



THE GENERAL COURT OF MASSACHUSETTS
STATE HOUSE, BOSTON 02133-1053

May 28, 2021

Elizabeth Bennett
Career and Technical Education Office
Department of Elementary & Secondary Education
75 Pleasant Street
Malden, MA 02148

RE: Public Comment for the Proposed Amendments to 603 CMR 4.03(6)(a) – Vocational
Technical Education Regulations

Dear Ms. Bennett:

On behalf of the Gateway Cities Legislative Caucus (GCLC), we would first like to thank you and your colleagues for taking the time to join us at our last meeting. Concerns surrounding the admission criteria for vocational-technical high schools have been a focus of our membership for some time. As Gateway Cities, our communities tend to have a larger share of students who are economically-disadvantaged, students of color, students with disabilities, and English Language Learners – categories of pupils which your own data suggest struggle to apply to or attend vocational high schools. Their aptitude for vocational and technical training has often not been recognized in the outdated (and potentially biased) criteria currently used to determine their eligibility – grades, attendance, disciplinary records, and guidance counselor recommendations.

Even the smaller cross-section of school districts represented by the Gateway Cities Legislative Caucus shows that there is no one size fits all solution. Some voc-tech high schools struggle with ELL admissions, some with minority recruitment, some have enormous waitlists, while others have open seats. For these reasons, we do support granting school districts flexibility to address their local admission needs and challenges.

However, this flexibility comes with a serious responsibility to address the underlying equity concerns affecting the enrollment of these underserved student populations. A district's admission policy must meet strict and clearly defined civil rights standards. A general standard to meet the basic demographics of sending districts may not be sufficient to ensure equitable access for these protected classes of students. While we do not necessarily agree that a lottery system will alleviate all of these concerns, new admissions policies that allow for only slightly altering the four original criteria will not be enough. We have an opportunity now to be proactive and improve upon the minimum standard which we recognize is based on a legacy of the

structural disenfranchisement of these students. In our opinion, any admissions plan should – not may -- be scrutinized by impartial stakeholders from outside the district and at the Department for Elementary and Secondary Education (DESE) for a neutral assessment.

You have put together a very thoughtful and comprehensive proposal and we welcome the opportunity to work together on making the option of vocational-technical high school education available to all Massachusetts students regardless of what language they speak at home, how they learn, or where they live.

Thank you for your consideration. If you should have any further questions, please reach out.

Sincerely,

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House Chair, GCLC*

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*State Senator, First Hampden & Hampshire
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