# MEMORANDUM

**To:** Members of the Board of Elementary and Secondary Education

**From**: Russell D. Johnston, Acting Commissioner

**Date**: May 15, 2024

**Subject**: Report on the Boston Public Schools’ Systemic Improvement Plan

At the meeting of the Board of Elementary and Secondary Education (Board) on May 21, 2024, the Chair of the Boston School Committee, Jeri Robinson, and the Superintendent of Boston Public Schools (BPS or District), Mary Skipper, will provide an update on BPS’s progress on its Systemic Improvement Plan (SIP).

This memorandum provides information regarding areas of progress and areas for improvement organized by each key area of the SIP.

**Background**

The Massachusetts Department of Elementary and Secondary Education (DESE) released a district review report of BPS in May 2022, following up on the previous report released in March 2020. DESE uses district review reports to support local school districts in establishing or strengthening a continuous improvement cycle. District reviews identify systems and practices that may impede improvement in each district reviewed. DESE also uses these reports to identify resources and technical assistance for the district.

While the May 2022 district review report noted that BPS had made some progress since March 2020, key findings included significant, persistent challenges in BPS. The City of Boston (City) and BPS agreed to immediately address systemic barriers to educational opportunity, build the operational capacity to implement systemic change, and support Boston’s most vulnerable students – including students with disabilities and English learners – in achieving their full potential.

In June 2022, the City and BPS agreed to the SIP[[1]](#footnote-2) that was accepted by DESE. The SIP is in effect through June 30, 2025. DESE committed to providing targeted financial support and other technical assistance to the District to support these efforts.

The first year of the plan (2022-2023 school year) laid out many technical and operational benchmarks (e.g., commissioning audits and reports, hiring for key positions, reporting specific data to DESE, launching working groups, developing plans, etc.). While many of these initial benchmarks were met, implementation of systemic improvement remains uneven with advances in some areas and delays and challenges in others. This memo provides a summary of the progress the District has made with each of the areas included in the SIP as the District concludes its second year of implementation.

**Student Safety**

In the SIP, BPS, the City, and the BPS School Committee agreed to the following commitments*:*

* *Begin using an improved, robust system for managing, responding to, and resolving complaints from parents and guardians.*
* *Respond in a timely manner to complaints received from DESE’s Problem Resolution System (PRS).*
* *Commission an independent student and staff safety audit to assess safety protocols at schools and make recommendations to ensure safe learning environments for all students.*
* *Hire a coordinator of Problem Resolution.*

BPS created an improved system for managing, responding to, and resolving complaints from parents and guardians. The District has hired additional staff dedicated to addressing PRS complaints. DESE provided training to these new staff members to support their onboarding and provided feedback on internal processes. BPS trained its school-level staff on this system in the fall of 2023. Overall, the District has shown some improvement in its investigation of and responses to PRS complaints. Improvement has been steadier over the past few months compared to earlier in this process. However, DESE continues to have concerns about timeliness and thoroughness of BPS’s responses.

In July 2022, BPS commissioned an independent student and safety audit. The final report was released in January 2023. In response to recommendations in the safety audit, BPS created a new Office of Emergency Management to implement several recommendations from the report, including improved communication with families and school-level training on safety procedures. BPS has developed a plan to train all school leaders in updated safety protocols and make necessary upgrades to facilities. DESE has urged the District to ensure there is adequate capacity at the central office level to provide comprehensive training and ensure all schools are following set protocols. The District still does not have a current MOU with the Boston Police Department as recommended by the safety report.

**Special Education**

In the SIP, BPS, the City, and the BPS School Committee agreed to undertake a deep redesign of BPS special education services, with policies, procedures, and training to ensure that all students learn in the least restrictive environment. Specific commitments included*:*

* *Contract with an entity with a proven track record in special education to make a set of recommendations for improvement.*
* *Develop an updated policy and procedure manual on special education and train staff on effective implementation.*
* *Engage a McKinley Schools Working Group to implement the recommendations of the McKinley Schools intervention team.*
* *Post new positions for senior leadership team with demonstrated expertise in special education and system changes in urban education.*
* *Release and begin to implement a district-wide inclusion policy to ensure students are educated in the least restrictive environment and that there is a full continuum of services available for all students. The policy will include short-term objectives, a timeline for implementation, addressing Central Office operational challenges, enrollment and budget processes, specific models for high-quality and inclusive education, and professional development and staff training.*

In the SIP, BPS committed to releasing and implementing a district-wide Inclusion Plan to ensure that students are educated in the least restrictive environment. This plan was due by November 1, 2022. BPS submitted its Inclusive Education Plan to DESE on October 2, 2023. This document represents a comprehensive vision for inclusion that is intended to dismantle many of the substantially separate placements within the District that disproportionately serve male students of color. This plan includes a five-year timeline for inclusion across grades and identifies specific systemic actions for the current school year to prepare for the initial implementation year of 2024-2025. As set forth in the Inclusive Education Plan, BPS will begin implementing structural changes in grades K0, K1, K2, 7, and 9 in 2024-2025. DESE recommended that the District prioritize developing robust support for schools to make these systemic changes and identify implementation benchmarks.

The District convened a McKinley (now Mel King Academy) School Working Group in the fall of 2022. Although the intent of the working group, as defined by the SIP, was to implement the recommendations from the McKinley Schools intervention team, the culmination of the working group’s efforts was a revised entrance and exit criteria document that defines the services the Mel King Academy provides and outlines the steps a sending school should take before recommending a placement at the school.

**Transportation**

In the SIP, BPS, the City, and the BPS School Committee agreed to the following commitments:

* *Implement operational reforms negotiated between BPS and the school bus drivers’ union.*
* *Achieve a district-wide school bus on-time arrival rate of 95% or better each month and 99% of buses arrive within 15 minutes of the start of the school day, and report all arrival rates to DESE monthly.*
* *Launch a diagnostic evaluation of the current BPS transportation system to analyze efficiency, performance, equity, and cost.*

There has been some progress in transportation services for students, but the overall benchmark as required by the SIP has not been achieved. The district has implemented the operational reforms negotiated between BPS and the school bus drivers’ union and made progress in hiring drivers and monitors for the start of the 2023-2024 school year. Additionally, a diagnostic evaluation of the current BPS transportation system was conducted in September 2022. The District is also in the process of improving its special education transportation services to address the individual and systemic deficiencies identified by DESE in response to a complaint. Pursuant to the letter of finding by the Problem Resolution System dated February 24, 2023, the District has submitted a proposed plan to address the deficiencies and is working with DESE to refine and implement it￼

While the District has not yet met the on-time arrival target of 95 percent, there was an improvement in on-time arrivals from 76.4 percent in September 2022 to 89.3 percent in June 2023. However, through March 2024, the on-time arrival rate is 87.8 percent for the 2023-24 school year. The on-time arrival rate for each month during the 2022-2023 school year and 2023-2024 school year to date can be found in the BPS On-Time Performance Data Reporting memos in Attachment A.

DESE and BPS have also agreed to track the on-time performance of the afternoon buses. Afternoon on-time performance improved from 73.4 percent in September 2022 to 85.7 percent in June 2023. Through March 2024, the afternoon on-time performance rate is 84.9 percent for the 2023-24 school year.

**Facilities**

In the SIP, BPS, the City, and the BPS School Committee agreed to the following commitments*:*

* *Renovate student facilities in at least fifteen schools.*
* *Create and implement a coherent preventive/deferred maintenance plan.*
* *Create and implement a comprehensive, long-term master facilities plan.*

BPS committed to renovating at least fifteen student bathrooms by June 2023. In August 2022, to account for potential supply chain challenges, the District presented a timeline that projected the completion of bathroom renovations in 16 schools in December 2023. On September 13, 2022, DESE reiterated the expectations set out in the SIP, noting the revised timeline fell outside of the SIP deadline. Monthly meetings and written communications between DESE and BPS articulate continued timeline adjustments and DESE’s concern with the continued delays. As reported by BPS in a March 2024 memo, student bathroom renovations in fourteen schools were completed between September and December 2023. The completion of the work in two additional schools is still delayed due to various construction-related challenges. Despite the continued delays in the completion timelines, the renovations that have been completed in student bathrooms are a facility upgrade in those schools.

The District committed to developing and implementing a long-term master facility plan, which was submitted to DESE on December 29, 2023. This document included a Facilities Condition Assessment, a decision-making rubric, community engagement resulting in a definition of a high-quality student experience, and the development of the Model Space Summary. This plan represents a positive step forward in the District’s intention for every student to have access to school buildings that support an improved student experience. As DESE communicated to the District in a letter on January 17, 2024, there were elements of the plan that were expected but not included. The Plan does not include future student enrollment projections, which is a vital component to inform future large-scale renovations, mergers, and closures. Additionally, the Plan lacks specific information on an overall timeline by which rightsizing the District will be complete as well as the size and number of buildings needed in the future state.

**Multilingual Learners**

In the SIP, BPS, the City, and the BPS School Committee agreed to the following commitments:

* *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.*
* *Complete 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.*
* *Report compliance levels of the City’s successor agreement with the U.S. Department of Justice.*

BPS created a Strategic Plan for Multilingual Learners, which focused on the expansion of bilingual programming across the District and shared it with DESE in August 2022. Members of the DESE team provided feedback on that plan in several meetings and in a letter dated August 29, 2022. Many of the milestones set in that plan were not met by BPS during the 2022-2023 school year. The District’s Office of Multicultural and Multilingual Education (OMME) experienced significant turnover in the 2022-2023 school year and multiple senior leadership positions within the office remained vacant through the 2022-2023 school year. In summer 2023 the office filled two Deputy-chief level positions and hired a Chief in January 2024.

Apart from the SIP, in July 2023, DESE released the findings of a Tiered Focused Monitoring (TFM) review of BPS’s programming for English learners (ELs).The report included findings related to the appropriate identification of ELs, that students with disabilities who are also ELs were not receiving appropriate English as a Second Language (ESL) services or equitable access to existing bilingual programs, and that in many contexts, ELs were not given equitable access to grade-level content or the same variety of learning opportunities as English-proficient peers.

As part of the TFM process, districts are required to create and submit a Continuous Improvement and Monitoring Plan, detailing how they will address the findings of the TFM report. BPS submitted its plan in August 2023; DESE approved some but not all aspects of this plan. DESE set up ongoing monitoring checkpoints throughout the 2023-2024 school year to monitor the District’s implementation of the plan. In October 2023, again in November 2023, and then again in January 2024, the District notified DESE of its intent to make significant changes in the programmatic models proposed in its Continuous Improvement and Monitoring Plan. DESE provided feedback on these proposed changes, requested additional detail on these plans and the stakeholder engagement undertaken by the District to develop the plans, and communicated concerns about the clarity of the plans. In March 2024, DESE shared questions about the District’s plan for English Learner Education (ELE) programming in 2024-25, including how they will communicate expectations for this programming to school leaders and school communities, as well as the district’s intentions for expanding new ELE program models in the future.

BPS revised the OMME Strategic Plan in August 2023, in alignment with its Continuous Improvement and Monitoring Plan. DESE provided feedback on this plan in conjunction with its feedback on other documents submitted this fall and winter. Although not required by the SIP, the District included information about its plans for ELE programming in its Inclusion Plan (*see infra* pp. 2-3). DESE has provided feedback on the Inclusion Plan consistent with the feedback detailed above and on the plan’s alignment with DESE guidance. DESE has also provided feedback on 19 new program proposals the district submitted on January 1, 2024. Many of these proposals did not meet criteria for approval to open in 2024-25, so DESE has provided corrective action plans for 17 of the 19 proposals. At this time, the District intends to open two of the original 19 proposed programs in fall 2024– one expands an existing dual language education program to additional grades for 2024-25 and the other will open a transitional bilingual education program for students with limited or interrupted formal education. DESE will continue to work with the District as they complete corrective action to strengthen the remaining 17 proposals for potential expansion in future years.

**Transformation Schools**
In the SIP, BPS, the City, and the BPS School Committee agreed to the following commitments:

* *Produce an equity analysis on funding for Transformation Schools compared to non-Transformation Schools and implement a plan to equitably fund its lowest performing schools starting in FY2024.*
* *Consolidate the number of plans required for Transformation Schools into one clearly articulated, robust, evidence-based Quality School Plan (QSP).*
* *Provide quarterly briefings to the School Committee and DESE on the monitoring of the QSPs at each school.*

The District has devoted resources and systems to support school improvement. Starting in fall 2022, BPS revised its Regional Support model to clarify the roles of central office staff and make the central office easier for schools to navigate. School leaders within the BPS regions began to come together monthly for professional learning and engage in regular instructional walk-throughs using a common, district-developed observation tool. BPS Transformation Schools now produce a single comprehensive, evidence-based Quality School Plan (QSP) that is consistently utilized across schools as a driver of school improvement. The plans reflect the District’s focus on ensuring that schools are using high-quality instructional materials and require schools to name their curriculum in the four content areas at each grade span; other components of the plan require schools to name commitments to improving climate and culture, as well as attendance. The District shared these plans with DESE staff and incorporated feedback received, and they have provided quarterly briefings to DESE staff on data collected from Transformation Schools in alignment with the QSPs.

BPS engaged vendors to conduct an audit and develop recommendations for equitable funding and support for Transformation Schools. While the District is implementing many of those recommendations, some high-leverage recommendations that may address root causes of underperformance at these schools are not yet implemented – for example, reevaluating enrollment patterns and the concentration of specialized programming within these schools and creating spending flexibility for Transformation School leaders. DESE provided detailed feedback on BPS’s plan to support Transformation Schools aligned to the recommendations in the audit, in a letter from DESE to the district dated June 21, 2023.

**Data**

In the SIP, BPS, the City, and the BPS School Committee agreed to the following commitments:

* *Cooperate in an independent audit of academic and operational data functions.*
* *Develop revised student withdrawal procedures.*
* *Launch a Data Working Group charged with monitoring data quality.*

In the priority area of data, the City and BPS committed to the implementation of systems and internal controls at the central office and school levels that will ensure transparency and accurate data reporting. To that end, in August 2022, DESE hired EY-Parthenon to conduct an independent review of source data, documentation, and processes related to data certified by BPS through DESE’s data collection systems, relating to transportation services, facilities, student assignment, and internal BPS complaints concerning student safety and bullying.

The Data Assessment Report, released in February 2023,[[2]](#footnote-3) identified challenges that affected BPS’s data quality, accuracy, and completeness and included specific recommendations for improvement. The District reiterated its commitment to use the data assessment report and recommendations to implement urgent corrective actions. For example, about findings related to high school student withdrawal procedures, the District developed updated guidance and processes for withdrawal and committed to quarterly internal audits to review documentation procedures. In response to issues related to the quality of student restraint data, the District undertook further staff training and conducted additional cross-validations of restraint data. EY-Parthenon is continuing its work with BPS this year, focusing primarily on helping the District build its risk management and internal audit program as well as developing a data strategy.

The District should be commended for its efforts to improve the quality of data provided to DESE since the development of the SIP, specifically in three areas. First, the District and DESE have agreed upon a methodology for reporting on the on-time performance of bus routes in both the morning and afternoon. While the performance results are discussed above, the methodology used to report the percentage of routes arriving and departing on-time has been applied consistently including accurate reporting of uncovered routes in the calculation. Second, the EY-Parthenon report found significant discrepancies in the reporting to DESE of student transfers, and the District has improved its reporting of transfers and dropouts in the 2022-23 school year. Lastly, the District took significant steps to align reporting between school and district systems and what is reported to DESE on the use of restraints on students. The work that has been done gives DESE confidence that the data presented will be more accurate and complete as compared to previous years.

**Accountability**

In the SIP, BPS, the City, and the School Committee agreed to the following commitments:

* *Mayor Wu, the City of Boston, and BPS will make regular reports on the matters outlined in this Systemic Improvement Plan to the Boston School Committee, and to the Boston community.*
* *The City of Boston, BPS, and DESE will engage in a collaborative process to set any additional outcome metrics for the Systemic Improvement Plan.*
* *The Mayor of the City of Boston, BPS School Committee Chair, BPS Superintendent, and the Commissioner of Elementary and Secondary Education, or their designees, will meet monthly during the first year of this plan and every other month during subsequent years to discuss the priority initiatives.*
* *BPS will continue to work in collaboration with DESE on developing a Performance Management System for all BPS schools.*

The District has made reports on its implementation of the SIP to the School Committee, most recently on November 15, 2023. Designees of the Mayor meet monthly with Acting Commissioner Johnston and Superintendent Skipper and their teams to talk through matters relating to the SIP. Finally, the District collaborated with DESE and an external partner to create a performance management system. BPS’s system defines a set of universal expectations for schools and correlated specific supports for schools in identified areas for improvement.

DESE and BPS have collaboratively identified additional outcome metrics related to the SIP. On March 8, 2024, BPS submitted a report detailing the benchmarks towards those outcomes.

During the meeting, Board members will hear a brief presentation from DESE and BPS senior leadership highlighting progress and next steps related to the Systemic Improvement Plan and have the opportunity to ask questions.

1. The BPS Systemic Improvement Plan can be found on the DESE website: <https://www.doe.mass.edu/sip/> [↑](#footnote-ref-2)
2. The Data Assessment Report and Recommendations can be found on the BPS SIP page of the DESE website: <https://www.doe.mass.edu/sip/>. The report was presented during the regular meeting of the Board of Elementary and Secondary Education on February 28, 2023. [↑](#footnote-ref-3)