



June 2, 2022

Jeffrey C. Riley, Commissioner  
Department of Elementary and Secondary Education  
75 Pleasant Street  
Malden, MA 02148

Massachusetts Board of Elementary and Secondary Education  
75 Pleasant Street  
Malden, MA 02148

Dear Commissioner Riley and members of the Board of Elementary and Secondary Education:

Thank you for the opportunity to comment on your proposal<sup>1</sup> to raise the passing standard (cut scores) for the Competency Determination (CD) on the high school English language arts (ELA), mathematics, and science and technology/engineering (STE) MCAS exams, starting with the class of 2026 (this year's 8<sup>th</sup> graders).

AFT Massachusetts firmly opposes this change. Raising the cut scores required for high school graduation would have a harmful impact on the Commonwealth's most vulnerable students, impairing their futures by potentially denying these students the opportunity to earn a high school diploma.

Your proposal would raise the minimum cut score to 470 on all three exams, with students scoring below 486 on the ELA and math exams also being required to fulfill an Educational Proficiency Plan (EPP) to graduate. A score of 470 is the demarcation between the "partially meeting expectations" and "not meeting expectations" categories, with students who score below 470 falling into the "not meeting expectations" category. Students in this category would face the greatest threat from this proposal, as they would be ineligible for graduation through the pathway of MCAS+EPP.

According to 10<sup>th</sup> grade MCAS scores from 2019 – the year before the pandemic – eight percent and nine percent of Massachusetts 10<sup>th</sup> graders scored in the "not meeting expectations" category in ELA and math respectively. Alarming, certain student subgroups were disproportionately represented in this category, including English learners, students with disabilities, economically

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<sup>1</sup> As publicly posted here: <https://www.doe.mass.edu/news/news.aspx?id=26763>

disadvantaged students, Black students, and Latinx students. These are the students who are put at greatest risk by your proposal, as the table below demonstrates:

**Percentage of Students Scoring Below 470 on the 10<sup>th</sup> Grade MCAS: 2019**

| Student Subgroup                    | Percentage Scoring Below 470 (“Not Meeting Expectations”) |      |
|-------------------------------------|---|------|
|                                     | ELA   | Math |
| All students                        | 8%  | 9%   |
| English learners                    | 56%   | 42%  |
| Students w/ disabilities            | 26%   | 32%  |
| Economically disadvantaged students | 18%   | 19%  |
| Latinx students                     | 19%   | 19%  |
| Black students                      | 16%   | 18%  |

Source: <https://profiles.doe.mass.edu/mcas/subgroups2.aspx?linkid=25&orgcode=00000000&fycode=2019&orgtypecode=0&>

The data above show that your proposal would jeopardize the futures of the Commonwealth’s most vulnerable student populations, making it even harder for historically marginalized groups to earn a high school diploma, a critical gateway to college and career success. It begs the question: How does the establishment of new barriers to a high school diploma square with DESE’s professed aim of advancing racial and social equity? Your proposal to raise the passing standard appears to be in direct conflict with your larger equity goals—and for that reason alone should be abandoned.

Your proposal would cause other harms as well:

- It would incentivize unproductive and wasteful test prep at the expense of meaningful instruction and student support. High school is a critical make-or-break time for students; schools should be empowered to help students become college-and-career-ready, not sidetracked by a narrow test that has little to no bearing on students’ futures.
- It would exacerbate students’ stress and anxiety at a time when they are already experiencing unprecedented mental-health challenges arising from the pandemic and other societal pressures.
- It would misleadingly elevate the MCAS as a credible measure of student learning and school quality when research suggests that just the opposite is true. The MCAS does not accurately measure student learning or school quality, and its employment for high-stakes decision-making serves to stigmatize communities of color and perpetuate segregation by race and class.<sup>2</sup>

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<sup>2</sup> See the research cited in AFT MA’s public comments on the Mass. school and district accountability system: [http://ma.aft.org/sites/default/files/aft\\_ma\\_public\\_comments\\_to\\_dese\\_accountability\\_regs\\_may\\_2022\\_final99.pdf](http://ma.aft.org/sites/default/files/aft_ma_public_comments_to_dese_accountability_regs_may_2022_final99.pdf)

We would also like to comment briefly on your reliance on a Brown University study<sup>3</sup> to justify your proposal. While that study shows a relationship between student MCAS scores and long-term college and career outcomes, it strikes us as a textbook example of *correlation, not causation*. Two decades of data show an ironclad link between socioeconomic status and MCAS achievement—that is, more-advantaged students get higher MCAS scores. At the same time, more-advantaged students are also more likely to attend and complete college and secure high-paying jobs, due to family-related privilege. Thus, it’s entirely predictable that there’s a strong correlation between MCAS scores and college/career success—the correlation is largely a byproduct of family advantage driving both outcomes.

What the Brown study does not explain is how the mere existence of an MCAS-based graduation requirement *causes* the better educational and career outcomes or helps *reduce* inequality. Students from more privileged family backgrounds enjoyed more college and career success before MCAS—and, sadly, this continued to be the case after MCAS was initiated. How does the establishment of an MCAS-based graduation requirement (or raising the passing standard in this case) change that reality?

The existence of unequal outcomes stemming from family background differences is a tale as old as time. Instead of erecting *more* barriers to equitable college and career outcomes, as your proposal would do, the focus should be on mitigating the inequalities that lead to the disparate outcomes in the first place.

### **A Better Path Forward: Expand the EPP Option to More Students**

If you share the concern that raising cut scores would exacerbate rather than reduce inequality, what other options exist? AFT Massachusetts supports the current EPP option as a pathway to graduation and recommends expanding it to a larger pool of students.

Currently, the EPP option is only available to students who score at or above a certain cut score on the MCAS. Under your proposal, that cut score would be raised, restricting the EPP to students who fall in the lower range of the “partially meeting expectations” category.

However, the EPP option could be expanded to include students who fall in the “not meeting expectations” category as well. If the Board and DESE were to pursue an expansion of the EPP option, differentiated pathways could be considered: 1) an EPP Pathway 1 for students who achieve a certain MCAS cut score; and 2) an EPP Pathway 2 for students who do not.

An EPP Pathway 1 could look very similar to what is used now. An EPP Pathway 2 could incorporate all the elements of Pathway 1 but layer on additional safeguards, such as DESE oversight and/or approval at the outset of the plan and a detailed delineation of the courses, assessments, supports, interventions, and other educational and college and career plans that must be part of the pathway. We would recommend creating a special task force – made up of key stakeholder groups – to work with DESE to develop detailed guidance on an expedited timetable.

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<sup>3</sup> See agenda item 2 at <https://www.doe.mass.edu/bese/docs/fy2022/2022-04/>.

Finally, and of critical importance, we do not support MCAS re-takes being a required component of any pathway to high school graduation, including any expansion of the EPP as recommended above. These re-tests—and the preparation for them—are a waste of valuable teaching and learning time, and they cause unnecessary stress and anxiety. We urge you to eliminate all MCAS re-test requirements from existing and proposed regulations, regardless of how students score on their first MCAS attempt and what category they fall into.

In summary, instead of doubling down on a flawed test that promotes inequality, please rescind your proposal to increase MCAS cut scores and put your energies into developing more non-MCAS pathways to a high school diploma, such as the expanded EPP option outlined above. Thank you for considering these comments, and please feel free to reach out with questions or comments. We look forward to further discussion on this topic.

Sincerely,

A handwritten signature in black ink that reads "Beth Kontos". The signature is written in a cursive style with a large, sweeping flourish at the end.

Beth Kontos  
President, AFT Massachusetts

cc: Rob Curtin, Department of Elementary and Secondary Education  
Russell Johnston, Department of Elementary and Secondary Education  
Michol Stapel, Department of Elementary and Secondary Education