

From: [REDACTED] <noreply+273dd768e2c34791@formstack.com>
Sent: Friday, June 19, 2015 10:02 AM
To: [REDACTED]
Subject: Regulatory Review

Categories: Red Category



Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 06/19/15 10:01 AM

Name (optional):: Ann Marie Ellis

Company/Organization (if applicable) (optional):: Norwood Public Schools

Address (optional):: [REDACTED]
[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
DOR/DLS
Municipal Government
State Regulations

Describe the regulatory issue or observation:: McKinney-Vento Homeless Reimbursement
Medicare Reimbursement
Technology Education
Proposition 2 1/2

Suggestions for easing regulatory compliance::

McKinney-Vento reimbursement was written to be deposited into the Towns General fund, which is subject to a town/school split. Please change it to be reimbursed directly to the schools for school committee expenditure without further appropriation; as the circuit breaker reimbursement is written. Every little bit of funding that schools can receive directly helps.
It would be great if the Medicare reimbursement was written the same as above as the schools are the providers of the data and reporting and pay for the expense of having it processed third party, while the town receives the funding.
Our students are very competitive and have won many awards for their work in areas of fine arts, history, television, technology, robotics, foreign language, etc. We are very proud of them and wish for these programs to continue; however, given the costs associated with these programs and the cost of the basics of education, and the lack of revenue sources the town can provide it's

inevitable that these programs will suffer cuts. It would be great if the state would create a grant source that educators and administrators could apply for in support of special programs. This state has a great higher education reputation, as well as having many technology and sciences businesses. Why not invest in our students futures and help to develop them for the states corporate needs?

Finally, a repeal or amendment of the proposition 2 1/2 is necessary. Municipalities who are successful at override are only "band-aiding" the problem, and will have to do so again in future years. There has not been an adjustment to the maximum tax rate since inception in 1980!!!! Just look at the increase in cost of living, consumer price index, or the rate of inflation. A dollar in 1980 would now cost approximately \$2.85.

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[REDACTED]

From: [REDACTED] <noreply+ac5f752d435bd976@formstack.com>
Sent: Saturday, June 20, 2015 3:47 PM
To: [REDACTED]
Subject: Regulatory Review

Categories: Red Category



Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 06/20/15 3:46 PM

Name (optional):: Glenn Koocher

Company/Organization (if applicable) (optional):: MA Association of School Committees

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:: Department of Elementary and Secondary Education

Describe the regulatory issue or observation::

It is unclear to the public education community if DESE considers itself subject to the governor's executive order. Further, it is unclear whether regulation reform can be enacted unless the state examines the abuses below the regulatory level including "advisories," "Opinions," "Opinion Letters," "telephone interpretations and directives" issued by department staff with our without authorization from superiors, and other instructions.

Also, the state might consider if over 1,000 pages of official material related to educator evaluation alone is appropriate.

Suggestions for easing regulatory compliance::

Forbid the issuance of any regulations from DESE without the expressed review of not only the executive branch, but also the legislative branch which may, or may not have authorized such overreaching.

Establish a working group to identify the historic excesses and abuses from DESE and prevent agencies from perpetuating themselves by creating directives that simply keep them busy or creating ipso-facto a reason for them to exist.

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From: noreply@formstack.com
Sent: Wednesday, July 08, 2015 11:37 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Categories: Red Category



Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/08/15 11:37 AM

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:: contracted child care providers and CCR&R's EEC

Describe the regulatory issue or observation:: Self Employed families and the amount of paperwork required to obtain subsidized child care. It is enormous and families then have to show their tax returns for the year to compare the income amounts and ensure they were actually eligible. Many many families end up ineligible and have to repay the state.

Suggestions for easing regulatory compliance:: I am not sure but there needs to be easier forms clearly spelled out for families who are self employed or who are independent contractors. Also there needs to be very clear direction on what to look at on tax returns specific lines and if deductions are allowed, that needs clarity as well.

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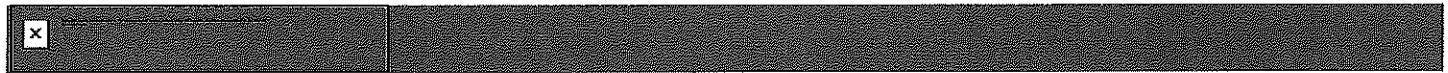
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[REDACTED]

From: [REDACTED] <noreply+07690262a3ef9299@formstack.com>
Sent: Wednesday, July 08, 2015 6:46 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Categories: Red Category



Formstack Submission for form A Clearer Code: Regulatory Reform

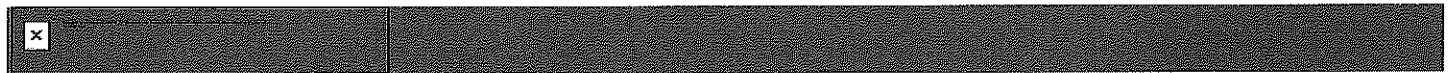
Submitted at 07/08/15 6:45 PM

Name (optional)::	Rebecca Duda
Company/Organization (if applicable) (optional)::	Town of Dracut
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::	DESE
Describe the regulatory issue or observation::	DESE and the Board of Education are considering stopping MCAS (603 CMR 30) and moving forward with PARCC. This is very concerning for several reasons. Firstly, the amount of time testing students under PARCC will be greater than under our current MCAS system. Secondly, the technology needed for PARCC further widens the inequity between more affluent communities whose students have access to technology and poorer communities whose students don't have access to the same technology.
Suggestions for easing regulatory compliance::	Stay the course with MCAS. It has proven to be a successful form of accountability for students and teachers.

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Sent: Wednesday, July 08, 2015 6:46 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Categories: Red Category



Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/08/15 6:45 PM

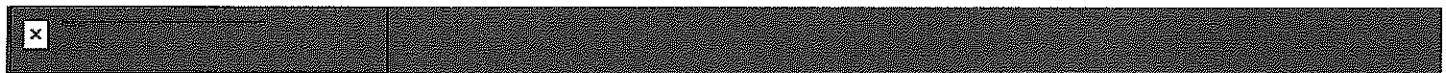
Name (optional)::	Rebecca Duda
Company/Organization (if applicable) (optional)::	Town of Dracut
Address (optional)::	[REDACTED]
Primary Phone (optional)::	[REDACTED]
Email (optional)::	[REDACTED]
CMR Number (If known): :	
General Regulatory Themes::	Education
Please list the Agency or Agencies affiliated with this regulation::	DESE
Describe the regulatory issue or observation::	DESE and the Board of Education are considering stopping MCAS (603 CMR 30) and moving forward with PARCC. This is very concerning for several reasons. Firstly, the amount of time testing students under PARCC will be greater than under our current MCAS system. Secondly, the technology needed for PARCC further widens the inequity between more affluent communities whose students have access to technology and poorer communities whose students don't have access to the same technology.
Suggestions for easing regulatory compliance::	Stay the course with MCAS. It has proven to be a successful form of accountability for students and teachers.

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From: [REDACTED] noreply+8a6afa2c407a6f2d@formstack.com>
Sent: Wednesday, July 29, 2015 11:05 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Red Category



Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/29/15 11:04 AM

Name (optional):: James Major

Company/Organization (if applicable) (optional):: Massachusetts Association of 766 Approved Private Schools

Address (optional):: [REDACTED]
[REDACTED]
[REDACTED]

Primary Phone (optional):: (781) [REDACTED]

Email (optional):: [REDACTED]

CMR Number (If known): : 603 CMR 46.02 and 102 CMR 3.02

General Regulatory Themes:: Education

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

Describe the regulatory issue or observation::

During the fall of 2014, the Executive Office of Education (EOE), the Department of Elementary and Secondary Education (ESE) and the Department of Early Education and Care (EEC) conducted a review and revision of their respective regulations pertaining to physical restraints in public and private schools and child care settings. The regulation revisions are scheduled to go into effect January 1, 2016. The Massachusetts Association of 766 Approved Private Schools (maaps) provided extensive written and oral comment on the proposed revisions to improve the behavioral support and management of students and children in educational settings. However, one of the approved regulation amendments will cause significant and unnecessary confusion, disruption and cost to schools, parents and the involved state agencies.

The regulation amendment in question is a definition of "consent" which was added to 603 CMR 46.02 and 102 CMR 3.02. In both regulations, the new definition contains a single sentence which is highly problematic: "In seeking parental consent of a 'licensee' (102 CMR 3.02) or 'public education program'

(603 CMR 46.02) shall not condition admission or continued enrollment upon agreement by the parent to the proposed use of any restraint."

The addition of this sentence to the definition of consent will make it impossible for approved private special education schools to assure the physical safety of students and staff. For example, C766 approved schools provide special education and treatment services to students who are known to have behavior which is highly aggressive and assaultive. If a parent refuses to provide consent for the use of any restraint to control the behavior, the school is prohibited from using the restraint and is prohibited from refusing admission to the student or terminating the student from the program. C766 approved schools will be in the completely untenable position of being required to maintain aggressive, assaultive students in their classrooms without the means to assure the safety of other students and staff. Representatives from ESE and EEC have indicated that they are developing Q&As and other guidance to address the issue and clarify that approved private special education schools can terminate students whom the school can no longer serve adequately. While the efforts of ESE and EEC to issue a Q&A are appreciated, the actual language of the regulation revision will be in conflict with any pending guidance from ESE and EEC and will inevitably cause confusion and conflict between schools and parents, leading to unnecessary and costly litigation between C766 schools and parents. It is also highly likely that state agencies and local school districts will be drawn into court proceedings at taxpayer expense.

**Suggestions for easing
regulatory compliance::**

Delete the sentence, "In seeking parental consent, a licensee shall not condition admission or continued enrollment upon agreement by the parent to the proposed use of any restraint." from 102 CMR 3.02 and delete the sentence, "In seeking parental consent, a public education program shall not condition admission or continued enrollment upon agreement by the parent to the proposed use of any restraint." from 603 CMR 46.02.

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From: noreply@formstack.com
Sent: Friday, October 02, 2015 7:33 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 10/02/15 7:32 PM

Name (optional)::

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

Address (optional)::

Primary Phone (optional)::

Email (optional)::

CMR Number (If known): : 602 CMR

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::

The regulations associated with obtaining a teaching or Principal license in Massachusetts are extremely bureacratic, burdensome, difficult to understand and satisfy, and present an unnecessary obstacle to talented people and career changers who wish to join the profession as well as experienced educators from other states who have relocated or wish to teach or become a Principal in Massachusetts.

The MTEL tests that are required o obtain a teaching license also result in a relatively high failure rate by those whose first language is not English (e.g. Chinese, Portuguese, Russian) as well as American citizens of color, specifically African-Americans and Latinos, as compared to citizens who are White.

Suggestions for improvements to the regulation::

- 1) The current distinctions between Temporary, Preliminary, Initial, and Professional licenses should be eliminated, as well as the monitoring, time, staff and expenses incurred by both the State and individuals as a result of the urrent regulations. There should be one level of licensure (Professional) that continues to need be renewed every five years.
- 2) Teachers, Principals, and other educators who are licensed in other states should be given reciprocity in Massachusetts without being required to take the MTEls or engage in the recently introduced Administrative Leadership Standard Assessment.
- 3) Passing scores on PRAXIS exams (used in virtually every other State) should be acceptable to obtaining a teaching, Principal or other educator

license in Massachusetts. PRAXIS exams should either totally replace the MTELs, or be accepted as the equivalent of MTELs.

These suggestions will improve efficiency, eliminate unnecessary bureaucratic hurdles, reduce costs and expenses, help to increase the level of diversity among teachers, and support the retention of talented teachers of every race and ethnicity who are struggling under the weight and ever-growing burden of DESE regulatory personal and professional demands, and leaving the profession as a result. Thanks for providing this opportunity to share our opinions. (School HR Administrator).

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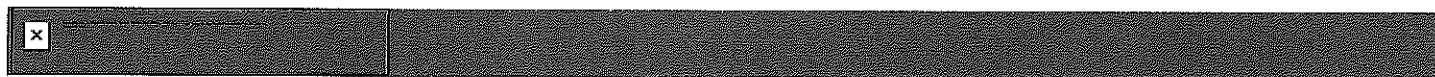
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From: noreply@formstack.com
Sent: Saturday, October 03, 2015 6:55 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Categories: Red Category



Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 10/03/15 6:54 AM

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:: Department of Elementary and Secondary Education

Describe the regulatory issue or observation:: Teacher Evaluation

Suggestions for improvements to the regulation:: I think teachers in their last year or two of teaching should be exempted from the evaluation process. In addition to it being pointless at that time, it would lessen the burden for the DESE as well as the schools.

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From: [REDACTED] <noreply+5577021855754586@formstack.com>
Sent: Wednesday, October 07, 2015 8:57 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 10/07/15 8:57 AM

Name (optional)::

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:: Department of Elementary and Secondary Education

Describe the regulatory issue or observation:: Protocols for Principals at public schools. My principal was hired specifically for her strengths in leadership and organization. She is now being asked to use "Distributed Leadership." Her ability to use her strengths is hampered by her efforts to implement this protocol.

Suggestions for improvements to the regulation:: Stop mandating "one size fits all" protocols for Principals. Trust in their ability to lead and facilitate effectively and respectfully. This forced method is creating an artificial environment in our small, close elementary school.

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From: [REDACTED]@formstack.com <noreply+5d2acb49d29c84fd@formstack.com>
Sent: Thursday, November 19, 2015 11:03 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 11/19/15 11:03 PM

Name (optional):: Julie Kelley

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

Address (optional):: [REDACTED]
[REDACTED]

Primary Phone (optional)::

Email (optional):: [REDACTED]@formstack.com

CMR Number (If known): : 603 CMR 10.07(7)

General Regulatory Themes:: Education

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

Describe the regulatory issue or observation:: Limitation to programs located outside of the district

Suggestions for improvements to the regulation::

The New England Center for Children (NECC) is an approved Chapter 766 school which offers a "partnership classroom" program where NECC opens classroom in the public district, which they staff and provide full resources and oversight for from their Southboro campus. It is a fantastic opportunity for the student to attend school in the district and have access to typical peers groups. Typically these students would have to be placed out of district due to severity of disability, and lack of qualified staffing to meet their needs. While NECC charges tuition to district for each student placed in these classrooms, the tuition is not eligible for 603 CMR 10.07(7) reimbursement as the placement is not considered a program outside the district.

(7) Tuition Costs. If a student is tuitioned to a program outside of the district, 603 CMR 10.07(6) shall not apply and the instructional cost shall be based on the tuition paid by the district. Program tuition rates shall exclude all transportation costs, and shall not exceed the rates approved by the Operational Services Division if such approval is required.

<http://www.mass.gov/courts/docs/lawlib/600-699cmr/603cmr10.pdf>

I respectfully request this language be changed to include in district programs run by approved Chapter 766 schools, for which tuition per student or classroom is charged.

The way the current language reads makes it more financially beneficial for district to just place student in a program outside the district away from their typical peers, which I am sure was certainly not the intent of the department when originally formulating these regulations.

I appreciate your consideration of my request.

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