Summary of Public Comments on Proposed Amendments to Accountability Regulations (603 CMR 2.00: *Accountability and Assistance for School Districts and Schools*)

**Source:** Correspondence received via email (8), March 22, 2022 – May 27, 2022

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

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| **Organizations** | **Individuals** | |
| * American Federation of Teachers Massachusetts (AFT-MA) * Massachusetts Business Alliance for Education (MBAE) | * Laura Conrad-Laberinto * Angela Ferreira * Rachel Kay | * Judy Meunier * Ben Tobin * Renée Toth |

| **Summary of Comments Received** | **Department’s Response** |
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| The proposed language in the regulations is open-ended. (AFT-MA) | No change. The Department drafted the regulations to allow for flexibility depending on the outcome of DESE’s federal accountability request. |
| The Department should suspend all reported measures and annual performance determinations. (AFT-MA) | No change. Federal law requires DESE to maintain a system of annual meaningful differentiation for all districts and schools, and state law requires the Board of Elementary and Secondary Education to adopt a system for evaluating district and school performance on an annual basis. |
| The accountability system unfairly penalizes districts serving large populations of low-income students and students of color and is a system of punishment, not support. (AFT-MA) | The Department prioritizes direct targeted assistance and grant resources to districts and schools that are identified as most in need of rapid improvement, as well as those on the cusp. |
| Schools and districts identified as requiring assistance by the accountability system remain low performing. (AFT-MA) | No change. The Department continues to support low performing districts and schools, consistent with state law and regulations. To maintain transparency in reporting, DESE publicly reports data on district, school, and student group performance on a variety of measures. |
| The state should report on progress toward accountability targets. Given the impacts on learning caused by the pandemic and the influx of federal dollars and state Student Opportunity Act funding, stakeholders have a right to know more about whether achievement gaps for our highest need students have closed or widened, and about whether schools have made progress in advancing student learning. (MBAE) | No change. The Department intends to report certain accountability measures and maintain its practice of reporting district, school, and student group-level data for each accountability indicator. However, DESE has determined that making district and school level accountability determinations based on overall progress toward accountability targets presents challenges when considering the data needed to establish a baseline. |
| There is no reason to limit public reporting of data when data limitations can be explained by context. All data and reporting of measures should continue as they have annually and be accompanied, if necessary, with an explanation of circumstances that may have impacted them. (MBAE, Tobin) | No change. The Department intends to report certain accountability measures and maintain its practice of reporting district, school, and student group-level data for each accountability indicator. |
| Given challenges of the last two years, it is more important than ever that districts and the state can assess educational progress, especially for students with disabilities and English learners. While the state may change what is done with this information, it remains important to collect it. (Kay) | No change. The proposed amendment does not alter DESE’s data collection requirements. Additionally, DESE intends to maintain its practice of reporting district, school, and student group-level data for each accountability indicator. |
| Removing data and accountability information for schools will prevent students with disabilities from receiving appropriate services. (Ferreira, Meunier) | No change. The Department intends to maintain its practice of reporting district, school, and student group-level data for each accountability indicator. |
| Data helps districts, parents, and stakeholders understand where progress is being made, what strengths and challenges exist, and whether certain student groups (i.e., students with disabilities) are supported effectively. (Conrad-Laberinto, Meunier, Toth) | No change. The Department intends to maintain its practice of reporting district, school, and student group-level data for each accountability indicator. |
| Data informs school districts whether taxpayer funds have been well invested in new programs and COVID recovery efforts. (Meunier) | No change. The Department intends to maintain its practice of reporting district, school, and student group-level data for each accountability indicator. |