Summary of Public Comments on Proposed Changes to the Competency Determination Regulations

# Introduction

The Massachusetts Department of Elementary and Secondary Education (Department) invited public feedback on proposed changes to the state’s Regulations on MCAS and Competency Determination (603 CMR 30.00) from February 26 to April 4, 2025. During this period, the Department received a total of 26 comments via email and 146 comments through a dedicated public comment survey tool. Redacted versions of all survey responses and emails are available upon request.

Among the 146 comments submitted through the survey tool, 26 came from individuals representing their school, district, or organization, while 120 were submitted by individuals on their own behalf. The breakdown of comments by role is as follows (respondents were able to select multiple roles):

* 4.8% from district administrators
* 11.0% from members of advocacy organizations
* 50.0% from parents and community members
* 3.4% from school administrators
* 0.7% from students
* 43.2% from teachers
* 23.3% from individuals identifying as “other”

All 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%).

# Summary of Public Comment

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| **Summary of Public Comment Themes and Department Response** |  |
| **Public Comment Received** | **Department’s Response** |
| **General** |  |
| **Continue to allow districts to use the MCAS as a part of local graduation requirements.** (No organizations, some individuals) | No changes. This is already allowed as the establishment of local graduation requirements is at the sole discretion of school districts. |
| **Include more guidance on the implementation for students with disabilities and English learners.** (Pittsfield School Committee, Massachusetts Attorneys for Students' Educational Rights, Multistate Association for Bilingual Education, Northeast, Massachusetts Association of Approved Private Schools; many individuals)  | No changes. If the proposed amendments are adopted, DESE plans to issue further guidance. |
| **Include more guidance on the implementation in Career Technical Education (CTE) environments.** (Blue Hills Regional Technical School, some individuals) | No changes. If the proposed amendments are adopted, DESE plans to issue further guidance.  |
| **Significant oversight is needed to ensure that districts will not seek to prematurely graduate students with disabilities and improperly terminate their eligibility for special education services.** (Center for Law and Education, Massachusetts Attorneys for Students' Educational Rights, Federation for Children with Special Needs and Massachusetts Advocates for Children, in conjunction with the statewide Secondary Transition Working Group; some individuals) | No changes. If the proposed amendments are adopted, DESE plans to issue further guidance.  |
| **The regulations currently include a section (30.07) on the rights of students with disabilities; consider including parallel language for English learners.** (Multistate Association for Bilingual Education, Northeast; no individuals) | DESE has added the following language to section 30.07, “Nothing in 603 CMR 30.00 shall be interpreted to limit or expand a student's rights under 603 CMR 14 Education of English Learners Regulations or 603 CMR 31.00 Massachusetts Certificate of Mastery and State Seal of Biliteracy.” |
| **30.02 “Definitions”** |  |
| **Reinstate the definition of Educational Proficiency Plans (EPPs).** (Mass Business Alliance for Education, EdTrust in Massachusetts; some individuals)  | No changes. While districts are free to implement the use of the EPP in their district as a condition for graduation, in the current regulations the use of the EPP as a path towards graduation was based on a qualifying MCAS score. |
| **Include approved special education schools in definition of district.** (Massachusetts Association of Approved Private Schools; no individuals) | No changes. If the proposed amendments are adopted, DESE plans to issue further guidance.  |
| **Remove assessment as an option from definition of “showing mastery” as it creates more high-stakes assessments**. (Massachusetts Teachers Association, South Hadley Education Association; many individuals) | No changes. The definition of “showing mastery” in the proposed amendments includes multiple options for measures to show mastery. |
| **Further define “showing mastery” by including that each course contains at least 80 percent of the standards identified on the relevant curriculum frameworks.** (EdTrust in Massachusetts, Massachusetts High Technology Council, Mass Business Alliance for Education; some individuals) | No changes. If the proposed amendments are adopted, DESE plans to issue further guidance on the certification of curriculum alignment to state standards.  |
| **Provide alternative for students who may be exempt from a final exam.** (Montachusett Regional Vocational Technical School; some individuals) | No changes. The definition of showing mastery already includes an equivalent measure identified in the district’s CD policy.  |
| **Further define “satisfactorily completing coursework” by including a standardized minimum passing grade and/or grade point average.** (Federation for Children with Special Needs and Massachusetts Advocates for Children, in conjunction with the statewide Secondary Transition Working Group, Mass Business Alliance for Education, Massachusetts High Technology Council; some individuals) | No changes. “...earns full credit” is best determined at the local level.  |
| **30.03 “Standards for Competency Determination”** |  |
| **Require MassCore.** (Federation for Children with Special Needs and Massachusetts Advocates for Children, in conjunction with the statewide Secondary Transition Working Group, Massachusetts Attorneys for Students' Educational Rights; some individuals) | No changes. Statutory language only allows us to consider coursework up until grade 10, MassCore covers grades 9-12.  |
| **Include Earth Science/Environmental Science as an option for science.** (No organizations; some individuals) | No changes. The statutory language states “by satisfactorily completing coursework that has been certified by the student’s district as showing mastery of the skills, competencies, and knowledge contained in the state academic standards and curriculum frameworks in the areas measured by the MCAS high school tests described in section one I administered in 2023.” In 2023, the Science MCAS was administered in Biology, Introductory Physics, Chemistry, and Technology/Engineering.  |
| **Include Financial Literacy as an additional area.** (Mass Bankers Association, Financial Empowerment Network; no individuals) | No changes. Financial Literacy is not an “additional area” as outlined in the statutory language.  |
| **Include Algebra II as an option for math.** (No organizations; some individuals) | No changes. If the proposed amendments are adopted, DESE plans to issue guidance covering this topic. |
| **Clarify language to allow for coursework that may occur over more than one year.** (Pittsfield School Committee, Voices for Academic Equity; some individuals) | DESE has added language to further define and clarify coursework to allow for multi-year courses.  |
| **30.04 “District Certification”** |  |
| **Require Department approval of District CD policies.** (Mass Business Alliance for Education; some individuals) | No changes. While the Department will collect, publicize, and potentially audit district CD policies, it will not be the Department's role to approve the policies during this interim period. |
| **30.05 “Audit”** |  |
| **Include more language on specific audit provisions.** (Center for Law and Education, EdTrust in Massachusetts, Mass Business Alliance for Education, Massachusetts Business Roundtable, Massachusetts High Technology Council; some individuals) | No changes. If the proposed amendments are adopted, DESE plans to issue further guidance.  |
| **Additional Question** |  |
| **Include an alternate pathway using MCAS.** (EdTrust in Massachusetts, Massachusetts Business Roundtable, Mass Business Alliance for Education, Associated Industries of Massachusetts, Voices for Academic Equity, Northampton Public Schools, Massachusetts High Technology Council, Federation for Children with Special Needs and Massachusetts Advocates for Children, in conjunction with the statewide Secondary Transition Working Group, Multistate Association for Bilingual Education, Northeast; many individuals) | No changes. A broad and comprehensive use of MCAS as one pathway to earning the Competency Determination would not provide a consistent state-wide standard. Additionally, the approach outlined in the proposed regulations is consistent with the intent of the new statutory language.  |
| **Do not include an alternate pathway using MCAS.** (AFT Massachusetts, Citizens for Public Schools, Massachusetts Teachers Association; many individuals) | No changes. |