Summary of Public Comments on Proposed Changes to the Vocational Technical Education Regulations

# Introduction

The Massachusetts Department of Elementary and Secondary Education (Department) invited public feedback on proposed changes to the state’s Regulations on Vocational Technical Education (603 CMR 4.00) from March 10 to April 18, 2025. During this period, the Department received a total of 1,295[[1]](#footnote-2) responses via email/mail and 782 responses through a dedicated public comment survey tool.

Among the comments submitted through the survey tool, approximately 10% came from individuals representing their school, district, or organization, while approximately 90% were submitted by individuals on their own behalf. The breakdown of comments by role is as follows (respondents were able to select multiple roles):

* 4.3% from district administrators
* 4.0% from members of advocacy organizations
* 59.9% from parents and community members
* 3.6% from school administrators
* 9.8% from students
* 15.9% from teachers
* 18.1% from individuals identifying as “other”

All public comments, with personal data redacted as required, are available upon request.

For the purposes of this summary, the Department has summarized the number of responses for each comment as follows: Some (1-24%), Many (25-49%), Majority (50-74%), or Most (75-100%).

## Weighted Lottery

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| Summary of Comments Received  | Department’s Response  |
| Commenters suggested that while the introduction of a weighted lottery is a step toward equity, the proposed regulations do not go far enough to remove discriminatory barriers, such as attendance, discipline, and student interest. Instead, commenters advocated for a blind, unweighted lottery open to all students who complete eighth grade, arguing this is the only way to ensure fair access to CTE programs for students from protected classes.Commenters argued that the proposed system continues to reinforce exclusion for students from protected classes due to weighted criteria that reflect systemic inequities. Commenters stressed that regional and district CTE schools are public schools and thus any eighth grader who is deemed to be ready for the ninth grade should be eligible to enroll without barriers and that blind admissions lotteries work. *(American Civil Liberties Union [ACLU] of Massachusetts, Ashburnham-Westminster School Committee, Athol-Royalston Regional School District, Black Educators Alliance of Massachusetts, Brockton Interfaith Community, Collaborative Parent Leadership Action Network, Center for Law and Education [CLE], Citizens for Public Schools [CPS], Commonwealth of Massachusetts Office of the Attorney General [Office of the Attorney General], EdLaw Project, Fitchburg Public Schools, Gardner Public Schools, Greater Boston Latino Network [GBLN], Lawyers for Civil Rights [LCR], Massachusetts Action for Justice, Massachusetts Advocates for Children [MAC], Massachusetts Communities Action Network [MCAN], Massachusetts Municipal Association [MMA], MetroWest Legal Services, North Brookfield Public Schools, Oxford Public Schools, Progressive Democrats of Massachusetts [PDM], Social Justice Foundation, Taunton Public Schools, Town of Groveland Select Board, Vocational Education Justice Coalition [VEJC], and some individuals)* | No Change. All interested students will have an opportunity to apply and be entered into the weighted lottery. |
| Commenters suggested that the implementation of a lottery leaves students’ education to chance and undermines merit. They favored a merit-based admissions process with selective criteria that reward students who worked hard to be there. Further commenters suggested students should demonstrate academic readiness before admissions such as by requiring students to have been promoted and passed English and math before admissions. *(Bristol-Plymouth Regional Vocational Technical, Massachusetts Association of Vocational Administrators [MAVA], and some individuals)* | No Change. All interested students will have an opportunity to apply and be entered into the weighted lottery, and the regulations already require students to be eligible for promotion to the grade that they have been admitted to enter. |
| Commenters suggested the lottery does not address other issues, such as supporting the improvement of comprehensive high schools and/or creating more CTE seats to meet the demand. *(Gateway Cities Legislative Caucus, Representative Frank Moran, Representative Jim Hawkins, Representative Christopher M. Markey, Representative Steven Xiarhos, Senator John Keenan, Representative William C. Galvin, Southeastern Regional Vocational Technical, and some individuals)* | No Change. This is outside the scope of the regulations.  |
| Commenters were generally against the lottery and do not believe admission should be based on a lottery – weighted or otherwise. *(Franklin County Technical School, MAVA, Old Colony Regional Vocational Technical High School, Representative Jim Hawkins, Representative William C. Galvin, Representative Steven Xiarhos, Senator Paul R. Feeney, and some individuals)* | No Change. |
| Commenters expressed concern that the lottery system prevents CTE schools from selecting students who are a strong match for their programs, including the ability to identify those who are genuinely interested in attending for the specific offerings the school provides. *(Blackstone Valley Technical High School, Cape Cod Regional Technical High School, Representative Thomas Walsh, Senator Patrick O’Connor, and some individuals)* | Change. DESE is proposing a change to the regulations that would permit CTE schools and programs to use student interest as part of a weighted lottery. |
| Commenters suggested that admissions systems must include attendance and discipline. *(Union Vocational Presidents and some individuals)* | No Change. The proposed regulations allow all students the opportunity to apply while incentivizing attendance and positive behavior. |
| Commenters expressed the view that a lottery turns CTE school admission into a matter of chance, arguing that attending a CTE school is a privilege rather than a right. They suggested that admission should be based on merit, with preference given to those who have earned it, while others have shown they are not deserving. *(some individuals)* | No Change. The proposed policy allows all students the opportunity to apply while incentivizing attendance and positive behavior. Further, DESE recognizes that students may be more positively engaged in a different learning environment.  |
| Commenters suggested that smaller districts may be disadvantaged in the process. *(some individuals)* | No Change. Districts will be able to adopt a policy aligned to the regulations that meets their regional needs.  |
| Commenters suggested that the lottery system may not be suitable for all students and could be unfair to those who are not selected. *(South Shore Vocational Technical High School and some individuals)* | No Change.  |
| Commenters suggested the lottery won’t improve equity and may misplace students. *(Blackstone Valley Technical High School, Cape Cod Regional Technical High School, and some individuals)* | No Change.  |
| Commenters suggested implementation of a lottery negates local control and/or lowers standards. *(Blue Hills Regional Technical School, Massachusetts Association of School Committees [MASC], Springfield Public Schools School Committee, Town of Littleton Office of the Select Board, and some individuals)* | No Change. The proposed amendments to the regulations maintain a level of local control in schools and/or programs with the ability to choose whether or not to run a weighted lottery.  |
| Commenters suggested that the weighted lottery may a negative impact on school quality, students, teachers, and/or programs. *(Diman Regional Vocational Technical High School, Franklin County Technical School, Representative Frank A. Moran, Worcester Regional Chamber of Commerce, and some individuals)* | No Change.  |
| Commenters suggested BESE needs more time to study policy. *(Blue Hills Regional and some individuals)* | No Change. BESE has conducted eight meetings dedicated to this topic over the course of eight months.  |
| Commenters suggested sibling preference should be considered. *(some individuals)* | No Change.  |
| Commenters suggested a CTE school’s capacity to provide services to a student with disabilities should be considered as part of the admissions process. *(some individuals)* | No Change. Civil rights law prohibits public schools, including public CTE schools, from excluding students with disabilities from admission into their programs on the basis of their disabilities.  |
| Commenters argued that, as public schools, CTE schools should be open to all students and not exclude applicants based on factors like attendance or disciplinary history. They emphasized that all public schools should be held to the same standard and noted that young people often make mistakes and should not face lasting consequences that restrict their access to valuable educational opportunities. *(Fitchburg Public Schools, Massachusetts Action for Justice, North Brookfield Public Schools, Pioneer Valley Regional School District, Taunton Public Schools, and some individuals)* | No Change. The proposed regulation allows all interested students to enter the lottery and creates additional opportunities that incentivize attendance and positive behavior. |
| Commenters suggested that using a lottery may deny some students access to quality education. *(Gateway and some individuals)* | No Change. The proposed regulations do not make changes to the number of seats available to students.  |
| Commenters supported the weighted lottery, emphasizing that the current admissions system excludes students from protected and historically marginalized groups, undermining the core purpose of CTE schools. Commenters suggested the weighed lottery was fairer than the current system. *(Gateway Cities Legislative Caucus, Greater Boston Building Trades Unions, and some individuals)* | No Change. |
| Commenters opposed the use of attendance and discipline records, as well as any requirement for students to express additional interest beyond submitting an application. They argued that these elements could disproportionately exclude students from protected classes and create barriers unrelated to academic potential, instead reflecting broader systemic inequities. Requiring students to demonstrate interest—such as by attending an open house—was viewed as an unnecessary obstacle that could limit access for those already facing structural challenges.Commenters concluded that these criteria would unfairly disadvantage the very students that vocational schools are intended to serve, without any evidence that they improve educational outcomes. *(Ashburnham-Westminster School Committee, CLE, CPS, Gardner Public Schools, GBLN, Lawyers for Civil Rights Boston, MCAN, MetroWest Legal Services, Office of the Attorney General, PDM, and some individuals)* | No Change. The proposed regulation allows all interested students to enter the lottery and creates additional opportunities that incentivize attendance and positive behavior.  |
| Commenters suggested that admissions systems must include attendance and discipline. *(Senator Patrick O’Connor and some individuals)* | No Change. The proposal incentivizes attendance and positive behavior. |
| Commenters supported a weighted lottery with more variables, such as student interest and academic performance. *(some individuals)* | Change. DESE is proposing a change to the regulations that would permit CTE schools and programs to use student interest as part of a weighted lottery. |
| Commenters suggested that the proposed changes should apply only to CTE schools and programs that have demonstrated a significant and ongoing gap in the enrollment of underrepresented student populations relative to the demographics of the region they serve. These commenters argued that districts without disproportionality should not be subject to additional requirements. *(Assabet Valley Regional Vocational School District and its school committee, Cape Cod Regional Technical High School, Essex North Shore Agricultural and Technical School, Greater New Bedford Regional Vocational Technical High School, Keefe Regional Technical School, MA Business Alliance for Education [MBAE], MAVA, South Shore Vocational Technical High School, Southeastern Regional School District, Representative Alice Peisch)* | No Change. |
| Commenters suggested that the proposed weighted lottery system changes under 603 CMR 4.03(6)(a)[[2]](#footnote-3) could result in agricultural schools losing money because they must admit in-district students before out-of-district students and could decrease the chances of out-of-district students being admitted. Most student commenters shared their understanding that the proposed regulations would prohibit non-resident students from enrolling, and some students shared their belief that non-resident students would be prohibited from even applying to CTE schools. Some students shared that they were not against the idea of a lottery but oppose a lottery that excludes non-resident students. The commenters shared their understanding that the proposed changes would restrict non-resident enrollment. (*Bristol County Board of Trustees and some individuals)* | No Change. The requirement to admit in-district students first exists in current regulations. Further, there is no prohibition in the regulations against non-resident students applying to career technical schools.The current regulations at 603 CMR 4.03(6)(a) state: “Resident students who meet the minimum requirements for admission shall be admitted prior to acceptance of any non-resident students seeking the same program.” The proposed regulatory changes leave this language untouched.The current regulations at 603 CMR 4.03(6)(b) outline the process for non-resident students to apply to schools. The proposed regulations do not change this. |
| Commenters suggested that the proposed weighted lottery changes under 603 CMR 4.03(6)(d) could decrease the likelihood that students who may be better at hands-on learning are admitted. Commenters noted that students who struggle with coursework and receive low grades in middle school benefit from hands-on learning. *(some individuals)* | No Change. The proposed weighted lottery eliminates grades as a barrier to career technical school admission. In this way, students who struggled with grades have an increased likelihood, not a decreased likelihood, of admission to a CTE program.  |
| Commenters suggested that the proposed weighted lottery changes under 603 CMR 4.03(6)(d) could decrease the likelihood that students with strong middle school academic records are admitted to CTE programs. *(some individuals)* | No Change. Using middle school academic grades to screen out students overlooks the fact that some students who struggled with traditional classroom work in middle school do indeed thrive in CTE. Some students indicated that they had poor grades in middle school, but since enrolling in their career technical school, their grades improved dramatically because the learning model better matches their interests.  |
| Commenters suggested that the proposed weighted lottery changes under 603 CMR 4.03(6)(d) could negatively impact the reputations of CTE schools and programs. *(some individuals)* | No Change. DESE is confident that career technical schools and programs are well-positioned to educate all students and to set them up for success in their chosen career paths.  |
| Commenters opposed the adoption of the proposed weighted lottery and its related changes under 603 CMR 4.03(6)(b) because it could increase the number of students with disabilities and these students would be unable to participate in career technical programs in the same way as students without disabilities. *(some individuals)* | No Change. Civil rights law prohibits public schools, including public CTE schools, from excluding students with disabilities from admission into their programs on the basis of their disabilities.  |
| Commenters suggested agricultural vocational schools should be exempt from the proposed weighted lottery system and its related changes under 603 CMR 4.03(6)(b) because their programs are unique, the workforce needs are real, and it is important for their students to demonstrate interest in these careers. One student suggested that agricultural schools could set aside seats for non-residents and allow additional weight in a lottery for student interest. Some students noted that other Massachusetts public schools use admission criteria. *(some individuals)* | Change. DESE is proposing a change to the regulations that would permit CTE schools and programs to use student interest as part of a weighted lottery. |
| Commenters raised concern that the draft regulations may not clearly apply to admissions into specific CTE programs within technical education schools, which could create compliance issues under state and federal law. Commenters noted that the language referring to “technical education schools and programs at comprehensive high schools” could be misinterpreted to exclude program-level admissions within CTE schools. They emphasized that this would depart from longstanding Massachusetts policy and violate federal civil rights requirements, which apply to vocational *programs* wherever they are offered. *(VEJC, Center for Law and Education, and some individuals)* | No Change. As in the past, enrollment at the program level in CTE schools will continue to be evaluated as part of the Massachusetts Methods of Administration State Plan monitoring process (MOA), which includes monitoring under the federal Perkins Act. |

## Attendance

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| Summary of Comments Received  | Department’s Response  |
| Commenters suggested students would not be employable if they missed 27 days of school, so they should not be allowed to attend a CTE school. *(Assabet Valley Regional Technical/Vocational School District and its school committee, and some individuals)* | No Change. The proposal incentivizes attendance. |
| Commenters suggested that attendance should affect student acceptance, emphasizing its importance for success in a CTE setting. Commenters argued that a student’s attendance record reflects their readiness for the structure, responsibility, and expectations of a CTE program. Commenters emphasized that the structure of technical instruction makes consistent attendance critical noting that students who miss shop sessions often fall behind quickly, and instructors may lack the capacity to reteach missed hands-on content. *(Blackstone Valley Technical High School, Blue Hills Regional Technical School, Bristol-Plymouth Regional Vocational Technical, Cape Cod Regional Technical High School, Essex North Shore Agricultural and Technical High School, Franklin County Technical School, Gateway, MASC, Old Colony Regional Vocational High School, South Shore Vocational Technical High School, Southeastern Regional Vocational Technical, Worcester Technical High School, and some individuals)* | No Change. The proposal incentivizes attendance. |
| Commenters acknowledged the complexity of attendance data, noting that poor records can result from both personal choice and circumstances outside a student’s control. Some emphasized that hands-on learning may improve attendance for students who struggle in traditional academic settings, suggesting that while attendance should be considered, it should be weighed alongside other factors to ensure fairness. *(some individuals)* | No Change.  |
| Commenters suggested the proposed changes under 603 CMR 4.03(6)(d) could result in students being unable to graduate. They expressed concern that granting students with positive attendance records increased weight in a lottery—rather than prohibiting students who were chronically absent (i.e., missed at least 10% of days enrolled regardless of the reason for the absence) in middle school from entering the lottery—could result in students being unable to meet the attendance demands of a CTE program. They warned this may ultimately prevent those students from graduating, as consistent attendance is essential to meeting the academic and technical demands of such an education. *(some individuals)* | No Change. Some students wrote letters indicating they struggled with attendance in middle school because they were not happy or engaged, but they have been far more motivated to attend a career technical program because it is a different learning model, and their attendance has improved. Some students also shared their school’s policy for missing program “shop hours,” which permits students to make up missed time.  |
| Commenters suggested that students from protected classes have higher rates of unexcused absences due to systemic barriers and factors outside their control, such as poverty, language barriers, U.S. Immigration and Customs Enforcement (ICE) enforcement activity, unstable housing, caregiving responsibilities, transportation barriers, limited healthcare access, or trauma. They argued that exclusion based on these absences is unjust and that the solution to absenteeism should be support, not denial of opportunity.Commenters stated that penalizing students who reach the 27-day unexcused absence threshold would disproportionately harm low-income students, English learners, students of color, immigrant families, and those with limited healthcare or transportation access and violate the intent of equitable access to vocational education. In addition to equity concerns, commenters raised legal and data transparency issues. They noted that the Every Student Succeeds Act (ESSA) requires states to report disaggregated attendance data yet DESE currently reports data annually—not on the proposed 18-month cycle. Without public, disaggregated data showing the distribution of unexcused absences beyond the proposed threshold, commenters argued, it is impossible to evaluate whether the policy would have discriminatory effects, as required under federal law.Commenters also stated that current admissions practices disadvantage students by using 9th-grade performance to determine access to vocational programs in later years. They urged DESE to revise the regulations to address the root causes of absenteeism through supportive interventions, rather than restricting access to educational opportunity. *(CPS, MetroWest Legal Services, Massachusetts Action for Justice, LCR, MAC, MCAN, North Brookfield Public Schools, Office of the Attorney General, Oxford Public Schools, PDM, Pioneer Valley Regional School District, and VEJC)* | No Change. |

## Discipline

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| Summary of Comments Received  | Department’s Response  |
| Commenters suggested students with disciplinary issues should not be in CTE programs, arguing that this disciplinary history would make them unemployable candidates for a trade and could pose risks to the safety and integrity of CTE training environments. *(some individuals)* | No change was made in relation to this comment, but please see below regarding proposed changes to the discipline provision.  |
| Commenters suggested students with disciplinary records pose a safety risk in CTE settings and warned that allowing them into programs with hazardous tools and equipment could lead to serious harm. *(Blackstone Valley Technical High School, Blue Hills Regional Technical School, Cape Cod Regional Technical High School, Franklin County Technical School, MAVA, MASC, South Shore Vocational Technical High School, and some individuals).* | No change was made in relation to this comment, but please see below regarding proposed changes to the discipline provision.  |
| Commenters suggested 11–13-year-old students should be held accountable for their actions and cautioned against admissions policies that would allow students with disciplinary records into CTE programs without consequence. *(Southeastern Regional Vocational Technical and some individuals)* | No change was made in relation to this comment, but please see below regarding proposed changes to the discipline provision.  |
| Commenters argued that middle school disciplinary records are not a reliable measure of a student’s future potential. They emphasized that a single incident should not define a student’s character or growth, and relying on such records could unfairly disadvantage students who have learned from past mistakes. Some also noted that discipline is not applied consistently, especially for students with unique learning needs or those experiencing trauma. They pointed out that students who struggle with attendance or behavior in traditional settings may thrive in hands-on learning environments that better match their learning styles, leading to improved engagement and conduct. (Ashburnham-Westminster School Committee, Essex North Shore Agricultural and Technical High School, Gardner Public Schools, MetroWest Legal Services, and some individuals) | Change. DESE is proposing additional changes to the discipline criteria. The additional changes give a lottery weight to students who have not been suspended or expelled over the 270 days prior to the date of their application, provided that no data prior to an applicant’s seventh grade year is considered, pursuant to offenses described in state law relating to assault and possession of dangerous weapons (G.L. c. 71, § 37H and H½), and for which a court has officially found the student guilty or the student admitted guilt in court. Additionally, it would remove from consideration suspensions and expulsions under a separate state law that is broader in scope (G.L. c. 71, §37H¾). |
| Commenters suggested disciplinary records are often improperly recorded and shouldn’t be a means of selection. They emphasized that disciplinary records frequently lack context, are inconsistently applied, and may reflect systemic issues such as bullying or misinterpretation of student behavior. Several commenters advocated for allowing students to explain the circumstances surrounding discipline and for considering these records only within a broader, more personalized admissions process, including interviews or discussions of lessons learned. *(some individuals)* | Change. DESE is proposing additional changes to the discipline criteria. The additional changes give a lottery weight to students who have not been suspended or expelled over the 270 days prior to the date of their application, provided that no data prior to an applicant’s seventh grade year is considered, pursuant to offenses described in state law relating to assault and possession of dangerous weapons (G.L. c. 71, § 37H and H½), and for which a court has officially found the student guilty or the student admitted guilt in court. Additionally, it would remove from consideration suspensions and expulsions under a separate state law that is broader in scope (G.L. c. 71, §37H¾). |
| Commenters strongly opposed the use of disciplinary history in admissions decisions, citing research and data at both the state and national levels indicating that such practices reinforce systemic inequities and disproportionately harm students of color, students with disabilities, low-income students, and immigrant families. Several commenters objected to the inclusion of disciplinary records under M.G.L. c.71 §§ 37H, 37H½, and 37H¾, particularly when involving nonviolent offenses or unproven accusations. Others argued that using disciplinary data acts as a proxy for discrimination against high-needs students and contradicts the goals of equity in public education. Collectively, commenters called for the removal of discipline as a factor in admissions, advocating instead for holistic approaches that recognize growth, resilience, and character development. *(ACLU of Massachusetts, Citizens for Juvenile Justice [CfJJ], CPS, GBLN, MAC, MetroWest Legal Services, MCAN, North Brookfield Public Schools, Pioneer Valley Regional School District, and some individuals)* | Change. DESE is proposing additional changes to the discipline criteria. The additional changes give a lottery weight to students who have not been suspended or expelled over the 270 days prior to the date of their application, provided that no data prior to an applicant’s seventh grade year is considered, pursuant to offenses described in state law relating to assault and possession of dangerous weapons (G.L. c. 71, § 37H and H½), and for which a court has officially found the student guilty or the student admitted guilt in court. Additionally, it would remove from consideration suspensions and expulsions under a separate state law that is broader in scope (G.L. c. 71, §37H¾). |
| Commenters opposed the use of disciplinary history in admissions decisions, stating that the proposed definition of student discipline is overly broad and may result in students being penalized for minor, subjective infractions. Commenters expressed concern that the proposed regulations allow for an advantage for students without major disciplinary infractions but fail to clearly define what constitutes such infractions. They noted that the inclusion of behaviors like classroom disruption, cellphone use, or wearing earbuds—when applied through M.G.L. c. 71 § 37H¾—can quickly accumulate into 10-day suspensions, particularly affecting students of color and students with disabilities whom studies indicate are disproportionately disciplined for minor conduct. Commenters also noted that the draft regulations do not specify a time limit on how far back schools may consider disciplinary incidents, which could unfairly disadvantage students for outdated behavior—even as far back as elementary school—regardless of subsequent growth or support received.They recommended that the weight associated with discipline be removed entirely. If retained, they suggested strict limitations: restricting consideration to only the two most recent school years, excluding incidents under § 37H¾, limiting inclusion under § 37H to only the most serious offenses, and only allowing § 37H½ to be considered when tied to adjudicated felonies or formal admissions of guilt in court.  *(Office of the Attorney General and Oxford Public Schools)* | Change. DESE is proposing additional changes to the discipline criteria. The additional changes give a lottery weight to students who have not been suspended or expelled over the 270 days prior to the date of their application, provided that no data prior to an applicant’s seventh grade year is considered, pursuant to offenses described in state law relating to assault and possession of dangerous weapons (G.L. c. 71, § 37H and H½), and for which a court has officially found the student guilty or the student admitted guilt in court. Additionally, it would remove from consideration suspensions and expulsions under a separate state law that is broader in scope (G.L. c. 71, §37H¾). |
| Commenters suggested students with serious discipline violations and/or repeat offenders should be excluded from CTE admissions. They argued that such students pose safety risks and could take seats from those who are genuinely committed to learning a trade. Commenters cited behaviors such as staff assault, possession of weapons or controlled substances, and formal felony accusations as grounds for exclusion, noting that “these are all reasons to remove a student from any educational setting—why should it not prohibit them from admission to a vocational school?” *(some individuals)* | No change was made in relation to this comment, but please see above regarding proposed changes to the discipline provision. |
| Commenters suggested student disciplinary records should be considered but not exclude students from participating in the lottery. One commenter stated, “students who possess disciplinary records, to any extent, should not be able to enter a lottery by chance. They should automatically go into a pool that requires further evaluation,” while others emphasized that a record “should be reviewed for the reasons action was taken” and that “grades and disciplinary record should be discussed but not necessarily used to screen a potential student.” *(some individuals)* | No change was made in relation to this comment, but please see above regarding proposed changes to the discipline provision. |
| Commenters suggested discipline records should be considered in a merit-based admission process, not in a lottery. (some individuals) | No change was made in relation to this comment, but please see above regarding proposed changes to the discipline provision. |
| Commenters suggested student disciplinary records should be a selective criterion, but not as currently proposed. One commenter expressed concern about allowing students with a “pattern of aggressive, dangerous or reckless behaviors (but do not fall under 37H, H½, or have not cumulated in more than 10 days under H¾)” to access CTE programs, citing safety risks “both for their own safety and the safety of others.” *(some individuals)* | No change was made in relation to this comment, but please see above regarding proposed changes to the discipline provision.  |
| Commenters supported the use of disciplinary records for admissions decisions. *(Old Colony Regional Vocational High School, Representative Lindsay Sabadosa, and* *some individuals)* | No Change.  |
| Commenters emphasized that student applicants should align with the CTE school’s values and demonstrate qualities such as discipline, motivation, maturity, and self-control. They argued that admission should take into account a student’s character and behavior, especially due to safety considerations in CTE environments and the importance of upholding the school’s reputation. *(some individuals)* | No change was made in relation to this comment, but please see above regarding proposed changes to the discipline provision.  |
| Commenters argued that students with disciplinary records should not be admitted to CTE schools over those who have demonstrated good behavior and strong work ethic. They expressed concern that admitting students with a history of misconduct could be seen as rewarding poor behavior and would be unfair to students whom they believe have worked harder to earn their place. Some also warned that including students with disciplinary issues could negatively impact the overall culture and dynamic of the student body and compromise safety and fairness. *(Bristol-Plymouth Regional Vocational Technical and some individuals)* | No change was made in relation to this comment, but please see above regarding proposed changes to the discipline provision.  |
| Commenters suggested traditional public schools cannot discriminate, so CTE schools must also accept all students. They argued that “public schools don't have a choice if they can keep a child with discipline issues, neither should trade schools” and emphasized that “traditional public schools are not allowed to exclude students based on disciplinary record so it is unfair that vocational schools are given this leeway.” Others noted that disciplinary issues may stem from academic struggles and that “providing a hands-on technical education may provide them what they need and give them incentive to self regulate.” *(Massachusetts Action for Justice and**some individuals)* | Change. DESE is proposing additional changes to the discipline criteria. The additional changes give a lottery weight to students who have not been suspended or expelled over the 270 days prior to the date of their application, provided that no data prior to an applicant’s seventh grade year is considered, pursuant to offenses described in state law relating to assault and possession of dangerous weapons (G.L. c. 71, § 37H and H½), and for which a court has officially found the student guilty or the student admitted guilt in court. Additionally, it would remove from consideration suspensions and expulsions under a separate state law that is broader in scope (G.L. c. 71, §37H¾). |

## Student Interest

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| Summary of Comments Received  | Department’s Response  |
| Commenters suggested that both awareness and interest be considered in admission decisions and they advocated for a more rigorous demonstration of student interest beyond attending events. *(MAVA and some individuals).* | Change. DESE is proposing two additional changes to the regulations: (1) provided that the CTE school or program holds at least two in-person information sessions and two virtual information sessions, an indication of student awareness may be part of an application; and (2) CTE schools and programs may use student interest as part of the weighted lottery system, where the criterion is not scored.  |
| Commenters suggested that the open house requirements are new financial burdens to career technical school districts. *(Worcester Technical High School and some individuals)* | Change. DESE is proposing to change the wording in 603 CMR 4.03 (6)(c) to “two in-person information sessions” rather than “two open houses” |
| Commenters suggested that a lottery does not account for student interest. *(some individuals)* | Change. DESE is proposing that CTE schools and programs may use student interest as part of the weighted lottery system, where the criterion is not scored. |
| Commenters suggested that student interest should be measured or scored in the admissions process. *(MASC)* | Change. DESE is proposing that CTE schools and programs may use student interest as part of the weighted lottery system where the criterion is not scored. |
| Commenters suggested that student interest should be a weighted criterion. *(Essex North Shore Agricultural and Technical High School and some individuals)* | Change. DESE is proposing that CTE schools and programs may use student interest as part of the weighted lottery system where the criterion is not scored. |
| Commenters suggested that interviews are critical to admissions. *(some individuals)* | Change. DESE is proposing that CTE schools and programs may use a non-evaluative interview as a measure of student interest as part of the weighted lottery system where the criterion is not scored. |
| Commenters supported the proposed regulations allowing students to express interest in CTE through multiple options but recommended additional safeguards to prevent unintended barriers. To ensure accessibility and equity, they recommended that the expression of interest options include a short answer question on the application form itself—making it easier for all students to participate. Additionally, they urged that the regulations clarify that the content of the student's expression of interest cannot and should not be used for evaluative purposes or influence admission decisions, in order to protect students whose communication abilities may be affected by English learner status, learning disabilities, or other factors, and help ensure that all applicants are considered equitably. *(Office of the Attorney General)* | Change. DESE is proposing that CTE schools and programs may use student interest as part of the weighted lottery system where the criterion is not scored. |
| Commenters suggested that applying for admission is a sufficient and valid expression of interest. They expressed concern that requiring additional steps—such as attending an event or completing an activity—creates unnecessary barriers that may discourage or exclude students from protected classes. One commenter noted that “not all eighth graders or their parents will be able to take the additional step… and if they don’t, the vocational school can bar them from the lottery.” While they acknowledged that optional interest-related activities may be helpful for student awareness, they emphasized that participation in such activities should not be a condition for eligibility. (Blue Hills Regional Technical School, CPS, Massachusetts Action for Justice, LCR, MCAN, and VEJC) | No change was made in relation to this comment, but please see above regarding proposed changes to the student interest provision. |
| Commenters suggested the proposed weighted lottery under 603 CMR 4.03(6)(c) should consider students’ interest in CTE education. For example, a student interview is a helpful way for students to share their passion for vocational learning. Student commenters perceived that the proposed regulations might prohibit the use of student interviews, as well as other ways students may demonstrate their interest in vocational education *(Bristol-Plymouth Regional Vocational Technical, Cape Cod Regional Technical High School, Franklin County Technical School, South Shore Vocational Technical High School, Southeastern Regional Vocational Technical, and some individuals).* | Change. DESE is proposing that CTE schools and programs may use student interest as part of the weighted lottery system where the criterion is not scored. |
| Commenters suggested the proposed regulations under 603 CMR 4.03(6)(c) should differentiate between demonstrations of student interest versus attendance at an information session. Some student commenters shared their belief that attending a mandatory information session is fundamentally different from explaining your interests and passions to a school during an interview, essay, or other medium. *(some individuals)* | Change. DESE is proposing two additional changes to the regulations: (1) provided that the CTE school or program holds at least two in-person information sessions and two virtual information sessions, an indication of student awareness may be part of an application; and (2) CTE schools and programs may use student interest as part of the weighted lottery system, where the criterion is not scored. |

## Admissions Timeline

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| Summary of Comments Received  | Department’s Response  |
| Commenters supported the common timeline or supported it with conditions. *(Blackstone Valley Technical High School, Franklin County Technical School, Gateway, Southeastern Regional Vocational Technical, and some individuals)* | No Change.  |
| Commenters did not support the proposed common timeline stating that it would create complexity, devalue current practices, and/or would be difficult to implement. (*many* individuals) | No Change. The timeline creates consistency and clarity for students and families. DESE will develop guidance to support the implementation of the timeline.  |
| Commenters suggested the admissions timeline should be a local decision. (MAVA, some individuals) | No Change. The timeline creates continuity and clarity for students and families. |
| Commenters suggested not enough information to answer the proposed common timeline concerns and suggested more clarity about the proposed timeline is needed. (some individuals) | No Change. DESE will develop guidance to support the implementation of the timeline. |
| Commenters suggested one-size-fits-all timeline is problematic and opposed rigid, state-imposed deadlines and lottery requirements. (Blue Hills Regional Technical School, MAVA, Worcester Technical High School, and some individuals) | No Change.  |

## Middle School Policy

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| Summary of Comments Received  | Department’s Response  |
| Commenters suggested the amendments create an unfair burden on middle schools. *(Blue Hills Regional Technical School, Worcester Technical High School, and some individuals)* | No Change. The regulations help to ensure students know all their options for high school, including CTE options, which is a key factor of planning for high school that takes place in all middle schools. |
| Commenters suggested concerns about the amendment’s impact on CTE school resources to provide tours and complete presentations. (*South Shore Regional School District and some individuals*) | No Change.  |
| Commenters suggested strengthening rules ensuring vocational programs have meaningful access to middle school students, including tours, presentations, and direct communications. One commenter suggested there should be a requirement that every school provide this information to all eighth graders. Other commenters suggested formal penalties if middle schools block vocational school access. *(Blackstone Valley Technical High School, Cape Cod Regional Technical High School, Franklin County Technical School, Gateway, MAVA, and some individuals)* | Change. DESE is proposing an additional change requiring all districts to sign an annual attestation that the Middle School Pathway Exploration Policy is implemented.  |
| Commenters opposed the changes because they felt they were not developmentally appropriate for middle school. (some individuals) | No Change. DESE will develop guidance to support implementation. |
| Commenters supported the middle school exploration policy amendments and the ability for all middle school students to learn about the programs offered at CTE schools. (*Southeastern Regional Vocational Technical,* *VEJC, Senator John Keenan, and* *some individuals)* | No Change.  |
| Commenters suggested middle school policies should be enforced by the state. (*some individuals*) | No Change. DESE will inform middle schools of their responsibility to adhere to the proposed regulations and provide guidance. |
| Commenters supported efforts to strengthen the Middle School Pathway Exploration requirements and offered specific recommendations to improve clarity, equity, and implementation. Commenters welcomed DESE’s move to formalize middle school access policies and suggested consolidating related regulatory sections for clarity. They recommended setting timelines for student tours and information sessions, requiring sending districts to share primary language data, and including language to ensure that access policies address language and disability-related barriers. They also proposed requiring school committee approval of these policies and adding an annual attestation process to support oversight and accountability. *(South Shore Regional Technical)* | No Change. |

## Modernizing Language

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| Summary of Comments Received  | Department’s Response  |
| Commenters supported the language change to “career technical.” *(Cape Cod Regional Technical High School, Franklin County Technical School, Gateway, South Shore Vocational Technical High School, and some individuals)* | No Change.  |
| Commenters indicated that “vocational” has a different meaning than “career technical.” Commenters opposed replacing the term “vocational” with “career technical,” arguing that “vocational” is better understood by students, families, and employers and more clearly conveys hands-on, occupation-specific training. They expressed concern that the change could cause confusion, disrupt recognition, and result in unnecessary costs, urging the Board to retain the existing terminology. (Blackstone Valley Technical High School, Blue Hills Regional Technical School, and Essex North Shore Agricultural and Technical High School, MAVA) | No Change. Career and Technical Education is the term recognized nationally to describe programs that prepare students with a combination of technical knowledge and specialized skills, including agricultural programs.  |
| Commenters supported language change as long as it doesn't affect funding. (some individuals) | No Change.  |
| Commenters proposed alternative definitions for “resident student,” “sending district,” “sending school,” and revising definitions for “weighted lottery,” “state-designated programs,” and “waitlist.” *(MAVA)* | No Change. |
| Commenters suggested alternative terminology to “career technical education,” such as “career technical and agricultural education.” *(some individuals)* | No Change. Career and Technical Education is the term recognized nationally to describe programs that prepare students with a combination of technical knowledge and specialized skills, including agricultural programs.  |

## General

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| Summary of Comments Received  | Department’s Response  |
| Commenters suggested admission policies should be a locally controlled issue. *(Tri-County Regional Vocational Technical High School and Town of Littleton Office of the Select Board)* | No Change.  |
| Commenters suggested forming a task force with teachers, administrators, and the public. (Blue Hills Regional Technical School, MAVA, and some individuals) | No Change. The public has had an opportunity to weigh in through public comment and at BESE meetings. Additionally, the established Career Technical Education (CTE) Advisory Council advises the Board and the Commissioner on matters related to CTE across the Commonwealth. |
| Commenters submitted a form letter via email. This letter suggests that the lottery will please students in programs they do not have the “aptitude nor interest” in. It suggests the lottery will decrease outcomes for CTE school students and may threaten industry and employer investment in programs if changes go into place. It suggests, alternatively, creating more programs to meet demand, increasing middle school exploratory and support for applying to underrepresented students, increasing transportation, and working with individual schools. (some individuals) | No Change.  |
| Commenters suggested areas in procedural fairness and data accuracy citing sending schools should be required to provide discipline and attendance records to vocational schools, require only completed applications be considered for purposes of the waitlist, and require DESE to verify data accuracy before releasing it or using it for compliance actions. (*MAVA)* | No Change. |

1. Approximately 800 of these responses were some version of a form letter. [↑](#footnote-ref-2)
2. All citations refer to the proposed regulations available at <https://www.doe.mass.edu/bese/regs-comments/default.html> unless otherwise stated. [↑](#footnote-ref-3)