# Massachusetts Department of Elementary and Secondary Education

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Jeffrey C. Riley
*Commissioner*


**MEMORANDUM**

**To:** Members of the Board of Elementary and Secondary Education
**From:** Jeffrey C. Riley, Commissioner
**Date:** April 19, 2022
**Subject:** Proposed Amendments to Competency Determination Regulations, 603 CMR 30.00: Establishment of New CD Standard for the Classes of 2026–2029; and Proposed Amendments to Certificate of Mastery Regulations, 603 CMR 31.00 (Standards for Students in the Classes of 2026-2029)

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At the meeting of the Board of Elementary and Secondary Education (Board) on April 26, 2022, I will ask your approval to solicit public comment on proposed amendments to the Regulations on MCAS and the Competency Determination (603 CMR 30.00). The proposed amendments would establish a new passing standard for the Competency Determination (CD) for the classes of 2026 through 2029 for English language arts (ELA), mathematics, and science and technology/engineering.

I will also ask for your approval to solicit public comment on proposed amendments to associated regulations for the Certificate of Mastery and State Seal of Biliteracy, 603 CMR 31.00, to include standards for students in the classes of 2026 through 2029.

**Background on the Competency Determination**

The Education Reform Act of 1993 established a new state standard (called the competency determination, or CD) for high school graduation: Students must meet the standards adopted by the Board through regulation and measured by the MCAS in order to be eligible for a Massachusetts high school diploma. The Commonwealth introduced MCAS testing in 1998. Starting with the class of 2003, all graduating students were required to earn the CD by scoring at the *Needs Improvement* level or higher on the grade 10 ELA and mathematics tests.

The Board subsequently raised the standard for the CD. Students since the class of 2010 must either earn a score of 240 (*Proficient*) on the grade 10 ELA and mathematics MCAS tests, or earn a score of 220 (*Needs Improvement*) and meet the course-taking requirements of an Educational Proficiency Plan (EPP). They are also required to earn a score of *Needs Improvement* or higher on a high school science and technology/engineering (STE) tests.

Consistent with the Education Reform Act, the Board has adopted and periodically amended regulations that establish standards for the CD and MCAS appeals. The Department has implemented the program and related policies, including alternate pathways (MCAS-Alt, MCAS appeals) and retest opportunities for students.

**Transition to Next-Generation MCAS Tests**

In November 2015, the Board voted to develop a next-generation MCAS testing program, with the intention of revising and upgrading the assessments to provide clear and accurate signals to students about whether they are on track for work at the next level, and, in high school, for the expectations of colleges, employers, and civic engagement. The transition to next-generation MCAS tests began with the first administration of new tests in grades 3–8 in spring 2017.

The first next-generation grade 10 ELA and mathematics MCAS tests were administered in the spring of 2019, and student results from those tests were reported using the new achievement levels that the Board adopted in spring 2017: *Exceeding Expectations, Meeting Expectations, Partially Meeting Expectations, and Not Meeting Expectations*. To ensure fairness for students seeking to attain their high school competency determination (CD) as we transitioned from the legacy high school MCAS assessments to next-generation assessments, in February 2018 the Board voted to approve amendments to the regulations that established an interim passing standard for the CD for students in the classes of 2021 and 2022, the first two classes to take the next-generation tests in ELA and mathematics. The interim standard on the next-generation tests is defined as a similar level of achievement to the current required standard on the legacy tests: 240 (*Proficient*), or 220 (*Needs Improvement*) and the fulfillment of the requirements of an Educational Proficiency Plan in ELA and mathematics.

In February 2019, the Board voted to amend the regulations to establish an interim passing standard in science and technology/engineering (STE) for students in the classes of 2023 and 2024, and in January 2020 the Board extended the interim passing standard for ELA and mathematics for one additional year to the class of 2023.

In September 2021, in recognition of the unavoidable delays and changes in our plans caused by the pandemic, the Board extended the passing standard again—through the class of 2025—for all three subjects.

**Competency Determination Advisory Committee**

In the winter of 2020, the Department's Office of Student Assessment convened an advisory committee—composed of classroom teachers, educational administrators, policymakers, representatives from higher education, and other stakeholders—to assist me in preparing my recommendation to the Board regarding a new passing standard for the CD. The onset of the COVID-19 pandemic forced suspension of the committee's work; the committee began reconvening in fall 2021 and completed its work in early January 2022.

At the February 15, 2022, meeting of the Board, advisory committee chair Dr. Dana Mohler-Faria reported on the outcome of the committee's work and I presented a proposed timeline for the Board to arrive at a decision regarding a new competency determination (CD) standard for students beyond the class of 2025.

**Rationale for and Summary of Proposed Amendments**

As I discussed with you at the February meeting, the evidence heard by the committee strongly points to the importance of raising the CD standard beyond the current cut scores. This current CD level, which was identified by linking to the 220-equivalent score on the legacy MCAS tests, falls into the lowest possible achievement level on the next-generation MCAS tests—*Not Meeting Expectations*. The committee's review of actual student work found that about 50% of students at the current CD cut score in ELA were not able to earn any points on the ELA essay that was reviewed.

The committee also spent time reviewing the results of ongoing analyses produced by Educational Opportunity in Massachusetts, a research-practice partnership between Brown and Harvard Universities and DESE. (The Board also had an opportunity to see some of the results of this research at its January 2020 meeting.)

The committee heard compelling evidence regarding the correlation between students' MCAS scores and later outcomes in education and the workforce. Among other findings, the research showed that MCAS scores predict later outcomes in education and earnings and that a high percentage of students who score at or near the 220-equivalent on the high school MCAS tests are not well prepared for postsecondary success. For example, only 11% students in the class of 2011 who scored at the current passing standard in mathematics went on to enroll in a four-year college in Massachusetts, and only 5% graduated from a four-year college within seven years.

This evidence points to the importance of raising the CD standard and also highlights the need to articulate clearly to students, parents, educators, and other stakeholders how the different levels of achievement on the MCAS tests—and in particular the CD level—signal whether a student is on track for success beyond high school, either in postsecondary education, the military, the workplace, or independent and productive community life. Raising the CD standard is critical, as is the message that we believe students are capable of meeting the higher standard and the Commonwealth and its educators will support them to do that.

The proposed revisions to the CD regulations would establish the following:

1. Students in the classes of 2026–2029 would be required to earn a scaled score of **486** (the scaled score just beyond the midpoint within the *Partially Meeting Expectations* achievement level category) on the ELA, mathematics, and STE MCAS tests to earn their competency determination in those subjects.
2. Students in the classes of 2026–2029 who earn a scaled score of at least **470** (the lowest scaled score in the *Partially Meeting Expectations* achievement level) would not be required to take an MCAS retest or file an appeal, but they would be required to complete an Educational Proficiency Plan (EPP) in ELA and/or mathematics.
3. Updates to the components of the Educational Proficiency Plan (EPP)
    a. A requirement that the school provide a student's EPP to their parents/guardians on an annual basis
    b. A requirement to describe the tutoring or other individualized academic supports the student will receive

c. The establishment of different expectations for the EPP for students who are actively enrolled and successfully progressing in the Mass Core curriculum, an approved Chapter 74 vocational-technical program, or a designated Early College or Innovation Pathway program

d. Clarifications to the types of courses and assessments required in a student's EPP

e. Clarifications around the expectation for adult learners, students who have exited high school without a CD, seniors who have already completed all their required courses in the relevant subject matter, students who are not continuously enrolled or are enrolled in an alternative program, and students who enroll in senior year

These proposed amendments to the CD regulations (603 CMR 30.00) necessitate corresponding amendments to the associated regulations for the Stanley Z. Koplik Certificate of Mastery Award and the State Seal of Biliteracy (603 CMR 31.00). With the Board's approval, the Department will solicit public comment on the proposed amendments to both sets of regulations. After reviewing any comments that are received and determining whether further changes needed, I plan to bring the proposed amendments back to the Board in June 2022 for final adoption.

A redlined version of both sets of regulations is attached, along with motions to solicit public comment on the proposed amendments. Rob Curtin, Chief Officer for Data, Assessment, and Accountability, Matt Deninger, Chief Strategy and Research Officer, Associate Commissioner Michol Stapel, and Lucy Wall of our legal staff will join us for the discussion on April 26, along with guest presenter John Papay, Associate Professor of Education and Economics at Brown University.

Attachments:

Redlined version of proposed amendments to 603 CMR 30.00 and 603 CMR 31.00
Motions to solicit public comment