# **MEMORANDUM**

|  |  |
| --- | --- |
| **To:** | Members of the Board of Elementary and Secondary Education  |
| **From:**  | Pedro Martinez, Commissioner |
| **Date:**  | October 21, 2025 |
| **Subject:** | Student Records: Proposed Amendments to Regulations on Student Records (Definitions), 603 CMR 23.02  |

This month I am presenting proposed amendments to 603 CMR 23.02, the definition of “transcript” in the Regulations on Student Records, to the Board of Elementary and Secondary Education (Board) for a vote to solicit public comment, anticipating a final vote by the Board in January 2026, following the public comment period.

The Regulations on Student Records address matters relating to parents’ and students’ rights of confidentiality, inspection, amendment, and destruction of student records. In the definition section of the regulations, 603 CMR 23.02, a transcript is defined as follows (emphasis added):

The transcript shall contain administrative records that constitute the minimum data necessary to reflect the student's educational progress and to operate the educational system. These data shall be limited to the name, address, and phone number of the student; his/ her birthdate; name, address, and phone number of the parent or guardian; course titles, grades (or the equivalent when grades are not applicable), course credit, grade level completed, and the year completed, and highest performance level achieved on all MCAS tests **required for the competency determination.**

Following the passage of Question 2 in November 2024, attaining a certain MCAS score is no longer a requirement for the competency determination. As a result, we are proposing a technical change to the definition of “transcript” in the regulations to delete the reference to the competency determination, to conform the definition to state law, as amended. The proposed amendments also include a copy edit for clarity and a reference to state endorsed seals or awards, consistent with the proposed amendment to the Seal of Biliteracy regulations.

Rob Curtin, chief officer for data, assessment, and accountability, will join us for the discussion at the October Board meeting.

With the Board’s approval, the Department will solicit public comment on the proposed amendments. After reviewing all the comments and determining whether further changes are needed, the Department anticipates bringing the amendments back to the Board in January 2026 for final adoption.

A redlined version of the regulations is attached, along with a motion to solicit public comment on the proposed amendments.

Enclosures:

* 603 CMR 23.02 Strikethrough version of relevant portion of regulations showing amendments
* Motion