# MEMORANDUM

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| **To:** | Members of the Board of Elementary and Secondary Education |
| **From:** | Russell D. Johnston, Acting Commissioner  |
| **Date:** | March 18, 2025 |
| **Subject:** | Commonwealth of Massachusetts Virtual Schools – Report on Conditions for Greater Commonwealth Virtual School and TEC Connections Academy Commonwealth Virtual School |

Massachusetts law, G.L. c. 71, § 94, authorizes the Board of Elementary and Secondary Education (Board) to adopt regulations governing publicly funded virtual schools and, through the Department of Elementary and Secondary Education (Department), to oversee the establishment and operation of Commonwealth of Massachusetts virtual schools (CMVS). A CMVS is a public school governed by a board of trustees where teachers primarily teach from a remote location using the Internet or other computer-based methods and students are not required to be located at the physical premises of the school.

Two virtual schools currently operate in Massachusetts under certificates the Board granted: Greater Commonwealth Virtual School (GCVS) and TEC Connections Academy Commonwealth Virtual School (TECCA). Under G.L. c. 71, § 94, and 603 CMR 52.11, the Board renewed the certificates of GCVS and TECCA on [March 22, 2022](https://www.doe.mass.edu/bese/docs/fy2022/2022-03/item5.docx) and placed conditions on each school’s certificate to remedy concerns documented during the renewal process. This memorandum provides a report on the progress made by each CMVS on the conditions imposed by the Board and includes rationales to support my recommendations regarding these conditions.

Pursuant to the virtual school statute, G.L. c. 71, § 94(j), and the CMVS regulations at 603 CMR 52.12, I recommend that the Board remove seven conditions imposed on GCVS and extend one condition related to academic results. Further, I recommend that the Board remove two conditions imposed on TECCA, extend one condition related to academic results, and impose a new condition related to the school’s financial oversight.

**Greater Commonwealth Virtual School**

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| **Type of CMVS**  | CMVS 1 | **Number of Districts Capped for Enrollment[[1]](#footnote-2)** | 27 |
| **Year Opened** | 2013 | **Current Age of School** | 12 |
| **Maximum Enrollment** | 1,200 | **Current Enrollment** | 1,184 (October 2024) |
| **Current Grade Span** | K-12 | **Years Renewed**  | 2016, 2019, 2022 |
| **Students on Waitlist** | 346 (February 24, 2025) | **Location of Administrative Offices** | 238 Main Street3rd FloorGreenfield, MA 01301 |
| **Mission Statement:** The Greater Commonwealth Virtual School, a public school of choice, serves students from across Massachusetts who need a learning community that is accessible, flexible, and inclusive. As a pioneer of online learning, we empower our educators to tailor learning experiences to each student’s strengths, interests, and challenges. We redefine and change how students and teachers engage through innovative technology, while ensuring mastery of competencies embedded in a rigorous curriculum.  |

**School History**

The Department received an application from Greenfield on April 22, 2013, to establish a new CMVS beginning in the 2013-2014 school year. On June 25, 2013, the Board granted a three-year certificate to the board of trustees of GCVS, effective July 1, 2013, as required by Section 6 of Chapter 379 of the Acts of 2012.[[2]](#footnote-3) To assist GCVS in meeting the standards expected of a CMVS, the Board imposed several conditions on its certificate.[[3]](#footnote-4)

GCVS continued to have challenges resulting in further conditions and placing the school on probation. GCVS operated under probationary status from October 2014 until March 2019, with the Board modifying the conditions on the school’s certificate twice.[[4]](#footnote-5)

In October 2022, the Board renewed the school’s certificate for a four-year period from July 1, 2022, through June 30, 2026, with eight conditions. While the school had implemented an action plan to improve its educational program, concerns remained about academic outcomes; quality of program delivery, particularly for English learners; and organizational capacity.

**Progress Toward Meeting Conditions**

The existing conditions and a summary of key evidence related to each condition follow.

**Condition 1:** Greater Commonwealth Virtual School must continue to submit to the Department, at virtualschools@mass.gov, board meeting agendas and materials prior to each board meeting at the same time that these items are sent to the school’s board members. Further, the school must submit to the Department the minutes of these proceedings as soon as the school’s board approves them. The Department reserves the right to require the submission of additional information, such as quarterly or monthly financial statements, if board materials do not already include this information. The school must provide such additional information within two business days.

 **Summary of Evidence**

Since July 2022, the school has submitted board and committee meeting minutes prior to each meeting and meeting minutes to the Department as soon as the school’s board approves them.

**Condition 2:** By July 15, 2022, Greater Commonwealth Virtual School must conduct, document, and submit to the Department evaluations of its special education and English learner education (ELE) programs in a manner consistent with Department expectations. Such evaluations must include comparative data analyses, interpretation of results, and recommendations for needed changes to each program.

 **Summary of Evidence**

On July 15, 2022, the school submitted a draft of its special education and ELE program self-evaluations. The Department provided feedback, and the school submitted revised program self-evaluations on October 28, 2022. Both evaluations included comparative data analyses, interpretation of results, and recommendations for needed changes to each program.

**Condition 3:** By August 1, 2022, Greater Commonwealth Virtual School must develop and include four-year goals for non-statewide assessments in its Accountability Plan. These goals must be sufficient to allow the school to demonstrate a track record of academic success during the certificate term.

 **Summary of Evidence**

On July 29, 2022, the school submitted a final draft of its accountability plan that included four-year goals for non-statewide assessments. On November 10, 2022, the school’s revised accountability plan received approval from the commissioner; the accountability plan establishes goals and measures for its third certificate term (2022-2026).

**Condition 4:** By August 15, 2022, Greater Commonwealth Virtual School must complete actions and reporting as required by the Department’s Office of Language Acquisition.

 **Summary of Evidence**

In November 2020, the Department’s Office of Language Acquisition conducted a Tiered Focused Monitoring (TFM) Review and had three findings regarding the school’s English language education program. As of February 2022, GCVS had not fully met progress reporting requirements pertaining to two of the three findings, and the school had not made progress in effectively identifying an appropriate ESL curriculum or implementing a plan to provide translation services to families. On May 25, 2022, the Department’s Office of Language Acquisition notified GCVS that the school addressed all three findings and no further progress reports were required.

**Condition 5:** By September 1, 2022, Greater Commonwealth Virtual School must submit for Department approval an updated version of its comprehensive action plan from 2019 to improve academic performance and that addresses other areas for improvement outlined in the summary of review for 2022. The action plan must set clear and specific benchmarks with a timetable and deadlines for completion of key tasks that is sufficient to allow the school’s board of trustees and the Department to monitor implementation.

 **Summary of Evidence**

On September 1, 2022, the school submitted a draft of its action plan to improve academic performance and other areas identified in the summary of review. The Department provided feedback, and the school submitted a revised action plan on November 21, 2023. The Department approved the revised action plan. To address other areas for improvement, GCVS further developed a system of student supports, piloted new curricula, implemented academic screeners, created data review cycles, and worked to improve alignment of the school’s curriculum with state standards.

**Condition 6:** The school must report on a quarterly basis to the Department and its board of trustees on the progress toward meeting the benchmarks in its updated comprehensive action plan, including the timetable and deadlines for completion of key tasks.

 **Summary of Evidence**

Since April 2023, the school has submitted quarterly reports to the Department on the progress toward meeting the benchmarks noted in its action plan. The Department received the most recent quarterly update in January 2025. According to board meeting minutes, the school provides quarterly updates to the board of trustees on the progress toward meeting the benchmarks in its action plan.

**Condition 7:** By September 1, 2022, the board of trustees must engage a consultant and participate in training about governance roles and responsibilities, including obligations related to the Open Meeting Law. By October 15, 2022, the board must develop an action plan and schedule for adequate oversight of the school according to the CMVS Performance Criteria, Criterion 8: Governance.

 **Summary of Evidence**

On August 31, 2022, the board of trustees engaged in a governance training with the Massachusetts Association of School Committees and discussed the board’s roles and responsibilities, including obligations related to the Open Meeting Law. On December 7, 2022, the school’s board submitted a draft of its action plan to demonstrate adequate oversight of the school. The Department provided feedback, and the school’s board submitted a revised action plan on March 7, 2023. The Department approved the revised action plan.

**Condition 8:** By December 31, 2024, the school must demonstrate that it is an academic success by providing evidence of significant and sustained academic improvement in mathematics, English language arts, and science for all students and all student subgroups.

 **Summary of Evidence**

According to the statewide system of accountability, the school has shown some academic improvement, but that improvement is not yet significant or sustained. Since the beginning of the implementation of the current statewide system of accountability, the school’s accountability percentile rose from 4 in 2019 to 14 in 2022, 20 in 2023, and 27 in 2024. While the school made substantial progress toward targets in 2023 and 2024, the Department classified GCVS as requiring assistance or intervention both years due to the school’s low graduation rate and low participation rate for all students and all student groups. The percentage of students in grades 3 through 8 meeting or exceeding expectations decreased between 2022 and 2024 in all subject areas (English language arts, mathematics, and science). The percentage of students in grade 10 meeting or exceeding expectations generally increased between 2022 and 2024 for all subject areas.

Due to the school’s high churn rates, the Department required GCVS to create goals in its Accountability Plan to better assess outcomes for academic achievement and growth based on performance on non-statewide assessments. GCVS provided some additional evidence of academic success in reports related to its Accountability Plan for 2022-23 and 2023-24. In 2023-24, according to the results of the Star 360 reading assessments, 91 percent of students enrolled for the full academic year scored at grade level, met their relevant student growth percentile goal, or increased by one grade level by the end of the school year, which was an increase from 83 percent of students in 2022-23. According to the results of the Star 360 mathematics assessments, 85 percent of students enrolled for the full academic year scored at grade level, met their relevant student growth percentile goal, or increased by one grade level by the end of the 2023-24 school year, which was a small increase from 84 percent of students in 2022-23.

**Recommendation:**

Given the evidence presented above, I recommend that the Board remove seven conditions imposed on GCVS and extend one condition related to academic results. The school has shown some academic improvement; academic performance, however, remains an area of concern. Therefore, I recommend extending the existing academic condition by one year, through the end of the current certificate term.

**Condition:** By December 31, 2025, the school must demonstrate that it is an academic success by providing evidence of significant and sustained academic improvement in mathematics, English language arts, and science for all students and all student subgroups.

GCVS will seek renewal of its certificate during the 2025-26 school year and will receive a renewal inspection review during the fall of 2025. With further evidence gathered during the renewal inspection and another year of assessment data, the Board can reassess the strength of the school’s academic program in March 2026.

**TEC Connections Academy Commonwealth Virtual School**

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| **Type of CMVS**  | CMVS 1 | **Number of Districts Capped for Enrollment[[5]](#footnote-6)** | 27 |
| **Year Opened** | 2014 | **Current Age of School** | 11 |
| **Maximum Enrollment** | 3,000 | **Current Enrollment** | 2,969 (October 2024) |
| **Current Grade Span** | K-12 | **Years Renewed**  | 2017, 2022 |
| **Students on Waitlist** | 800 (February 24, 2025)  | **Location of Administrative Offices** | 141 Mansion DriveSuite 300East Walpole, MA 02032 |
| **Mission Statement:** Through a lens of diversity, equity, inclusion, and belonging TEC Connections Academy will provide students a high quality, innovative, virtual public school experience through access to education that empowers students to demonstrate respect, life skills, growth mindset, critical thinking, communication skills, and application of knowledge to prepare them for the next stage of their life’s journey. |

**School History**

The Education Cooperative (TEC) submitted an application for a virtual certificate to the Department in spring 2013. On February 24, 2013, the Board granted a three-year certificate to TECCA. Since its founding, TECCA has maintained a contractual relationship with Connections Education LLC (CE) in which CE provides curricula for English language arts, mathematics, science, and social studies in grades K through 12 and the school’s learning management system.

When the Board renewed the school’s certificate in 2017 for five years, it included conditions related to MCAS participation and serving English learners. In 2022, while the school had met these two conditions, concerns remained about academic outcomes, delivery of its academic program, and repeated findings of significant deficiencies or material weaknesses in its financial audits.[[6]](#footnote-7) Therefore, in October 2022, the Board renewed the school’s certificate for four years, from July 1, 2022, through June 30, 2026, with three conditions.

**Progress Toward Meeting Conditions**

The existing conditions and a summary of key evidence related to each condition follow.

**Condition 1:** By August 1, 2022, TEC Connections Academy Commonwealth Virtual School must develop four-year goals for non-statewide assessments in its Accountability Plan that will allow the school to demonstrate a track record of academic success during the certificate term.

 **Summary of Evidence**

On July 22, 2022, the school submitted a final draft of its accountability plan that included four-year goals for non-statewide assessments. On February 7, 2023, the commissioner approved the school’s revised accountability plan; the accountability plan establishes goals and measures for its third certificate term (2022-2026).

**Condition 2:** By January 1, 2023, the board of TEC Connections Academy Commonwealth Virtual School must ensure a timely submission of its annual financial audit; the fiscal year 2022 audit must demonstrate progress or full resolution of findings outlined in prior audits.

 **Summary of Evidence**

During the previous certificate term (2017-2022), TECCA’s financial audits contained findings of material weaknesses and/or significant deficiencies each year. The school also submitted its audit for fiscal year 2021 past the January 1 deadline, as required by 603 CMR 52.08 (3). The repeated findings and late submission of the audit resulted in the Board imposing this condition on the school’s certificate.

The school submitted its audit for fiscal year 2022 by the date due, but it contained a material weakness regarding unresolved prior findings related to lack of internal controls and included significant questioned costs. The school’s audit for fiscal year 2023 noted that the school resolved its findings of material weakness from previous years and contained no findings. TECCA’s audit for fiscal year 2024 contained a material weakness related to procurement processes for federal grants in which TECCA did not follow federal rules.

**Condition 3:** By December 31, 2024, the school must demonstrate that it is an academic success by providing evidence that the school has exhibited significant and sustained academic improvement in mathematics, English language arts, and science for all student groups.

 **Summary of Evidence**

According to the statewide system of accountability, the school has not shown academic improvement. Since the beginning of the implementation of the current statewide system of accountability, the school’s accountability percentile was 16 in 2022, 18 in 2023, and 22 in 2024. While the school made substantial progress toward targets in 2023 and 2024, the Department classified the school as requiring assistance or intervention both years due to the school’s low graduation rate and low participation rate for all students and all student groups. The percentage of students meeting or exceeding expectations has declined between 2022 and 2024 in all subject areas (English language arts, mathematics, and science) for grades 3 through 8 and grade 10.

Due to the school’s high student churn rates, the Department required TECCA to create goals in its Accountability Plan to better assess outcomes for academic achievement and growth based on performance on non-statewide assessments. TECCA provided some additional evidence of academic success in reports related to its Accountability Plan for 2022-23 and 2023-24. In 2023-24, according to Star 360 reading assessments, 82 percent of students enrolled for the full academic year scored at grade level by the end of the year, met their relevant student growth percentile goal, or increased by one grade level, which was a slight decrease from 83 percent of students in 2022-23. According to the results of the Star 360 mathematics assessments, 81 percent of students enrolled for the full academic year scored at grade level by the end of the year, met their student growth percentile goal, or increased by one grade level, which was a slight decrease from 83 percent of students in 2022-23.

**Recommendation**

Given the evidence presented below, I recommend that the Board remove two conditions imposed on TECCA, extend one condition related to academic results, and impose a new condition related to the school’s financial oversight. The school has shown some academic improvement; academic results, however, remain an area of concern. Therefore, I recommend extending the academic condition by one year, through the end of the current certificate term.

Further, I recommend imposing a new condition related to the school’s financial oversight. Although the school addressed the previous condition related to timely submission of its annual financial audit and some of the findings outlined in prior audits, its audit for fiscal year 2024 highlighted reoccurring concerns regarding a lack of sufficient financial oversight.

I recommend that the Board impose the conditions that follow.

**Condition 1:** By July 1, 2025, the school will provide the Department with sufficient evidence that it has addressed all the commitments articulated in the Corrective Action Plan related to its audit for fiscal year 2024.

**Condition 2:** By December 31, 2025, the school must demonstrate that it is an academic success by providing evidence of significant and sustained academic improvement in mathematics, English language arts, and science for all students and all student subgroups.

TECCA will seek renewal of its certificate during the 2025-26 school year and will receive a renewal inspection review during fall 2025. With further evidence gathered during the renewal inspection and another year of assessment data, the Board can assess the school’s performance on these two conditions by March 2026.

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If you have any questions regarding my recommendations, please contact Alison Bagg, Director of the Office of Charter Schools and School Redesign (781-338-3218); Regina Robinson, Deputy Commissioner (781-338-3104); or me.

Attachments

Greater Commonwealth Virtual School: Motion

TEC Connections Academy Virtual School: Motion

1. As of March 12, 2024, 27 districts have voted to cap the total enrollment of its students in CMVSs. The districts that have voted to cap their total enrollment in CMVSs include Athol-Royalston Regional (Athol and Royalston), Belchertown, Brimfield, Chicopee, Erving, Gardner, Gateway Regional (Blandford, Chester, Huntington, Middlefield, Montgomery, and Russel), Hardwick, Holland, Hubbardston, Lee, Mashpee, North Adams, Orange, Palmer, Pittsfield, Southbridge, Spencer East Brookfield Regional (East Brookfield and Spencer), Springfield, Sunderland, Ralph C. Mahar Regional (New Salem, Orange, Petersham, and Wendell), Richmond, Tantasqua Regional (Brimfield, Brookfield, Holland, Sturbridge, and Wales), Quabbin Regional (Barre, New Brainstree, and Oakham), Wales, Ware, Wareham, Webster, Winchendon. (Source: CMVS Regulatory Notification of 2024-2025 Sending Districts 1% Vote At-Cap) [↑](#footnote-ref-2)
2. On January 2, 2013, Governor Patrick signed into law Chapter 379 of the Acts of 2012, “An Act Establishing Commonwealth Virtual Schools” (the Act), most of which is codified as G.L. c. 71, § 94. Section 6 of the Act required the Board to grant a certificate for GCVS to operate a CMVS upon submission of a timely application that addressed the information specified in G.L. c. 71, § 94. [↑](#footnote-ref-3)
3. These terms were described in the Commissioner’s memorandum to the Board dated June 18, 2013: <http://www.doe.mass.edu/boe/docs/fy2013/2013-06/item3.html>. [↑](#footnote-ref-4)
4. During the school’s first certificate term, in October 2014, the Board placed GCVS on probation with conditions due to concerns regarding governance, the academic program, and academic results. In February 2016, the Board renewed the school’s certificate for a three-year period from July 1, 2016, through June 30, 2019, extended the school’s probation, and imposed conditions related to governance, enrollment, MCAS participation rates, and academic results. In March 2018, the Board extended the school’s probationary status, maintained the prior four probationary conditions, and added a new condition related to the provision of services for English learners. In March 2019, due to GCVS’s progress in meeting probationary conditions, the Board removed probation from the school’s certificate, renewed the school’s certificate for a three-year period from July 1, 2019, through June 30, 2022, and imposed six conditions related to governance, enrollment, the academic program, and academic results. [↑](#footnote-ref-5)
5. See footnote 1 for a list of districts. [↑](#footnote-ref-6)
6. [↑](#footnote-ref-7)