

From: noreply@formstack.com
Sent: Wednesday, January 06, 2016 5:04 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 5:03 PM

Name (optional)::

**Company/Organization (if applicable)
(optional)::**

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes:: Building Codes/Accessibility Standards

**Please list the Agency or Agencies
affiliated with this regulation::**

**Describe the regulatory issue or
observation::** retell requirement
This requirement is very confusing and should not be required. If the
state can not provide adequate and free courses then they have no
right to restrict our license!!

**Suggestions for improvements to the
regulation::**

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From: noreply@formstack.com
Sent: Wednesday, January 06, 2016 4:56 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 4:55 PM

Name (optional):: Julie

Company/Organization (if applicable) (optional)::

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation::

The requirement of teachers to develop and track DDM's is a very time consuming example of Red Tape in education. Teachers spend hours and hours developing DDM's, which seem to be not much more than wordy ways of describing what you are teaching and how you are measuring it. In my district the DDM process is very vague and is not really authentic- since we do three different DDMs thought the year and thus don't measure a standard set of skills at the beginning, middle and end of the year. (Instead we measure a small set of skills twice at various times of the year). I don't think administrators can keep up with the process. I have had two binders full of evidence that were barely looked at. Yet I have to keep and collect in case someone decides to try to say I am not effective and I need to prove that I am. I am asked to collaborate with others to create these yet have no common planning time to do so. Honestly, it would be fairly easy to fabricate this data if push came to shove. Seems that every year there is more extraneous paperwork that takes time from actual teaching and truly collaborating with parents and staff. Most teachers whom I know are frustrated by the red tape.

Suggestions for improvements to the regulation::

It is a great idea in theory, but in practice, it just needs to be simplified. If we value teachers giving feedback to others as part of the eval system, we need to find a more simple way to do so and make it clear that this does not mean you collect binders and binders full of "evidence"

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From: [REDACTED] <oreply+de4af3cc6ad7715c@formstack.com>
Sent: Wednesday, January 06, 2016 5:16 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 5:16 PM

Name (optional):: Michael Aw

Company/Organization (if applicable) (optional):: Hopedale Memorial Elementary School

Address (optional):: [REDACTED]

Primary Phone (optional)::

Email (optional):: [REDACTED]

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation:: District Determined Measures (DDMs)

Suggestions for improvements to the regulation::

DDMs are redundant! we have numerous formal and informal assessments and data not to mention high stake tests such as the MCAS or the PARCC to measure student growth, we the educators(who are in the trenches) are wasting valuable teaching/learning time developing artificial/superficial DDMs. We know it, administrators know it and most importantly, our students know that DDMs are not authentic assessments. I am currently observing our Art and Gym teacher administering their DDMs, which means students are yet again taking more "tests" even in non academic setting! One student exclaimed "We can't even relax and enjoy art anymore because we are taking a test in art!" Not every single thing we teach and learn should be tested or measured. Can't we learn for the sake of learning? Have we completely disregarding Howard Gardner's Multiple Intelligence Theory? Didn't Piaget, Bullock, Plowden, Cockroft, Donaldson, and all the brilliant minds determine that children learn at different rates? so, even if you start all the children off together there would soon be wide differences in their abilities and competences? As children differ so do the rates at which each comes to understanding of a problem or achieves quality in creative or expressive work? Here are more recommendations from them:
- Children learn if they are given time... learning through activity and

experience cannot be fitted into neat, administratively convenient teaching and testing.

- Children through their own natural vitality and enthusiasm for understanding the world..
- Children learn through first-hand experience...
- Children learn if they are given opportunity to express themselves, practically and emotionally... Not just some paper/pencil tests!
- Children learn if they are taught in a well-managed, secure and happy classroom...
- Children learn through interaction with others so they will need the opportunity to speak, discuss, share, co-operate, listen, exchange ideas, explain, and help each other... Not taking tests after tests to compete with each other, caring more about grades than learning!
- Children learn if their work is valued... How can we show we value their work if all we do mostly is testing and assessing?

I believe educators should be more concern with students "uncovering" subjects rather than concern with "covering" subjects. DDMs are definitely forcing educators like me to do the latter.

"The curriculum is to be taught in terms of activity and experience rather than knowledge to be acquired and facts to be stored." - Haddow Report on the Primary School 1931

Do we want "good test takers" or "critical thinkers" for our future?

Please include educators in the fields in conversations before writing, creating, mandating new regulations. Just because everyone attended schools doesn't necessarily make someone an education expert. Please respect educators by making them true partners.

Respectfully,

Michael Aw

[REDACTED]

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Sent: Wednesday, January 06, 2016 5:35 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 5:34 PM

Name (optional)::

Company/Organization (if applicable) (optional)::

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation:: District-Determined Measures and Teacher Evaluation System

Suggestions for improvements to the regulation:: Eliminate the DDMs - they are burdensome, not useful, and prevent teachers from focusing on teaching and learning by requiring that we set aside time to assess students, teach them a dedicated topic related to the assessment, and then test them again. It's too much testing. You want somewhere to start trimming back? DDMs would be a wonderful first step.

And the teacher evaluation system. Is it useful to evaluate teachers? Sure. Is it a good idea to have evidence backing up their evaluation? Sure. What is being gained by my demonstrating that I am meeting seven different standards with at least two pieces of evidence per item, plus reflections, plus a student learning goal plus a professional practice goal? And that's just on me as a teacher. That doesn't account for the time my principal has to spend doing drop-in observations on 30 teachers + 30 announced observations + meetings pre and post observations. All time that he could spend being more engaged with children, working with teachers to provide support and guidance, and generally being more visible and present. It's an insane amount of time and regulation, and for no clear, discernible purpose. Roll it all back. Massachusetts teachers deserve better, and more importantly, our students deserve better. Think about what is being compromised or left undone for kids when a teacher has to devote this much wasted time to petty

regulations.

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Sent: Wednesday, January 06, 2016 6:22 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 6:21 PM

Name (optional)::	Jacqui
Company/Organization (if applicable) (optional)::	Methuen Public Schools
Address (optional)::	
Primary Phone (optional)::	
Email (optional)::	[REDACTED]
CMR Number (If known): :	
General Regulatory Themes::	Education
Please list the Agency or Agencies affiliated with this regulation::	
Describe the regulatory issue or observation::	<p>I would like to see the evaluation of educators code get revamped. As an educator, it has set a tone of distrust between teachers and supervisors. With a feeling of distrust, it makes teaching even more stressful than it was. Educators have enough pressure from the state already with the other regulations regarding our curriculum of what and how we teach. I feel that the emphasis needs to be put on training our administrators to be leaders of people instead of policy enforcers. You are doing a grave injustice to our education system with this current evaluation process. Not one educator is opposed to having administrators in our classrooms more often, in fact we welcome it. Most administrators have lost touch with the rigorous demands of a classroom teacher. The biggest hurdle that educators have with this new system is the "evidence" we need to provide that matches the rubric. It's simply ridiculous.</p>
Suggestions for improvements to the regulation::	<p>As an educator, I would love for administrators to come in and observe a variety of different lessons throughout the year. As an elementary teacher, it would be great to have an observation of a ELA lesson, math lesson and then general classroom management/environment. I don't think that saving all my agendas for meetings is helpful to anyone. I don't think that saving testing results from my students means anything. As educators, we know that one or two tests do not define a students' learning. Teachers are not data collectors!!! We are educators that want to help children reach their best potential as learners and as responsible members of the school community. The evidence</p>

collection needs to stop!!!

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Sent: Wednesday, January 06, 2016 6:29 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 6:28 PM

Name (optional):: Joseph Cunha

Company/Organization (if applicable) (optional)::

Address (optional)::

Primary Phone (optional)::

Email (optional):: [REDACTED]

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation:: Teacher evaluation

Suggestions for improvements to the regulation::

1. Remove the requirement for teachers to provide evidence of their work product. If the Evaluators can't tell hat's right or wrong through observation they shouldn't be evaluating teachers. The demand for anything more than a couple of sample lessons is a waste of time and effort on the teachers part whose time can be better spent doing other than creating horse and pony shows of documents. The biggest insult is the process assumes we are guilty of not doing our jobs and we need to prove ourselves innocent.

Also I would increase the evaluation cycle for proficient teachers to 4 years with yearly observations in case of a drop in productivity which would require a shorter evaluation cycle. Why waste administrators time on proficient teachers.

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To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 7:38 PM

Name (optional):: Catherine Tuccinardi

Company/Organization (if applicable) (optional)::

Address (optional):: [REDACTED]

Primary Phone (optional)::

Email (optional):: [REDACTED]

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation:: As a teacher of 11 years, I am increasingly overwhelmed with DESE's requirements. We currently have goals for our DDMs, goes for student learning and professional practice AND professional development goals as well as meeting contractual obligations. Because we are spread so thin, it is very difficult to truly focus on any of these goals. Which set of goals is most important? Why can't we focus on one or two goals and actually make meaningful changes?

Suggestions for improvements to the regulation:: Streamline goals for teachers by tying in licensure renewal with our evaluation system and doing away with the arbitrary and time consuming DDMs. Let teachers focus on actually improving their practice instead of wasting so much time compiling data for all of these different requirements.

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x

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 7:55 PM

Name (optional):: Deb McCarthy

Company/Organization (if applicable) (optional):: Hull Piblic School system

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: Depart,met of Elementart and Secomdary Education

Describe the regulatory issue or observation:: District Determined Measures and Teacher Evaluation Tool

Suggestions for improvements to the regulation::

I write with a sense of urgency and implore you to intervene so that educators can service students first and foremost. Currently the mandates of the paperwork for this incredibly burdensome meaningless system of accountability are coming at the expense of the emotional and social welfare of the students we work with. Mine is a middle of the road district, not wealthy but not Holyoke, however the current demands for my role as a fifth- grade teacher are impossible at best to meet. I have been in the classroom for 21 years and many would attest to my level of expertise and competency. While DESE is talking about growth model scores my students today were on edge, restless, and sought my attention in regards to..... North Korea, Isis, and the threat of a hydrogen bomb. They are 10 year olds. I have a student with severe emotional needs who is simply contained within a regular education classroom because the resources for intervention are non- existent. Rather than provide the critical direct services needed for our students the adults in the building must focus first and foremost on the mandates of this bureaucratic madness. I believe that we are at a crisis mode for some of our behaviorally and emotionally challenged students and instead of providing the necessary interventions and services needed, we triage with maximum effacey. Please intervene and allow teachers to teach and service our children as reams of paperwork will never replace the value of one-to-one

relationships.

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x

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 7:55 PM

Name (optional)::

**Company/Organization (if applicable)
(optional)::**

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes:: Education

**Please list the Agency or Agencies
affiliated with this regulation::** DESE

**Describe the regulatory issue or
observation::** It is my observations that the requirement of DDM's for teacher evaluations is waste of valuable time in the classroom and effort on the part of the educator.

**Suggestions for improvements to the
regulation::** I suggest that DDM's no longer be a requirement for teacher evaluations.

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Sent: Wednesday, January 06, 2016 8:19 PM
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Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 8:18 PM

Name (optional)::

Company/Organization (if applicable) (optional)::

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation:: DDMs are only in existence in MA because we needed an infusion of cash via Race to the Top. DDMs are pointless for teachers, because nearly all students show growth over the course of a unit, so to have teachers administer a test to prove they can teach by showing that kids improve over the course of a month or two is pointless. That class time would be better spent focusing on what the kids may be having difficulties with, so that they have more time to practice their craft.

Suggestions for improvements to the regulation:: Get rid of DDMs; they are pointless and demonstrate nothing about learning. They take up valuable class time and teacher's efforts outside of class.

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To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 7:19 PM

Name (optional):: Rebecca Cusick

Company/Organization (if applicable) (optional)::

Address (optional):: [REDACTED]

Primary Phone (optional):: [REDACTED]

Email (optional):: [REDACTED]

CMR Number (If known): : 603

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation::

1. The educator evaluation system is an unnecessary burden to administrators and teachers. It distracts educators from the important work of teaching with excessive paperwork. It does not enhance the quality of teaching. In addition, DDMs create an additional layer of testing and are not required under the new ESSA.
2. The licensure and recertification process are difficult and expensive for educators. It is overwhelming and burdensome.
3. There are too many unfunded mandates in education, such as fingerprinting, Retell, etc.

Suggestions for improvements to the regulation::

Work with educators to revise. Build in revision mechanisms so when the regulations prove burdensome they can be amended.

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Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 8:40 PM

Name (optional)::

Company/Organization (if applicable) (optional)::

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes::

Education

Please list the Agency or Agencies affiliated with this regulation::

DESE

Describe the regulatory issue or observation::

Suggestions for improvements to the regulation::

Eliminate DDMs from teacher evaluations

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Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/06/16 9:33 PM

Name (optional)::

Company/Organization (if applicable) (optional)::

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): : 603

General Regulatory Themes:: Building Codes/Accessibility Standards

Please list the Agency or Agencies affiliated with this regulation:: Department of Education

Describe the regulatory issue or observation:: District Determined Measures are just one more intrusive tool which add to the already excessive amount of assessments placed on Massachusetts educators. Teachers are being held accountable for more and more non-teaching duties. Regulation after regulation have reduce the amount of creative and autonomous instruction teachers went into teaching for. Assessments need to be reduced across all districts and not added to. Please listen to those of us who work with students every day. A great quote to dwell on is, "Yhose who can teach, those who don't make laws about teaching".

Suggestions for improvements to the regulation:: Do not add DDM's to the already burdensome amount of assessments already interfering with good, productive and necessary instruction.

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From: [REDACTED] <noreply+9f56ce14e3f9583f@formstack.com>
Sent: Thursday, January 07, 2016 7:29 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/07/16 7:29 AM

Name (optional):: Sean Walker

Company/Organization (if applicable) (optional):: Select...

Address (optional):: [REDACTED]

Primary Phone (optional):: [REDACTED]

Email (optional):: [REDACTED]

CMR Number (If known): :

General Regulatory Themes:: Building Codes/Accessibility Standards

Please list the Agency or Agencies affiliated with this regulation:: Department of Education

Describe the regulatory issue or observation:: District Determined measures of teacher effectiveness have proven to be an exercise in frustration for teachers and administrators, while providing no improvement to the quality of education our students receive. They are an unnecessary burden.

Suggestions for improvements to the regulation:: Remove the requirements for DDMs from teacher evaluations.

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From: [REDACTED]noreply+8dcf2c9bacb03bd3@formstack.com>
Sent: Thursday, January 07, 2016 8:47 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/07/16 8:47 AM

Name (optional):: Sarah Carmichael
Company/Organization (if applicable) (optional):: North Reading High School

Address (optional):: 154 Jewett St.
Pepperell, MA 01463

Primary Phone (optional)::

Email (optional):: [REDACTED]

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: Department of Education

Describe the regulatory issue or observation::

Recently the state began requiring the use of District-Determined Measures (DDMs) for assessing students and compiling data to be used as an indicator of student and teacher performance. The DDMs, and the state teacher evaluation system as a whole, are a burdensome waste of time for teachers.

I have been teaching high school English for eighteen years, and as an experienced teacher I know what works and what doesn't in my own practice. When students aren't learning a concept I am teaching, I work to improve the way I deliver information to students. I assess students using multiple measures: tests, group projects, creative writing, essays, etc.. I have the data I need to know how my students are doing through relevant and engaging assignments I have created myself and with my department. This year and last year, I have been asked to give up three days of my own instruction and assessment to give meaningless DDMs that are only related to my curriculum in that they ask the students to read and write. Initially we were told that DDMs could be relevant and teacher-created, but every time we created a meaningful DDM our administration told us that our DDMs had to be PARCC-like so we could track data. Now the state isn't even using PARCC, but instead of giving my students a meaningful, engaging essay for their midyear exam, I still have to give them this PARCC-like DDM so I can track their "growth", as if there would be no other way of doing this.

Instead of getting to know my students in the first week of school, I had to give them a 75 minute "pre-test". Instead of improving my instruction during prep periods and on professional development days, I have to write dry DDM PARCC-like questions and learn how to analyze data (I am an English teacher, mind you). My students in 10th grade have four days of MCAS, plus another three days of standardized testing that I am required to give them. This spring I will have to spend a good deal of time writing a narrative analyzing these DDMs as part of the teacher evaluation process. Please, talk to teachers about this system. It is burdensome and takes the real spirit out of education.

**Suggestions for
improvements to the
regulation::**

Do not require the use of "data" for evaluating teachers. I welcome student, parent, and administrator feedback, classroom observations, portfolios of lesson plans and samples of student work as a means of demonstrating my efficacy as a teacher.

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Sent: Thursday, January 07, 2016 11:29 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/07/16 11:29 AM

Name (optional):: Michael Csorba

Company/Organization (if applicable) (optional):: Massachusetts Teachers Association

Address (optional):: [REDACTED]

Primary Phone (optional):: [REDACTED]

Email (optional):: [REDACTED]

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation::

Describe the regulatory issue or observation::

District Determined Measures are two measures that are used in teacher evaluations. Each teacher needs two numbers to determine student growth, which means that each teacher needs to do two pre-tests and to post-tests. That is four assessments to calculate how much a student has grown. Then all of that data is collected and dissected all to report back to the state whether a teacher has demonstrated "low," "moderate," or "high" growth. That's it. One work will be factored into the whole evaluation for hours and hours of work.

Suggestions for improvements to the regulation::

Please consider removing the mandate of District Determined Measures from teacher evaluations. These assessments are "unnecessary and confusing." While I appreciate the localization of these assessments, they are not a true measure of student growth and their application to teacher evaluations is unfair.

But the most important reason to do away with this mandate is that it takes away more valuable time from instruction and learning. We still have to review and administer all of the MCAS (soon to be MCAS 2.0) exams, and now there are more assessments that take away from our students' learning.

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To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/07/16 1:23 PM

Name (optional):: Maureen O'Connor-Casilli

Company/Organization (if applicable) (optional):: retired teacher, Newton Public Schools

Address (optional):: [REDACTED]

Primary Phone (optional):: [REDACTED]

Email (optional):: [REDACTED]

CMR Number (If known): : Public education -district determined measures

General Regulatory Themes:: Building Codes/Accessibility Standards

Please list the Agency or Agencies affiliated with this regulation::

Describe the regulatory issue or observation::

Suggestions for improvements to the regulation:: eliminate or reduce the number of unnecessary assessments determined by districts which only lead to more time on testing and less on classroom learning.

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Sent: Thursday, January 07, 2016 1:40 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/07/16 1:39 PM

Name (optional)::	Donna
Company/Organization (if applicable) (optional)::	Palmer Public Schools
Address (optional)::	
Primary Phone (optional)::	
Email (optional)::	[REDACTED]
CMR Number (If known): :	
General Regulatory Themes::	Education
Please list the Agency or Agencies affiliated with this regulation::	Dept. of Education Massachusetts Teachers Association
Describe the regulatory issue or observation::	District Determination Measures for educators or DDM's

Suggestions for improvements to the regulation::

District Determined Measures or DM's

Dese continues to micro manage educators with more and more redundant paper work. Teachers and educators are required to full out so many forms, rubrics, lesson plans, updating classroom goals on a daily basis, relearning a new initiative with absolutely zero training and the list can go on forever.....

The DDMs take up so much time for everyone, including administrators who are required to monitor them. There is less time to actually engage in teaching our learners. I personally started out as a school counselor and everything has changed. I rarely have a chance to actually work with students. I used to love my job when I actually had time to work with children.

Mr. Baker please help educators to minimize all the red tape and paper work. We need to focus on working and teaching our learners.

Sometimes I wonder if we even need the Dept. of Education at all? They never fund their mandates. This is wrong on so many levels.

Sincerely

Frustrated Educator

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From: noreply@formstack.com
Sent: Thursday, January 07, 2016 2:17 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/07/16 2:16 PM

Name (optional):: Nancy Bradbury

Company/Organization (if applicable) (optional):: Gateway Regional School

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: Public Schools

Describe the regulatory issue or observation::

I am writing to address "some of the regulations that affect public education are "confusing, unnecessary, inconsistent and redundant" — to quote from Governor Charlie Baker's Executive Order 562: "To Reduce Unnecessary Regulatory Burden".

As an Adjustment Counselor in the Public School System, working with students from 7th to 12th grades, I have significant concerns about the educational regulations. First of all I find the DDM's to be demeaning, redundant, and completely unnecessary. While I agree that it is important to establish career goals, I find the current evaluation is not constructive and does nothing to accomplish the goal of improving professionalism.

In addition, I have not found a correlation to MCAS or PARCC testing to in anyway be an authentic measure of academic ability for our students. Many of the students I work with come from underprivileged homes and the students often have significant learning disabilities and/or social/emotional/behavioral issues. I spend most of my day trying to help our students get to a place where they can concentrate on their academics, but it is difficult when much of our population suffers from various forms of trauma. I state the obvious when I say, These students do not test well.

Suggestions for improvements to the

If we were able to spend more time supporting students with their social/emotional problems through mindfulness and other proven methods,

regulation::

their self esteem, ability to be good citizens and community members, as well as academic abilities and test scores, would improve dramatically. In my opinion, this is where the government should spend their money.

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Sent: Thursday, January 07, 2016 9:41 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/07/16 9:40 PM

Name (optional):: Aaron Udel

Company/Organization (if applicable) (optional):: Wahconah Regional High School

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): :

General Regulatory Themes:: Building Codes/Accessibility Standards

Please list the Agency or Agencies affiliated with this regulation:: Massachusetts Department of Elementary and Secondary Education

Describe the regulatory issue or observation:: District Determined Measures, or DDMs, are used to track data related to student and teacher performance. According to the Quick Reference Guide from DESE's website, using DDMs has allowed districts to create "groundbreaking opportunities to better understand student knowledge and learning patterns across their schools." While the state may envision the "groundbreaking opportunities" created by DDMs, it's clear that the only ground that is breaking is the ground right underneath our feet. DDMs measure specific areas of learning and are hardly comprehensive. The only opportunity they help to create is the opportunity for more testing. Good, competent teachers don't need these measure to tell them if their students are learning, and the fact that bad teachers are required to complete these assessments won't make them into good teachers. It's far too easy to fudge the data of DDMs. They are not a useful diagnostic tool, and they are certainly not beneficial to students.

Suggestions for improvements to the regulation:: Get rid of them and focus energy on providing funding for meaningful professional development that allows teachers to talk about how to teach content.

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From: noreply@formstack.com
Sent: Saturday, January 09, 2016 11:09 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/09/16 11:08 AM

Name (optional)::	Joel Belmonte
Company/Organization (if applicable) (optional)::	Public Education
Address (optional)::	[REDACTED]
Primary Phone (optional)::	
Email (optional)::	
CMR Number (If known): :	
General Regulatory Themes::	Building Codes/Accessibility Standards
Please list the Agency or Agencies affiliated with this regulation::	Public Education. Evaluation of teachers based upon data
Describe the regulatory issue or observation::	District Determined Measures mandated by the state board of education are absolutely ridiculous. It is completely unfair to evaluate a teacher based upon test scores. It is cumbersome, costly, and ineffective on all public school districts. To obtain DDM's students in public school have to take more tests and teachers are teaching to a test. This is not enriching education for the students of our commonwealth and it is more of just "corporate reform" in education. What other profession are you evaluated based upon how someone performs on a test? I've asked college professors, doctors, nurses, lawyers, and even engineers and none of them are evaluated the way teachers are. They all said it's absolutely ludicrous what the federal and state government are doing to public education. There is an absolute agenda behind all the mandates the commissioner and board of education have implemented. They are making education harder than it has to be. We were the number state in education for several years for a reason.
Suggestions for improvements to the regulation::	Stop the testing. More learning less testing.

From: [REDACTED]oreply+503886df5dc1501a@formstack.com>
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Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/11/16 2:55 PM

Name (optional):: Margaret Pash

Company/Organization (if applicable) (optional)::

Address (optional)::

Primary Phone (optional)::

Email (optional):: [REDACTED]

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation::

Mandated testing in general, DDMs (District-Determined Measures) in particular.

The rollout of DDM assessments has been nothing short of chaotic. At the time of implementation no one, from DESE administrators to school administrators, seemed to understand precisely what they were asking of teachers. The current method of administering DDMs is a waste of valuable time for students, teachers and administrators.

Each teacher must devise a given number of assessments that "measure student growth." A pretest must be given, and after the material has been taught, the test must be given again and the results reported to administration as data showing "student growth".

Of course, this simply reinforces a culture in which teaching to the test has become the norm. Further, administrators unfamiliar with the content area can't understand the assessment, and have no idea how to interpret the "data."

Teachers have always used assessments to inform their teaching. When I started teaching in the public schools 18+ years ago teachers were trusted to know how to assess what their students needed to progress in a given discipline. Now it seems that people who spend zero time in the classroom

think they can look at "data" presented in a one-size-fits-no-one template and decide if we know what we are doing.

**Suggestions for
improvements to the
regulation::**

Get rid of the DDMs.

If you are a teacher who needs to reduce your students' assessment results to a data chart, you probably have no business being a teacher in the first place.

If you are the kind of administrator who needs a data chart to know if your teachers are doing a good job, perhaps you, too, should rethink your career. There are far better indicators of good teaching.

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From: [REDACTED] <noreply+7f086c1314904633@formstack.com>
Sent: Thursday, January 14, 2016 6:03 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 01/14/16 6:03 AM

Name (optional):: James Murphy

Company/Organization (if applicable) (optional)::

Address (optional):: 43 Roland St.
Newton, MA 02461

Primary Phone (optional)::

Email (optional):: [REDACTED]

CMR Number (If known): :

General Regulatory Themes:: Education

Please list the Agency or Agencies affiliated with this regulation:: DESE

Describe the regulatory issue or observation:: District-Determined Measures (DDMs); fingerprinting; RETELL, and other hoops for teachers to jump through are both unnecessary and burdensome. DDMs in particular are an absolute mess in terms of what qualifies as one, how they are to be meaningfully incorporated into a teacher's evaluation, and the paperwork potentially involved if a standardized test isn't used as the DDM.

Suggestions for improvements to the regulation:: Get rid of DDMs as part of the evaluation process. The same goes for RETELL and fingerprinting. Both of the latter are simply taxes on teachers, prompted by politicized PR considerations, that serve no real educative or student wellbeing purpose.

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