**

***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:** | December 8, 2020 |
| **Subject:** | Career/Vocational Technical Education (CVTE) Update |

As part of the continued work regarding Career/Vocational Technical Education (CVTE) regulatory changes, the Department of Elementary and Secondary Education has analyzed data, partnered with a research team, and convened stakeholder groups to investigate approaches to increasing equitable access to high-quality vocational technical education in Massachusetts. This memorandum: (1) provides background and a proposed timeline for amending the vocational admissions regulations; (2) provides information about available CVTE data and research; and (3) describes additional equity-focused initiatives led by the Department’s Office of College, Career and Technical Education.

**1. CVTE Admissions Regulations – Background, Timeline, and Stakeholder Engagement**

Background

In [February 2020](https://www.doe.mass.edu/bese/docs/fy2020/2020-02/), the Board of Elementary and Secondary Education approved Phase I of changes to the Vocational Technical Education regulations at 603 CMR 4.00. This comprehensive set of regulatory amendments supports the creation of new vocational programs, strengthens program quality, and streamlines vocational educator licensure. The changes did not address vocational [admissions criteria and procedures](https://www.doe.mass.edu/lawsregs/603cmr4.html?section=03), which the Department determined required further study.

In our Phase II process since February, the Department has been collecting and analyzing admissions and enrollment data, working with researchers, and engaging with stakeholders. Over the past two months, the Board has heard from various organizations and individuals on this issue. The current vocational regulations permit programs to choose from among three options for admissions: (1) first-come first-served; (2) lottery; (3) selective criteria. If a program uses selective criteria, the criteria must “include academic grades, attendance record, discipline/conduct record, recommendations from the sending-school school counselor, and may include a student interview, provided however, that no one criterion exceeds 50% of the total.” 603 CMR 4.03(6)(a)(1). (For easy reference, the text of 603 CMR 4.03(6)(a) is attached.)

Timeline for Amending the Vocational Admissions Regulations (603 CMR 4.03(6))

The Department is exploring several options to determine how best to promote equitable access to vocational education. Barring unforeseen circumstances, I plan to present proposed regulatory amendments to the Board in Spring 2021, following the projected timeline of activities:

* Ongoing: Collect waitlist data from vocational technical education programs (see below).
* Ongoing: Conduct stakeholder engagement with student, parent, community, and advocacy groups; educators; statewide associations; the Vocational Technical Education Advisory Council; and other interested parties to inform the proposed regulatory changes.
* Winter 2021: Update the Board on waitlist data collection and analysis.
* Winter/Spring 2021: Bring proposed regulatory amendments to the Board for initial discussion and a vote to solicit public comment.
* Spring 2021: Review public comments and revise proposed amendments as needed.
* June or Summer 2021: Bring final proposed regulatory amendments to the Board for a vote to adopt.

Vocational Technical Education Advisory Council

On October 26, 2020 and November 30, 2020, Department staff met (virtually) with the Vocational Technical Education (VTE) Advisory Council to discuss vocational admissions. The advisory council is comprised of 20 members who represent a broad range of interests, industries, and demographics across the Commonwealth. The focus for the VTE Advisory Council this year is to provide advice on equitable access to CVTE, the Department’s monitoring and support systems and processes for CVTE programs, as well as program quality and alignment to business and industry. The Advisory Council will continue to meet regularly and its input will be helpful on policy recommendations concerning vocational admissions. Information regarding the council membership and meetings can be found at <https://www.doe.mass.edu/bese/councils/vte.html>.

**2. CVTE Data and Research**

Interactive CVTE Enrollment and Performance Data Tools

To continue to improve vocational technical education in Massachusetts and consistent with Perkins V (the federal vocational technical education statute), the Department is engaged in ongoing discussions about equitable access to selective vocational technical schools, with particular attention to those schools with the strongest student demand for seats. In collaboration with researchers at Vanderbilt University, the Department has developed interactive CVTE data tools that compare student enrollment for several subgroups (including students with disabilities, economically disadvantaged students, students of color, English Learners, and gender) and performance data (attendance, discipline, and 8th grade MCAS score for incoming students) over multiple years to examine trends. This tool will be available in the next several weeks at [Career/Vocational Technical Education Reporting & Data Resources](https://www.doe.mass.edu/ccte/cvte/data/).

These comparative enrollment reports will provide trend data for each vocational school, Gateway Cities in aggregate, and statewide, over the last several years for these subgroups. The interactive reports will include graphs comparing incoming and attending students with incoming and attending students in a school’s anchor municipalities (i.e., the municipalities that represent the largest share of enrolled students), as well as students in the catchment area or region. Vocational technical school leaders and admission teams may use these reports to establish a common understanding of enrollment trends, inform collaboration with regional stakeholders, enhance recruitment and admission strategies, and thus better serve students across the Commonwealth.

New Research on CVTE in Massachusetts

In keeping with the Department’s focus on supporting evidence-based strategies and ongoing research partnerships, the Department partnered with a research team from the American Institutes for Research to study the state’s CVTE system, including associations between participation in CVTE programs and student outcomes, associations between CVTE teacher qualifications and student outcomes and student entry into regional vocational schools. More details can be found in the full report, ***Career and Technical Education and Postsecondary Student Outcomes in Massachusetts: Career Clusters and Student Groups, Teacher Licensure, and Student Entry, October 2020****,* which will be available at the Department’s [Office of Planning and Research report webpage](https://www.doe.mass.edu/research/reports/topic.aspx?topic=College,%20Career,%20and%20Technical%20Education#pagetop).

The Department is reviewing the findings of this study in collaboration with the research team. This work will help shape several aspects of CVTE in the Commonwealth, from proposed regulatory changes regarding student enrollment, recruitment, and admissions, to recruitment and retention of licensed vocational teachers.

CVTE Program Waitlist Data Collection

The Department has undertaken its own data collection effort to better understand which students apply, but do not gain admission, to Chapter 74 CVTE programs. The amended vocational technical education regulations, approved by the Board in February, included a new requirement that vocational programs report their enrollment data to the Department. *See* 603 CMR 4.03(9) (“Vocational technical secondary schools that have more applicants than available seats shall maintain a waitlist for the current school year for eligible students who do not gain admission to the school, and report such data to the Department.”)

The Department conducted multiple rounds of consultation with vocational schools and districts on this inaugural data collection effort, to make it as efficient and informative as possible, particularly given the challenges presented by COVID-19. This resulted in the development of a waitlist data collection template that requests information about who is applying to CVTE programs and who is admitted, including students’ component and overall scores on admissions criteria, applicant eligibility, and admissions and waitlist outcomes for each applicant, if available. The Department required vocational programs and schools to submit this waitlist data by late November and has begun assembling and analyzing the data. I anticipate being able to present some initial information from this waitlist data to the Board in early 2021.

The waitlist data will help to inform our thinking about possible amendments to the vocational admissions regulations. The Department will also use the data to assess the current demand for CVTE programs and make recommendations to the Massachusetts School Building Authority regarding new school construction and renovation projects across the Commonwealth. In addition, the data should help identify districts that may be well positioned to explore new CVTE programs, including through the Chapter 74 Partnership Program (“After Dark”) approval process that expands use of CVTE facilities beyond regular school hours.

**3. Additional Equity-Focused CVTE Initiatives**

Through our Office of College, Career and Technical Education (OCCTE), the Department is leading several other equity-focused CVTE initiatives:

CVTE Partnership “After Dark” programs. “After Dark” programs are unique collaborations between vocational schools with approved vocational programs and traditional high schools, which allow traditional high school students access to CVTE training in nearby vocational facilities through creative scheduling. The students who enroll in After Dark programs typically could not access regular CVTE programs due to limited space, or because they decide to pursue vocational training later in their high school career. The pilot After Dark programs began in fall 2018 with two at Greater Lawrence Technical School in Advanced Manufacturing and Heating, Ventilation, and Air Conditioning (HVAC) and two at Essex North Shore Agricultural and Vocational Technical School in Advanced Manufacturing and Construction Craft Laborers. The Department has approved six additional districts to launch 24 new programs in high demand sectors this school year. These programs are creating new CVTE opportunities for several hundred additional students. Through the use of federal Perkins and state career-technical partnership grant funds, the Department will continue to support the development of these partnerships to expand access to CVTE.

Streamlined and Consolidated Monitoring. In early 2020, the U.S. Department of Education’s Office for Civil Rights (OCR) rescinded guidance that required states to conduct civil rights reviews for vocational programs separately from other federally-required monitoring under the Strengthening Career and Technical Education for the 21st Century Act (also known as Perkins V). OCR required all states to submit revised monitoring plans (known as Methods of Administration, or MOA) for approval. Our OCCTE staff devised a review process that covers the requirements while enhancing efficiencies and streamlining the process for the field. The new merged process is to be implemented in the 2021-2022 school year. OCR has approved our streamlined monitoring plan, which will be a key part of the Department’s system to support districts in promoting equitable access to CVTE programs.

CVTE COVID-Related Reopening Guidelines: The Department worked with the CVTE Reopening Guidance Group in partnership with the Massachusetts Association of Vocational Administrators to develop [CVTE-specific reopening guidelines](https://www.doe.mass.edu/covid19/ccte/cvte-reopening-guide.docx) for operating vocational programs safely during the pandemic. The Department released the guidelines on July 29, 2020 and updated them on August 31, 2020. Our staff are continuing to work with school and district leaders to address issues as they arise.

CVTE Emergency Admissions Guidance: The pandemic prompted a need for innovative approaches to student recruitment, the application process, and admissions procedures for the 2020-2021 school year. The Department collaborated with stakeholders (students, parents, and guidance and admissions staff) to develop guidance and offer best practices from across the Commonwealth, and published the [Chapter 74 CVTE Emergency Admissions Guidance](https://www.doe.mass.edu/covid19/ccte/cvte-emergency-admissions-guide.pdf) on October 7, 2020. The Department is using the input received through the process of drafting this guidance as a springboard for issues that may need to be addressed through the regulatory change process.

Department staff, including Senior Associate Commissioner Cliff Chuang, Associate Commissioner Elizabeth Bennett, and Timothy Moriarty, a Harvard Graduate School of Education doctoral resident with OCCTE, will be at the December meeting to address the Board and answer questions.

**Attachment:** 603 CMR 4.03(6)(a) – Current MA Regulation on Vocational Admissions

**ATTACHMENT A**

**603 CMR 4.03(6)(a) – Current MA Regulation on Vocational Admissions**

(6) **Admission of Students**

(a) Each vocational technical school and comprehensive school which is selective in terms of admission to its secondary vocational technical programs shall develop and implement an admission policy that is consistent with the Department's "*Guidelines for Admission Policies of Vocational Technical Secondary Schools and Comprehensive Secondary Schools*" that are incorporated into 603 CMR 4.00 by reference. The policy must be approved by the Department prior to implementation. The policy shall be published in the Program of Studies and a copy shall be provided to each student applicant and their parent/guardian. The policy must include the following:

1. The criteria to be used in selecting students and the process for application and admission to the school. Each selective vocational technical secondary school in Massachusetts shall use a combination of selection criteria to determine which applicants have an ability to benefit, and therefore be admitted to the school unless the school opts to use first come-first served or a lottery for admissions. The criteria used shall include academic grades, attendance record, discipline/conduct record, recommendations from the sending-school school counselor, and may include a student interview, provided however, that no one criterion exceeds 50% of the total. Resident students who meet the minimum requirements for admission shall be admitted prior to acceptance of any non-resident students seeking the same course of study. Schools shall condition admission on a student having been promoted to the grade that they have been admitted to enter. Schools may condition admission on a student having passed courses in English Language Arts or its equivalent and mathematics for the school year immediately preceding their enrollment in a selective vocational technical school or program;
2. A description of the Exploratory Program;
3. The criteria and process to be used in selecting students for admission to particular vocational technical education programs commonly referred to as vocational technical majors within the selective vocational technical secondary school or comprehensive secondary school; and
4. **A Review Process and an Appeal Process.** A process at the school district level for students and parents/guardians to review and appeal the decision to deny the student admission to the school or program shall be included. The district shall maintain documentation as to the specific admission requirements that were not met, and must provide such documentation to the Department or to the student's parent/guardian upon request.