

**Competency Determination  
Guidance and Policy Submission Process  
July 2025**

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Commissioner**



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# Introduction

## Key Information

- ✓ In November 2024, Massachusetts voters approved a ballot question that removed the use of MCAS as the sole basis for meeting the requirements of the state's Competency Determination.
- ✓ In May 2025, the Board of Elementary and Secondary Education voted to amend its [regulations](#) on the Competency Determination (603 CMR 30.00).
- ✓ According to the amended regulations, districts must develop a Competency Determination policy that details how students will meet the new requirements; the policy must be approved by the governing body of the district, posted publicly, and submitted to the Department of Elementary and Secondary Education.
- ✓ The district's CD policy must be approved by the district's governing body no later than **October 31, 2025**, and submitted to the Department via **GEM\$** upon approval.
- ✓ This guidance document provides further details on the updated requirements and explains the submission process.

## Context and Background

Massachusetts state law requires students to satisfy the requirements of the Competency Determination (CD) to graduate from high school.<sup>1</sup> In November 2024, Ballot Question 2 amended the Competency Determination requirements as shown below, where the text that is underlined was newly added and the text that has been struck through was removed.

The "competency determination" shall be based on the academic standards and curriculum frameworks for tenth graders in the areas of mathematics, science and technology, history and social science, foreign languages, and English, and shall represent a determination that a particular student has demonstrated mastery of a common core of skills, competencies and knowledge in these areas, ~~as measured by the assessment instruments described in section one I~~ by satisfactorily completing coursework that has been certified by the student's district as showing mastery of the skills, competencies, and knowledge contained in the state academic standards and curriculum frameworks in the areas measured by the MCAS high school tests described in section one I administered in 2023, and in any additional areas determined by the board. Satisfaction of the requirements of the competency determination shall be a condition for high school graduation. If the particular student's assessment results for the tenth grade do not demonstrate the required level of competency, the student shall have the right to participate in the assessment program the following year or years. Students who fail to satisfy the requirements of the competency determination may be eligible to receive an educational assistance plan designed within the confines of the foundation budget to impart the skills, competencies and knowledge required to attain the required level of mastery. The parent, guardian or person acting as parent of the student shall have the opportunity to review the remedial plan with the student's teachers. Nothing in

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<sup>1</sup> [M.G.L. c. 69, § 1D\(i\)](#)

this section shall be construed to provide a parent, guardian, person acting as a parent or student with an entitlement to contest the proposed plan or with a cause of action for educational malpractice if the student fails to obtain a competency determination.

In February 2025, the Board of Elementary and Secondary Education (Board) voted to solicit public comments on proposed amendments to the regulations on the *Massachusetts Comprehensive Assessment System and Standards for Competency Determination*.<sup>2</sup> The Department of Elementary and Secondary Education (Department) invited public comment on the proposed regulatory changes from February 26 through April 4, 2025. At the May 20, 2025 Board meeting, the Board voted to amend the regulations. The amended regulations are available on the [Department's website](#).

## Comparison: Competency Determination and Local Graduation Requirements

The CD is one requirement a student must satisfy to graduate with a diploma from a Massachusetts public high school. To graduate, a student must:

- Fulfill the CD requirement, as determined by the local school district and in compliance with the requirements described below;
- Meet local graduation requirements, as determined by the local school district; and
- For students with disabilities, have received a free and appropriate public education (FAPE).

While the statutory language for the CD requirement only considers the skills, competencies, and knowledge contained in the state academic standards and curriculum frameworks through grade 10, local graduation requirements are at the sole discretion of the district and cover through grade 12. Local graduation requirements may go beyond the requirements of the CD policy to include requirements related to credit-earning, attendance, participation in extracurricular activities, community service, etc. Local graduation requirements are also established by the district and may align with the CD policy but cannot take the place of the CD policy.

As provided in the updated regulations, the Department must collect both the CD policy and the local graduation requirements from each district.

For the purpose of this guidance document, as defined in the regulations, the term “district” shall mean a municipal school department or regional school district, acting through its school committee or superintendent of schools; a county agricultural school, acting through its board of trustees or superintendent/director; or any other public school established by statute, charter, or certificate, acting through its governing board of trustees.

## Updated Competency Determination Requirements Requirements for Students

As described in the new regulations, the CD represents two accomplishments: showing a **mastery** of skills in English language arts, mathematics, and science; and the **satisfactory**

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<sup>2</sup> [603 CMR 30.00](#)

**completion of relevant coursework** aligned to the standards measured by the high school English language arts, mathematics, and science MCAS assessments administered in 2023.

To **show mastery**, a student must successfully complete in accordance with the district’s grading policy: (1) the final assessment for a course; or (2) a capstone or portfolio project; or (3) an equivalent measure identified in the district’s CD policy.

To **satisfactorily complete coursework**, a student must earn full credit in accordance with the district’s grading policy in the courses listed in the table below.

*Table 1: Coursework Requirements*

Content Area	Coursework Requirements	Notes
English Language Arts	The equivalent of two years of high school English language arts courses.	To satisfy this course requirement, the English Language Arts courses must be taken in grades 9-12.
Mathematics	The equivalent of one year of both Algebra I and Geometry courses, or the equivalent of one year of both Integrated Math I and Integrated Math II. Whether to follow an Algebra/Geometry or Integrated Math I/II course sequence is determined by the district, but the equivalent length of the courses must still be met.	Middle school math courses may be certified by the district as meeting the coursework requirement for the mathematics component of the CD. Districts must confirm that the course aligns to the <b>high school</b> Algebra I/Geometry/Integrated Math I/Integrated Math II standards as listed in the 2017 Massachusetts Mathematics Curriculum Framework.
Science	The equivalent of one year of any one of the following disciplines: Biology, Physics, Chemistry, or Technology/Engineering.	To satisfy this course requirement, the science course must be taken in grades 9-12.
U.S. History (beginning with the graduating class of 2027)	The equivalent of a one-year United States history course.	To satisfy this course requirement, the U.S. History course must be taken in grades 9-12.

The requirements above refer to “the equivalent of” a specified number of years of coursework to accommodate the different instructional schedules that exist across Massachusetts’ high schools. For example, some schools may schedule year-long courses, while others may condense the same content into a single semester through block scheduling.

Students who met the CD standard in English language arts, mathematics, and/or science prior to January 3, 2025 (i.e., students who earned a CD through a regular or retest administration of the MCAS, or through a DESE appeal process) retain that benefit.

### Aligned Courses

The Department has developed a list of courses, identified by Student Course Schedule (SCS) code, that DESE believes may be aligned with the coursework requirements outlined in the CD

regulations. The list of courses is available in a [file on our website](#). The final determination of which courses are certified to meet the coursework requirements remains with the district.

### Considerations for Students with Disabilities and English Learners

When creating a CD policy and implementing the updated requirements, it is essential that districts consider how they apply to various student groups to promote equitable access and support.

The CD requirements do not impact the entitlements that **students with disabilities** have under IDEA or M.G.L. c. 71B. Consistent with federal law, a district must provide FAPE to a student with disabilities *and* must also determine that the student has met CD and local graduation requirements prior to graduating that student. Students with disabilities placed in out-of-district placements must meet the requirements of the CD policy of the placing school district. See the Department's [Special Education Policy Memo SY2025-2026-2 Graduation and Transition Planning for Students with IEPs](#) for more information.

When planning coursework for **English Learners**, it is important to consider the different pathways students may take as they develop their English skills and provide for students at all levels of English proficiency to have equal opportunity to meet all CD requirements. Districts are responsible for selecting and certifying the courses that meet the CD requirements, including deciding whether English as a Second Language (ESL) courses can count toward the English Language Arts (ELA) coursework component.

The Department recommends that districts consider certifying ESL courses as meeting the ELA requirement for the CD only for students at the foundational levels of English proficiency (i.e., Levels 1 and 2 on ACCESS). In these cases, ESL courses may count toward the ELA coursework requirement, provided that they explicitly integrate grade-appropriate ELA standards with English Language Development (ELD) standards, using instructional scaffolds that are appropriate to students' English proficiency levels. Districts will be asked to provide information about how they are implementing this approach as part of the submission process.

### Considerations for Late-Enrolling Students

Students who enroll in a Massachusetts public high school after their ninth-grade year must be afforded the opportunity to earn the CD. Districts should describe in their policy how the district will determine a late-enrolling student's eligibility for a CD. Options may include a transcript review, course-taking, or, in limited instances, via a qualifying MCAS score (see Role of MCAS in Limited Circumstances). Regardless of the mechanism for determining the student's eligibility for the CD, the district must ensure that state requirements related to equivalent course length, relevant coursework, and a demonstration of mastery are met. The Department reserves the right to audit a district's CD policy related to late-enrolling students. See Appendix A for more information about the Audit process.

### Role of MCAS in Limited Circumstances

In the limited circumstance where a district is unable to document a student's prior coursework, the regulations allow for a student to earn the CD by:

1. Attaining a qualifying score of at least "Meeting Expectations" or "Exceeding Expectations" achievement levels on the relevant high school MCAS assessment; or

2. Meeting the standard for a substituted equivalent that the district certifies satisfies the same academic standards.

The Department reserves the right to audit a district's use of the MCAS exception in awarding CDs. See Appendix A for more information about the Audit process.

### Appeals Process

The amended regulations state that each district's CD policy must describe a process through which a student may appeal the district's decision regarding awarding a CD. The appeals process is determined by the district and may include a transcript review or other component(s). Any appeals must be adjudicated by the district.

## Policy Requirements

### Development

As described in the regulations, each district is required to develop a CD policy. As detailed above, the policy must include:

- The coursework requirements in each of the required subject areas, including the specific courses the district considers applicable for the purposes of the CD;
- The measure(s) the districts will use to determine whether the student has demonstrated mastery in each of the named subject areas;
- Considerations for students with disabilities and English learners;
- Considerations for late-enrolling students;
- A description of the limited instances in which the district may use MCAS scores to determine competency;
- The process by which a student can appeal the district's decision to award or deny a CD; and
- The process by which a current or former student may request a transcript review (see Appendix C).

### Approval and Dissemination

The district's CD policy must be approved by the district's governing body (i.e., local school committee or board of trustees). Districts must have their policy for the class of 2026 approved no later than October 31, 2025.<sup>3</sup>

Upon approval by the district's governing body, the CD policy must be publicly posted on the district's website along with translated versions to ensure meaningful access for all parents and families. Districts are strongly encouraged to communicate the new CD policy to all families in a manner consistent with other district-wide communications.

### Submission

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<sup>3</sup> Districts that developed a CD policy before the approval of the amended regulations must ensure that their policy aligns with both the process and content requirements described in this guidance. If the existing policy does not meet all required components, the district must develop a new policy in full accordance with the provisions of this document.

The amended regulations require districts to submit their CD policy as well as their local graduation requirements to the Department. Following the local approval of the CD policy, each district must submit both its CD policy and its local graduation requirements in [GEM\\$](#).<sup>4</sup>

Through its submission, the district will be required to certify the following:

- The policy has been approved by the district's governing body;
- The policy has been shared with all students, families/guardians, and district stakeholders; and
- The policy has been made publicly available in multiple languages.

The Department will publish each district's CD policy and local graduation requirements, based on the information provided in GEM\$.

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<sup>4</sup> While the GEM\$ platform is also used for grants management, the CD policy and local graduation requirement submission process is not connected to grant funding.

## Submission Templates

The submission templates below describe key planning steps districts should take and questions districts will answer in GEM\$ when submitting their CD policy and local graduation requirements to the Department.

### Competency Determination Policy Submission Template

<b>Section 1: Competency Determination Requirements</b>
<p>In this section, you will:</p> <ul style="list-style-type: none"><li>• Explain how a student earns full credit and shows mastery in accordance with your district's grading policy.</li><li>• Describe how a student meets the Competency Determination requirements for each content area: English Language Arts, Mathematics, Science, and U.S. History.</li></ul>
<p><b>Submission Questions</b></p> <p>General:</p> <ul style="list-style-type: none"><li>• Satisfactorily completing coursework shall mean a student earns full credit in accordance with the district's grading policy. Describe how a student earns full credit in accordance with the district's grading policy (e.g., course grade above a 70, course grade of meeting or exceeding expectations, etc.).</li><li>• Showing mastery shall mean a student successfully completes in accordance with the district's grading policy: (1) the final assessment for a course; or (2) a capstone or portfolio project; or (3) an equivalent measure identified in the district's Competency Determination policy. Describe how a student shows mastery in accordance with the district's grading policy.</li></ul>
<p>English Language Arts:</p> <ul style="list-style-type: none"><li>• For English Language Arts, the student must: (i) satisfactorily complete coursework in the equivalent of two years of high school English language arts courses. List the local course offerings that your district will certify as meeting the Competency Determination coursework requirement in this content area.</li><li>• Review the skills, competencies, and knowledge that a student must demonstrate mastery of as identified in the relevant Massachusetts curriculum frameworks. Describe how a student will show mastery in English Language Arts.</li></ul>
<p>Mathematics:</p> <ul style="list-style-type: none"><li>• For mathematics, the student must: (i) satisfactorily complete coursework in the equivalent of one year of both Algebra I and Geometry; or (ii) satisfactorily complete coursework in the equivalent of one year of both Integrated Math I and Integrated Math II. List the local course offerings that your district will certify as meeting the Competency Determination coursework requirement in this content area.</li><li>• Review the skills, competencies, and knowledge that a student must demonstrate mastery of as identified in the relevant Massachusetts curriculum frameworks. Describe how a student will show mastery in mathematics.</li></ul>
<p>Science:</p> <ul style="list-style-type: none"><li>• For science, the student must: (i) satisfactorily complete coursework in the equivalent of one year of Biology; or (ii) satisfactorily complete coursework in the equivalent of one year of Physics; or (iii) satisfactorily complete coursework in the equivalent of one year of Chemistry; or (iv) satisfactorily complete coursework in the equivalent of one year of a Technology/Engineering course. List the local course offerings that your district will certify as meeting the Competency Determination coursework requirement in this content area.</li><li>• Review the skills, competencies, and knowledge that a student must demonstrate mastery of as identified in the relevant Massachusetts curriculum frameworks. Describe how a student will show mastery in science.</li></ul>
<p>U.S. History:</p> <ul style="list-style-type: none"><li>• Beginning with the graduating class of 2027, the student must satisfactorily complete coursework in the equivalent of a one-year U.S. History course. List the local course offerings</li></ul>

<p>that your district will certify as meeting the Competency Determination coursework requirement in this content area.</p> <ul style="list-style-type: none"> <li>Review the skills, competencies, and knowledge that a student must demonstrate mastery of as identified in the relevant Massachusetts curriculum frameworks. Describe how a student will show mastery in U.S. History (beginning with the graduating class of 2027).</li> </ul>
<p><b>Section 2: Additional Requirements</b></p>
<p>In this section, you will:</p> <ul style="list-style-type: none"> <li>List any other requirements of your Competency Determination policy in addition to those outlined in Section 1.</li> </ul>
<p><b>Submission Questions</b></p>
<p>In addition to the coursework and mastery requirements outlined in the previous section, please describe any other requirements of your district's Competency Determination policy (learning experiences, coursework, etc.).</p>
<p><b>Section 3: Additional Considerations</b></p>
<p>In this section, you will:</p> <ul style="list-style-type: none"> <li>Provide additional information on the implementation of your Competency Determination policy for specific student groups including students with disabilities, English learners, and late-enrolling students.</li> </ul>
<p><b>Submission Questions</b></p>
<p><b>Students with Disabilities:</b> Describe how your district provides students with disabilities, including Massachusetts students receiving a publicly funded education in an out-of-district day or residential school, equal opportunity to meet the CD requirements, including any specialized supports, modifications, or alternative demonstration methods used as part of the policy.</p>
<p><b>English Learners:</b></p> <ul style="list-style-type: none"> <li>Describe how your district provides English learners equal opportunity to meet the CD requirements, including any specialized supports or considerations.</li> <li>If your district indicated in Section 1 that certain ESL courses meet the ELA coursework requirement of the CD, describe how you will determine which students this may apply to and how grade-appropriate ELA standards are integrated into the ESL courses that you certify as meeting the requirement.</li> </ul>
<p><b>Late-Enrolling Students:</b> Describe how your district will evaluate eligibility for the Competency Determination among late-enrolling students, including the use of transcript reviews, course-taking opportunities, or in limited cases qualifying MCAS score-exception. In your response, explain how your policy ensures compliance with state requirements related to equivalent course length, relevant coursework, and demonstration of mastery.</p>
<p><b>Section 4: Appeals Process</b></p>
<p>In this section, you will:</p> <ul style="list-style-type: none"> <li>Explain your district's appeals process.</li> </ul>
<p><b>Submission Questions</b></p>
<p>Describe the process through which a student or parent/guardian may appeal to the district a district's determination that a student has or has not met the requirements of the Competency Determination. Include timelines, responsible personnel, and how decisions are communicated.</p>
<p><b>Section 5: Diploma Request Process for Previously Enrolled Students</b></p>
<p>In this section, you will:</p> <ul style="list-style-type: none"> <li>Explain your district's process for reviewing requests from previously enrolled students who may be eligible for a diploma</li> </ul>
<p><b>Submission Questions</b></p>
<p>Describe the process through which an eligible student (see eligibility requirements in Appendix B) in the classes of 2003 through 2024 who did not earn a diploma as a result of failing to meet the state's CD requirement has the opportunity to determine their current eligibility for a diploma pursuant to the district's CD requirements. Include timelines, responsible personnel, and how decisions are communicated.</p>

<b>Section 6: Certifications</b>
In this section, you will: <ul style="list-style-type: none"><li>• Complete several certifications regarding the approval and posting of your Competency Determination policy.</li></ul>
<b>Submission Questions</b>
Certify that the policy has been approved by the governing board of the district
Certify that the policy has been shared with all students, families/guardians, and district stakeholders
Certify that the policy has been made publicly available in multiple languages
Provide the URL where your policy is posted on your website

## Local Graduation Requirements Submission Template

<b>Section 1: Credit Requirements</b>
In this section, you will: <ul style="list-style-type: none"><li>• Define what credit means in your district</li><li>• Provide the number of credits required in your local graduation requirements</li></ul>
<b>Submission Questions</b>
What is the definition of a credit for the purposes of your local graduation requirements?
What is the total number of credits required as part of your local graduation requirements?
How many credits are required in each of the following content areas as part of your local graduation requirements? <ul style="list-style-type: none"><li>• English Language Arts</li><li>• Mathematics</li><li>• Science</li><li>• History and Social Science</li><li>• World Language</li><li>• Physical Education</li><li>• Arts</li></ul>
If you require credit completion in courses other than those included above, please list them here.
<b>Section 2: Additional Requirements</b>
In this section, you will: <ul style="list-style-type: none"><li>• Describe any other components of your local graduation requirements.</li></ul>
<b>Submission Questions</b>
Above and beyond the credit requirements outlined in the previous section, please describe any other components of your district's local graduation requirements (i.e., attendance, extracurriculars, community service, capstone project, etc.).

## Appendices

### Appendix A: Audit Policy

As provided in the amended regulations, the Department will implement a system to audit district CD policies and submissions to ensure compliance with state regulations. The audit process may include:

- Review of course descriptions and instructional materials to verify alignment with the Massachusetts curriculum frameworks;
- Examination of district grading policies and definitions of “showing mastery”;
- Sampling of student transcripts and records used to award the CD; and/or
- Assessment of the district’s use of exceptions, such as MCAS scores or substitute equivalents.

Districts found to be out of compliance may be required to take corrective action and resubmit policy materials.

### Appendix B: Diploma Requests for Previously Enrolled Students

Districts must offer eligible students in the classes of 2003 through 2024 who did not earn a diploma as a result of failing to meet the state’s CD requirement an opportunity to determine their current eligibility for a diploma pursuant to the district’s CD requirements.

An eligible student is one who:

1. Was previously enrolled in the district; and
2. Previously met the criteria for a Certificate of Attainment<sup>5</sup> (i.e., they met local graduation requirements but did not receive a high school diploma because they did not earn a CD); and
3. Was not previously reported as a graduate in any district’s Student Information Management System (SIMS) submission.

Any student who has not previously met the criteria for a Certificate of Attainment (indicating that they did not meet all local graduation requirements when they exited high school) must meet the district’s current CD requirements and local graduation requirements in order to earn a diploma.

All graduates must be reported to the Department via SIMS. Additional guidance is available on the Department’s [Data Collection website](#).

### Appendix C: Aligned Courses

The Department has developed a list of courses, identified by Student Course Schedule (SCS) code, that may be aligned with the coursework requirements outlined in the CD regulations. The list of courses is available in a [file on our website](#). The final determination of which courses are certified to meet the coursework requirements remains with the district. Note that while the CD policy must address the skills, competencies, and knowledge contained in the state academic

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<sup>5</sup> Students meeting this criterion were previously reported in SIMS DOE012 (Reason for Reporting) as either ‘10’ – *Certificate of Attainment* or ‘11’ – *Completed grade 12 and district-approved program (District does not offer a Certificate of Attainment)*.

standards and curriculum frameworks through grade 10, the courses may be taken at any point, as described in Table 1 above.