*****Massachusetts Department of***

***Elementary and Secondary Education***

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| Jeffrey C. Riley  *Commissioner* |  |

# MEMORANDUM

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| **To:** | Members of the Board of Elementary and Secondary Education |
| **From:** | Jeffrey C. Riley, Commissioner |
| **Date:** | February 14, 2020 |
| **Subject:** | Proposed Amendments to 603 CMR 4.00 Vocational Technical Education Regulations, Phase I – Vote to Approve Proposed Regulations |

In November 2019, the Board of Elementary and Secondary Education (Board) voted to solicit public comment on proposed amendments to the vocational technical education (VTE) regulations, 603 CMR 4.00. The Department of Elementary and Secondary Education (Department) has reviewed the comments and incorporated some of the suggested changes, as outlined in this memo and detailed in the attached summary. I recommend that the Board vote on February 25 to adopt the proposed amendments, including the additional changes.

The Board’s vote on these amendments will conclude Phase I of the proposed VTE regulatory changes. These amendments are designed to address three main objectives: (1) support the creation of new VTE programs and expand access to the full range of programs for students; (2) strengthen program quality; and (3) streamline the vocational educator licensure process and create additional pathways to licensure.

Phase II of the regulatory process will include proposed revisions to admissions criteria and procedures to promote equitable access to VTE for all students. The Department has already begun its engagement with stakeholders and will continue to do so over the next several months as we prepare proposed changes to [this section of the regulations](http://www.doe.mass.edu/lawsregs/603cmr4.html?section=03) later in 2020.

**Overview of Comments Received**

The public comment period began on December 6, 2019 and closed on January 31, 2020. In total, the Department received five comments from:

1. A VTE teacher in Health Assisting;
2. A Quincy School Committee member;
3. The Quincy Public Schools Executive Director of Career Vocational and Technical Education;
4. The Vocational Technical Educator and Headmaster of Edward M. Kennedy Academy for Health Careers; and
5. The Massachusetts Teachers Association (MTA).

The comments from these five individuals and organizations, and the Department’s response, are detailed in the attached summary. Here is a brief overview.

The VTE teacher’s comments supported the proposed changes to streamline licensure requirements, noting challenges for educators in the current licensure and course substitution process. No changes were made to the proposed amendments.

The Quincy School Committee member, Quincy Public Schools Executive Director of Career Vocational and Technical Education, and Vocational Technical Educator and Headmaster of Edward M. Kennedy Academy for Health Careers all voiced a concern about the proposed addition of a requirement that state-approved VTE programs include a minimum of 900 program hours. These commenters were concerned that a blanket 900-hour requirement may be unduly burdensome for schools to provide. VTE programs are often governed by specific program hours requirements that students need to earn their professional license, although hours requirements may vary from program to program.

Given these concerns, and to best prepare students for professional licensure, we have revised the proposed regulation by including the phrase, “or as otherwise specified in the applicable Vocational Technical Education Framework.” Adding this reference to the VTE Frameworks will allow greater flexibility in program requirements, while still positioning students to meet the training-hours expectations of their respective industries and maintaining a statewide standard of comparability.

The MTA provided comments on a range of topics. Most of the MTA’s comments relate to vocational educator licensure, including proposed changes to definitions, communications and literacy skills tests, Individual Professional Development Plans, the ability for Pilot Program teachers to leverage their years in a Pilot Program toward attaining Professional Teacher Status, and streamlining of language. The MTA also suggests delaying the collection and reporting of student waitlist data. As shown in the attached summary document, we have adopted some of the MTA’s proposed changes and have explained why we declined to adopt others.

At the February 25, 2020 Board meeting, Department staff will be available to answer your questions, including Senior Associate Commissioner Cliff Chuang and staff from the Office for College, Career and Technical Education; Office of Educator Licensure; and the Legal Office.

Enclosures:603 CMR 4.00 – Summary of Public Comments Received and Department Response

603 CMR 4.00 – Clean version of regulations incorporating proposed amendments and changes based on public comments

603 CMR 4.00 – Strikethrough version of regulations showing proposed amendments (in redline) and changes based on public comments (in highlight)

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