Summary of Public Comments on Proposed Amendments to Student Learning Time Regulations 603 CMR 27.00

The Massachusetts Department of Elementary and Secondary Education (Department) solicited public comment on amendments to the state’s Student learning Time Regulations from March 5, 2021 to April 23, 2021. A complete list of individuals who submitted comments is included at the end of this document.

This summary is organized in two parts. The first part summarizes comments that generally express support or concern for the amendments. The second part summarizes and responds to comments that propose additional changes.

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| **General Comments** |
| **Support** |
| * Students should be back in school in-person (Blanc, Carrigo-Das, Skolfield, A. Ostrowski, E. Ostrowski, O’Neil, McKiernan, Hettler, Abbott) * DESE should grant waivers sparingly (Carrigo-Das, Skolfield, E. Ostrowski, Morin, McKiernan, Hettler, Abbott) * Apply same urgency to high school timeline (Skolfield, McKiernan, Hettler, Abbott) |
| **Local Authority** |
| * Decisions about return to school should be made by the local level (Parolisi, Malone, Pelletier, Kruger, Linden) |
| **Delay In-Person Implementation** |
| * Wait until Fall to go back to full time, in-person learning to (Cresey-Gross, Hochberg) * Further disruptions for students should be avoided (Cresey-Gross, Hochberg, Bordelon, Johnson, Linden, Westervelt) |
| **Safety Concerns** |
| * In-person learning is not safe (Sha, Hochberg, Walker, Fox, Westervelt, Linden, Parolisi, Marvel) * Prioritize teacher vaccination before implementing in-person (Troiano, Marvel, Wallenstein, Walker) |
| **Timeline** |
| * The timeline is unreasonable (Parolisi, Hochberg, Fox) |
| **Academics** |
| * Should not take Hybrid option away from districts. (Parolisi, Westervelt, Linden) * Suspend MCAS testing this year (Crocker) |

| **Summary of Public Comment – Specific Changes to Regulatory Language** | | |
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| **Current Language** | **Proposed Change** | **Department’s Response** |
| **603 CMR 27.02: Definitions** | | |
| Remote learning shall mean learning that happens outside of the traditional classroom because the student and teacher are separated by distance. Remote learning may include synchronous or asynchronous components, provided that students have opportunities to interact on each school day with teachers, such as through feedback, office hours, and other regularly scheduled individual student interactions. Remote learning may include but is not limited to online learning. | Require live teacher-student interaction so that remote students engage with teachers daily (Redacted) | No further changes to the regulations are necessary because the Department already requires a daily “live check-in” to support students whose families have selected a remote model for the remainder of the school year. To the extent that the comment relates to the manner in which teachers manage live-streamed classes, that is a matter best left to the discretion of teachers and administrators. |

**List of organizations and individuals submitting public comment:**

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| **Organizations** | **Individuals** | |
|  | * Daniela Carrigo-Das (Parent) * Anthony J. Parolisi (President, Haverhill Education Association * Jill Cresey-Gross (Parent) * Sara Sha (Parent) * Lauren Hochberg (Individul) * Sean Walker (Individual) * Barbara Malone (Parent) * Nicola Bordelon, RN (Parent) * Brooke Fox (Teacher) * Karen Skolfield (Parent) * Ann Ostrowski (Parent) * Erik Ostrowski (Parent) * Jessica Johnson (Teacher) * Holly Troiano (Teacher) * Robert Pelletier (Individual) * Jean Marvel (Teacher) * Renee Morin (Parent) * Harvey Wallenstein (Individual) * Bronwyn Crocker (Individual) * Louis J. Kruger (Individual) * Christine McKiernan, MD, FAAP (Chief, Pediatric Intensive Care Baystate Children's Hospital); Joeli Hettler, MD, Chief, Pediatric Emergency Medicine, Baystate Children’s Hospital); Mary-Alice Abbott, MD (Vice Chair, Pediatric Specialties, Baystate Children’s Hospital) * Jennifer O'Neil (Individual) * Lisa M. Westervelt, Esq (Parent) * Aidan Linden (Teacher) * Redacted (Parent) * Marie Moises Blanc (Parent) |  |