS’s academic results have not met standards set by the statewide systems of accountability since the school’s inception. Greenfield Commonwealth Virtual School’s performance, however, is similar to that of TECCA. Both schools have struggled to meet the state assessment participation levels required by law, both schools produce results that are well below state averages, and both schools have been identified as performing in the lowest percentile levels across the state. Results of the two Massachusetts virtual schools are similar to the academic results seen in virtual schools nationwide.[[6]](#footnote-6) Greenfield Commonwealth Virtual School has operated under the threat of closure based on academic performance since October 2014, but has not produced any improvement in academic outcomes. Renewing the school’s certificate with conditions gives the GCVS board additional time to demonstrate academic improvement and retains the Board’s ability to impose probation should the school’s performance worsen.

I recommend that the Board renew the school’s certificate and impose the conditions that follow.

1. Reporting Requirements:
	1. Greenfield Commonwealth Virtual School must continue to submit to the Department, at odl@doe.mass.edu, board meeting agendas and materials prior to each board meeting at the same time that these items are sent to the school’s board members. Further, the school must submit to the Department the minutes of these proceedings as soon as the school’s 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. The school must provide such additional information within two business days.
	2. Greenfield Commonwealth Virtual School must continue to submit to the Department weekly student enrollment reports.
2. Greenfield Commonwealth Virtual School may enroll a maximum of 750 students.
3. Beginning April 1, 2019 and monthly thereafter, GCVS shall provide the Department with an update on the implementation of its plan for serving students who are English learners.
4. By June 30, 2019, GCVS must submit to the Department a comprehensive evaluation of the school’s mathematics, English language arts, and science programs. Additionally, the comprehensive evaluation should address instruction, supports for all learners, and the degree to which all students have equitable access to the school’s academic program. Such comprehensive evaluation must be conducted by an external consultant(s) acceptable to and approved in advance by the Department. The evaluation must be informed by disaggregated performance data from the statewide accountability system and aligned with the CMVS Performance Criteria.
5. By July 31, 2019, the school must submit to the Department for approval a comprehensive action plan (action plan) for improving academic performance and addressing other areas for improvement identified by the comprehensive evaluation. Such action plan must include a needs assessment aligned to the 2018 statewide accountability results for GCVS. The action plan must also specify the evidence-based strategies the school will use to improve performance in mathematics, English language arts, and science for all student subgroups. The plan should also include strategies to improve instruction, supports for all learners, and the degree to which all students have equitable access to the school’s academic program. The action plan must set clear and specific implementation benchmarks, with a clear timetable and deadlines for completion of key tasks, sufficient to allow the school's board of trustees and the Department to monitor implementation. The school must provide evidence that it has shared its improvement plan with the school’s community including, but not limited to, students, parents, and staff.
6. By December 31, 2021, the school must demonstrate that it is an academic success by providing evidence that the school has exhibited significant and sustained academic improvement in mathematics, English language arts, and science on the statewide assessment for all student subgroups.

My recommendation is tempered by the caution that, unlike other public school options in the Commonwealth, the CMVS initiative remains an experiment. Nationally, the performance of virtual schools is decidedly mixed. In order to demonstrate that virtual learning can be a viable alternative for the small number of families who exercise this option, I encourage the two current Commonwealth of Massachusetts virtual schools to rigorously reflect on their results, assess areas for improvement, access the expertise of Massachusetts’ Digital Learning Advisory Council, and exercise their autonomy to refine their models.

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 with 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.

If you have any questions regarding this recommendation or require additional information, please contact Alison Bagg, director, Office of Charter Schools and School Redesign (781-338-3218); Cliff Chuang, senior associate commissioner (781-338-3222); or me.

Attachments: Motion

[Attachment A: Renewal Inspection Report](http://www.doe.mass.edu/bese/docs/fy2019/2019-03/item3-attachment-a.docx)

[Attachment B: Summary of Review](http://www.doe.mass.edu/bese/docs/fy2019/2019-03/item3-attachment-b.docx)

[Attachment C: Terms of Certificate](http://www.doe.mass.edu/bese/docs/fy2019/2019-03/item3-attachment-c)

1. Pursuant to 603 CMR 52.12(1), the “Board or Commissioner may impose conditions on a virtual school's certificate for violations of law, failure to improve student achievement, failure to comply with the terms of the virtual school's certificate, or failure to remain viable.” [↑](#footnote-ref-1)
2. The criteria in their entirety may be found at http://www.doe.mass.edu/odl/cmvs/. [↑](#footnote-ref-2)
3. These terms were described in the Commissioner’s memorandum to the Board dated June 18, 2013: <http://www.doe.mass.edu/boe/docs/fy2013/2013-06/item3.html>. [↑](#footnote-ref-3)
4. The Composite Performance Index is a 100-point index that serves as a measure of the extent to which all students are progressing toward proficiency. When all students score Proficient or Advanced on the legacy MCAS assessment, the CPI will be 100. [↑](#footnote-ref-4)
5. 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. [↑](#footnote-ref-5)
6. <https://nepc.colorado.edu/publication/virtual-schools-annual-2018> “Full-Time Virtual and Blended Schools: Enrollment, Student Characteristics, and Performance” [↑](#footnote-ref-6)