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TO: Massachusetts Board of Elementary and Secondary Education  
FROM: Cambridge Education Association  
SUBJECT: Comments against Proposed Amendments to 603 CMR 35.00  
DATE: January 10, 2017

The Executive Board of the Cambridge Education Association strongly recommends that the Massachusetts Board of Secondary and Elementary Education **reject** the amendments to the Educator Evaluation System proposed by Commissioner Chester. We believe that these changes will be harmful to the quality of education for Public School students in Massachusetts. We are in favor of effective use of assessments, in favor of holding educators accountable for using assessment effectively, and opposed to these amendments because they will reduce the effectiveness of the use of assessments.

The educator rubric includes effective use of assessments in Standard I (Curriculum, Planning and Assessment), Indicators B (Assessment Indicator) and C (Analysis Indicator). Our educators should be held accountable for effective use of assessments through these indicators. Assessment results are included in the Educator Evaluation System through the Student Learning Goal. It is the responsibility of the evaluator to ensure that this goal is used fairly and effectively in the evaluation process. While the implementation of the Student Learning Goal is not yet optimal across the board, it has the potential to be.

Moreover, we believe that increasing the stakes for assessment results by including them as a part of the Overall Rating is detrimental to the professional culture of our schools. The higher the stakes are for an assessment, the less open educators will be to sharing those results with colleagues and using the results to genuinely reflect and improve upon their practice. We want our educators to set the bar high for themselves and their students and be as reflective about the assessment results as possible to maximize the effectiveness of assessments on educator practice and student learning.

As we stated in our position statement from February 7, 2016 about District Determined Measures, “It is the position of the CEA that implementation of this requirement is both deeply flawed in practice and inherently destructive to professional working conditions.” We continue to hold this position and furthermore believe that the proposed amendments to the regulations will compound the negative effect of this already problematic practice.

We strongly urge you to reject the proposed amendments.