

June 21, 2022

By email

Dear Commissioner Riley,

Thank you for sending your June 17 response to the Systemic Improvement Plan for the Boston Public Schools (BPS). We appreciate your team working with urgency to reach an agreement.

As you know, the City and BPS have accepted nearly all of the commitments contained in your original May 20 proposal across all eight scopes proposed by DESE. These areas of improvement, all agreed to by the City and BPS, include commitments related to School Safety, Special Education, Transportation, Facilities, English Learners, Transformation Schools, Data, and Accountability.

To reach agreement, we believe we need further discussion in three areas:

**Timeline for Systemic Reforms:** The DESE follow-up review calls for deep structural reforms across core areas of BPS academic programs and operations, particularly the delivery of special education, instruction and services for English learners, transportation and data. BPS and the City are committed to starting immediately to make needed improvements, including through tangible action steps this summer. Some of these commitments include:

- By August 15, 2022, engage an entity or team of individuals mutually agreed upon between Boston/BPS and DESE who have a proven track record of success working in urban school districts and who will work with a sense of urgency on improving special education services. The entity or team will meet with the Special Education Parent Advisory Council and other stakeholders, and will make a set of recommendations to the Superintendent.
- By August 15, 2022, develop an updated policy and procedure manual on special education. BPS will train staff on effective implementation of the policies and procedures as part of the professional development provided at the beginning of the 2022-2023 school year.
- By August 15, 2022, develop a system to ensure that all English learners, including English learners with disabilities, receive all appropriate instruction and appropriate access to grade level content instruction. This should include a process for monitoring the quality of ESL and content instruction for English learners, across program models (SEI, dual language, newcomer, etc.).
- By August 15, 2022, finalize the BPS Strategic Plan for Multilingual Learners that outlines steps for expanding access to native language instruction and literacy, including for students with disabilities. The Plan shall include specific action steps related to bilingual, dual and heritage language, Sheltered English Immersion, and English as a Second Language programming. We will be able to present the plan to the School Committee in the fall.
- Starting at the return to school in September, achieve a district-wide school bus on-time arrival rate of 95% each month. The on-time arrival rate includes all scheduled bus routes.

Notwithstanding these significant commitments, many of which must be accomplished within seven weeks, DESE continues to insist on additional accelerated timelines for other elements of

the plan. Several would require the District to execute rushed and flawed processes that would also limit the opportunity for community and family engagement. With a new Superintendent coming on board, we must set urgent and actionable work plans that set the district up for success, rather than impose unrealistic deadlines that do not support systemic reform.

**Independent Data Auditor:** The City and BPS have already agreed to hire an independent data auditor, approved by DESE, to engage in review of data quality and reporting. We are committed to working with DESE to mutually agree upon a scope of work that ensures BPS data quality and the integrity of data reporting practices, particularly those that impact timely and accurate state reporting. We have further agreed to provide workspace for the independent auditor inside BPS. We believe this meets and exceeds DESE's stated goal of third-party access and stakeholder confidence without imposing a version of top-down control that would constitute a form of receivership.

**Structure:** We believe that ensuring all students have access to an excellent public education is a shared responsibility of school districts, municipalities and the state. We are disappointed that DESE's proposed structure for the Systemic Improvement Plan and the limited commitments expressed in your separate letter do not reflect the partnership we had proposed, and which we believe would best support our students.

We will reach out to schedule a meeting later this week in hopes of narrowing the issues on the table and reaching agreement.

Sincerely,

Michelle Wu  
Mayor, City of Boston

Geraldine Robinson  
Chair, Boston School Committee

Brenda Cassellius  
Superintendent, Boston Public Schools