



## Boston Preparatory Charter Public School

### SY26 Governance Committee Meeting #2

Published on December 1, 2025 at 4:14 PM EST

Amended on December 1, 2025 at 4:38 PM EST

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#### Date and Time

星期三 十二月 3, 2025 at 3:30 下午 EST

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#### Agenda

	Purpose	Presenter	Time
<b>I. Opening Items</b>			<b>3:30 PM</b>
<b>A.</b> Record Attendance		Sarah James	1 m
<b>B.</b> Call the Meeting to Order		Sarah James	1 m
<b>C.</b> Approve Minutes	Approve Minutes	Sarah James	1 m

	Purpose	Presenter	Time
Approve minutes for SY26 Governance Committee Meeting #1 on September 22, 2025			
<b>II. Board Planning</b>			<b>3:33 PM</b>
<b>A.</b> Dec 12 Board of Trustee Meeting Agenda Overview	Discuss	Sarah James	15 m
<b>B.</b> New Trustee Recruitment	Discuss	Sarah James	10 m
<b>C.</b> Human Capital Update	Discuss	Lovette Curry	10 m
<b>III. Governance</b>			<b>4:08 PM</b>
<b>A.</b> Policy Updates Title IX and Competency Determination & Graduation Requirements Update	Discuss	Meekerley Sanon	2 m
<b>B.</b> Grade Span Update	Discuss	Meekerley Sanon	5 m
<b>IV. ED Evaluation Update</b>			<b>4:15 PM</b>
<b>A.</b> SY25 Updates w/ MCAS	Discuss	Sarah James	5 m
<b>B.</b> SY26 Update	Discuss	Sarah James	5 m
<b>V. Board Project Planning Overview</b>			<b>4:25 PM</b>
<b>A.</b> Board Systems & Processes Refresh <a href="#">Project Plan</a>	Discuss	Meekerley Sanon	5 m
<b>VI. Closing Items</b>			<b>4:30 PM</b>
<b>A.</b> Adjourn Meeting	Vote	Sarah James	1 m

# Coversheet

## Approve Minutes

**Section:** I. Opening Items  
**Item:** C. Approve Minutes  
**Purpose:** Approve Minutes  
**Submitted by:**  
**Related Material:**  
Minutes for SY26 Governance Committee Meeting #1 on September 22, 2025

APPROVED



BOSTON PREP

## Boston Preparatory Charter Public School

### Minutes

#### SY26 Governance Committee Meeting #1

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##### **Date and Time**

Monday September 22, 2025 at 11:00 AM

##### **Location**

<https://bostonprep-org.zoom.us/j/7171526696>

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##### **Committee Members Present**

B. Jones (remote), C. Newton (remote), J. Johnson (remote), K. Borchert (remote), M. Gametchu (remote), S. James (remote)

##### **Committee Members Absent**

None

##### **Guests Present**

L. Jewell (remote), M. Sanon (remote)

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## I. Opening Items

### A. Record Attendance

### B. Call the Meeting to Order

S. James called a meeting of the Governance Committee of Boston Preparatory Charter Public School to order on Monday Sep 22, 2025 at 11:03 AM.

### C. Approve Minutes

J. Johnson made a motion to approve the minutes from Governance Committee Meeting #6 on 06-03-25.

C. Newton seconded the motion.

The committee **VOTED** unanimously to approve the motion.

#### Roll Call

C. Newton	Aye
J. Johnson	Aye
B. Jones	Aye
S. James	Aye
K. Borchert	Aye
M. Gametchu	Aye

### D. Welcome and Purpose

Opened up the meeting by explaining that we are focused on solidifying board goals, how the work is getting done, how the Board Scope and Sequence is going to work, we have a question about sub committees that we may want to roll out. We are thinking this year with all the work that needs to get done that sub committees will be helpful. As well as, our planning for bringing in new trustees at the end of the year, and the family, alumni, and One Team Trustees.

## II. SY26 Board Goals

### A. Review draft Board Goals Matrix below (with goals, lead committees, and success measures)

- Question: are there people who could support with the subcommittees? Do we just do it all together?
- Check on: do they have to be just on the subcommittees? They don't need to go through OML
- Governance should be the lead of the committees
- Are we ok with the idea of subcommittees and are we ok with presenting them to the broader board?

- Discussed that Persistence needs to be mentioned in this Board Matrix, and questioned that the budget should the budget goal be specific or more general about financial health of the goal- more clean to just say Budget is meet. Budget health and codify the steps that need to be taken when financial health is not being met
- Development board goals: 100% trustees giving, make development goal, raise 1.5 million and 100% trustee giving, we are going to update, parse it out into how board engagement will look

#### **B. Confirm Governance's recommendations to the full board**

Discussed what specifically should be written for committee goals so that things are codified but leave flexibility for school team to strategically meet the necessary goals

#### **C. Clarify handoffs: which committees own which goals**

### **III. Framing the Work for the Year**

#### **A. Review board scope & sequence (strategic questions driving each meeting)**

Recapped the plan for how the board is going to scope out the year. And there will be driving questions for each meeting to keep the board on track to meet all the metrics. The school team will be using the board dashboard to help us along with these meetings as well.

#### **B. Decide cadence of Governance prep/debriefs before/after full board meetings**

This year Governance Chair and Board Chair are meeting every other week, and focused these conversations on big picture Governance things. And during these times they will come up with a rough draft of board meeting agendas. Then after the board meetings, there we debrief calls to discuss how the meetings went. Discussed whether this feels like the right cadence to prep for board meetings.

One option, is that the debrief happens in the weekly meetings with Governance Chair, Board Chair, and any governance committee members can join? Or, should these debriefs happening in governance committee meeting sessions?

School team is always open to feedback, by joining these calls, or sending feedback emails after the calls.

### **IV. Subcommittee Structure**

#### **A. Review Proposed Subcommittees**

There are high level questions that need to be worked through in governance, but there is a lot of work in terms of ED eval, succession planning, manual creation that must be done. To get all things done in meaningful ways we would like to start subcommittees for the bulk of work can get done outside of main governance meetings.

There are certain things that need to be addressed in governance to get processes started, and subcommittees will open up some of the time for this.

## **B. Discuss Scope, Membership, and Next Steps**

- For Subcommittees: we will want to recruit new people to work on the subcommittees
- Who would like to help with the subcommittees:
  - ED Eval: Sarah will do ED Eval with, Bryant volunteered to support with ED eval
  - Manuals/Protocols: Josh Johnson, Kim Borchert
  - Succession Planning:
- Questions discussed: can Manuals/Protocols/Succession planning be the same committee?
- Sarah will follow up about specific subcommittee assignments
- For ED Eval, that should only be governance.
- 3 or 4 people in the other committees feels like the right number

## **V. Enrollment & Financial Oversight: Framing for Finance**

### **A. Update on Current Enrollment and Budget**

School team discussed a variety of scenarios to handle the low enrollment numbers, and making sure that there is a plan to adjust our budgets. The school is currently under 20 under enrollment, but this changes every day and the team is taking extreme efforts to increase enrollment.

On September 30th we submit our first DESE report to know how short we are in terms of where our funding will be for the year.

### **B. Confirm Governance's Role**

Need to decide where there conversations around this needs to happen? Finance committee will give recommendations, but where do the broader conversations with the board live? Need to figure out where the foundation comes into these decisions. Finance should be flushing out what the options are, but it is very cross functional. We submit the first report on October 1st, we meet on October 3rd, we can recap what was discussed in finance committee and the report, so we can turn this over quickly.

Also what to make sure there is the discussion around why we are 20 people short. School team is working on the debrief on how we got there. This picture will be painted for the finance committee.

**C. Discuss how Governance's Involvement**

**VI. Trustee Recruitment & Onboarding**

**A. Update on Alumni, Family, and One Team Trustee Candidate Pipeline**

Quick update on recruitment and onboarding, at the end of this year Claire and Sarah will be rolling off. We received applications from One Team, 5 individuals are interested in becoming trustee. Voting is happening this week. Then they will be recommended to the Board. Additionally, similar process happened with family trustees. Families will also be electing a family trustee. We also met with an prospective alumni trustee, who we are going to onboard on a committee and young professionals. And we are excited to bring his perspective to the board.

**B. Clarify Governance's Next Steps**

**VII. Closing Items**

**A. Summarize Decisions Made**

**B. Assign Owners & Deadlines**

**C. Confirm Next Governance Meeting Date**

**D. Adjourn Meeting**

There being no further business to be transacted, and upon motion duly made, seconded and approved, the meeting was adjourned at 12:01 PM.

Respectfully Submitted,  
S. James



# Coversheet

## Dec 12 Board of Trustee Meeting Agenda Overview

<b>Section:</b>	II. Board Planning
<b>Item:</b>	A. Dec 12 Board of Trustee Meeting Agenda Overview
<b>Purpose:</b>	Discuss
<b>Submitted by:</b>	
<b>Related Material:</b>	2025_12_12_board_meeting_agenda (1).pdf



Boston Preparatory Charter Public School

**SY26 Board of Trustees Meeting #2**

**Date and Time**

Friday December 12, 2025 at 8:00 AM EST

**Location**

<https://bostonprep-org.zoom.us/j/7171526696> OR Boston Prep RM 147 Fordham (Hybrid)

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**Agenda**

	Purpose	Presenter	Time
I.	Opening Items		8:00 AM
A.	Record Attendance	Kim Borchert	1 m
B.	Call the Meeting to Order	Kim Borchert	1 m

	Purpose	Presenter	Time
<b>II. Consent Agenda</b>			<b>8:02 AM</b>
<b>A.</b> Approve Minutes	Approve Minutes	Kim Borchert	1 m
Approve minutes for SY26 Board of Trustees Meeting #1 on October 3, 2025			
<b>B.</b> Policy Approval	Vote	Kim Borchert	1 m
Title IX and Competency Determination & Graduation Requirements			
<b>C.</b> Committee Memos	Discuss	Kim Borchert	1 m
Finance Committee Memo on Enrollment, Outcomes Memo on MCAS, Governance Memo on ED Evaluation & New Trustees, Development Memo on Events			
<b>D.</b> ED Memo: Progress on Strategic Board Metrics			
<b>III. Outcomes/ED Update</b>			<b>8:05 AM</b>
Driving Question: Are we ensuring every student has the literacy skills needed for college and beyond?			
<b>A.</b> SY25 MCAS Performance and SY26 Goal Setting	Discuss	Meekerley Sanon	40 m
<b>IV. Governance</b>			<b>8:45 AM</b>
<b>A.</b> Executive Director Evaluation	FYI	Sarah James	5 m
<ul style="list-style-type: none"> <li>• SY25 ED Evaluation Finalized</li> <li>• SY26 ED Evaluation Process</li> <li>• ED Contract Process Overview</li> </ul>			
<b>B.</b> Board Project Planning	Discuss	Sarah James	5 m
<b>V. Finance</b>			<b>8:55 AM</b>
<b>A.</b> Human Capital Progress	Discuss	Meekerley Sanon	10 m
<b>B.</b> SY26 Enrollment Update	Discuss	Tyler Martin	10 m
<b>C.</b> FY27 Budget Planning	Discuss	Tyler Martin	10 m

	Purpose	Presenter	Time
<b>VI. Development</b>			<b>9:25 AM</b>
A. FY26 Progress	FYI	Lily Jewell	2 m
B. Call to Action	FYI	Lily Jewell	1 m
<b>VII. Closing Items</b>			<b>9:28 AM</b>
A. Adjourn Meeting	Vote	Kim Borchert	1 m

# Coversheet

## New Trustee Recruitment

<b>Section:</b>	II. Board Planning
<b>Item:</b>	B. New Trustee Recruitment
<b>Purpose:</b>	Discuss
<b>Submitted by:</b>	
<b>Related Material:</b>	SY26 Boston Prep New Trustees (3).pdf



### **SY26 Boston Prep New Trustees**

*We will vote to appoint the following individuals as new trustees. These individuals were elected by their peers to represent **Boston Prep's One Team and Families** in their respective trustee roles.*

#### **One Team Trustee**

**Vanessa Centeio**

#### **Biography:**

My name is Vanessa Centeio, and I was born and raised in Boston, Massachusetts. I am a first generation American and college student who has personally experienced how education can open doors. Growing up as a METCO student, I was bussed out of my neighborhood to receive a more rigorous education, and that experience taught me how life-changing access to a strong education can be. It's also why I care so deeply about making sure Black and Brown students right here in our community have access to an equitable, rigorous education themselves. I've been lucky to serve Boston Prep in many different roles, and I believe strongly in our mission to prepare students to succeed in four-year college and to grow as ethical leaders for the future.

#### **Why I want to serve as the One Team Trustee Board member:**

I have served Boston Prep in a multitude of roles. From teacher to a Curriculum Manager and instructional coach, my commitment to Boston Prep has not waived, in fact it has only strengthened my belief and commitment to our mission. I have made deep connections with staff throughout the years, and committed to hearing and validating their voices through my roles as DEI coordinator and Grade Level Lead, as well as being a voice for our most vulnerable stakeholders-our students. I have served as a Student Senate advisor, Step team Coach, Yearbook Club advisor and created the Women Who Empower club in hopes to create a safe space and bring joy to the community. As a One Team Trustee board member I hope to use my voice and collaborative mindset to positively impact our community and ensure that every student receives the education they not only need, but also deserve.





## **Katheline LeConte**

### **Bio:**

My name is Katheline and I am the director of Mental Health Counseling here at Boston Prep and this is my third year in this amazing community. I'm a Haitian American licensed social worker, a practicing certified birth doula, a mother, a wife, and a voice. When I say a voice, I mean for all. My life's work no matter what I am doing - is driven in advocacy, supporting others, and being a shoulder to lean on. I believe deeply in creating space where every voice carries weight.

### **Why am I interested in serving as a Boston Prep Trustee?**

I am interested in serving as a board trustee because I believe my perspective as a clinician can help strengthen our school's commitment to student well-being, equity, and success. I want to contribute to shaping decisions that support both academic excellence and the holistic needs of our community. I love being a part of the BP community and I feel I can further bring forward One Team's voice at the board table.





### **Family Trustee**

#### **Jeanette Nobles**

##### **Bio:**

I was born in Barbados, West Indies, but have lived in Boston for the majority of my life. I am a graduate of Boston Latin Academy and earned a Bachelor of Arts in Political Science from Emmanuel College and a Masters of Business Administration from Bryant University. Currently, I am a Director, Legal Product Management at Fidelity Investments. Being of service is very important to me, most Sunday afternoons I volunteer with Roslindale Food Collective, a non-profit aiming to reduce food waste and combat food insecurity. I am also serving as a mentor to a first generation college student through Fidelity Scholars and have volunteered with Project Citizenship helping immigrants complete citizenship applications.

##### **Why do I want to be a Boston Prep Trustee?**

My husband and I chose Boston Prep to educate our sons because we wanted a high achieving school in our community where they would be more than just a student ID on a roster. We believe in Boston Prep's mission and have first hand experience in its success, as our older son, class of 2022, is on track to graduate from college in May 2026. During our sons' time at Boston Prep, I have actively participated in the Family Committee, working to build community and bridge communication with school administrators. I also participated in a group panel with other parents as part of an accreditation process. Serving as a Parent Trustee is an opportunity for me to build on my involvement and help further contribute to the long-term success of Boston Prep.







### External Trustee

#### **Sari Laberis**

**Bio:** Sari Fromson Laberis is the Executive Operations Director, Sales at Curriculum Associates, where she drives cross-functional operational efficiency by building company-wide playbooks and communication frameworks that align executive vision with on-the-ground execution. In this role, she partners with senior leaders as a strategic advisor, synthesizing data, KPIs, and business insights to guide decision-making and improve productivity and employee engagement across the organization.

Previously, Sari led the Educator Community team, overseeing Curriculum Associates' content channels including the blog, podcast, and social media, while spearheading Extraordinary Educators advocate programs and launching the Extraordinary Educators podcast to amplify educator voices. Prior to that, she earlier founded and scaled the Marketing Operations team, managing a twelve-person team to streamline systems and trainings across a 200-person marketing organization, and previously led social communications and educator success initiatives for the company.

Before joining Curriculum Associates, Sari spent seven years at Uncommon Schools as a founding elementary teacher in Brooklyn, middle school math teacher in Boston, and instructional leader for the network. Her third graders achieved 100% proficiency in mathematics and 80% proficiency in ELA on the 2014 New York State Exam, ranking number one in the state, and her fifth and sixth graders at Roxbury Prep achieved a student growth percentile of 92% on the Massachusetts MCAS. She went on to serve as a School Support Specialist on Uncommon's Curriculum & Assessment Team, coaching teachers, developing network-wide curriculum and assessments, and facilitating professional development for teachers and leaders.

Sari earned her B.S. in Psychology and Educational Studies with honors from Trinity College and her M.S. in Education from Hunter College. She lives in Weston, Massachusetts, with her husband, two daughters, and golden retriever, and enjoys time with family, Peloton rides, and traveling.





**Kris Taylor**

**Bio:**

Dr. Kris Taylor is an experienced educator who works to achieve educational equity for all students and strong learning environments for all adults. Kris is the Director of Educational Leadership for the Center for Behavioral Health, Equity and Leadership in Schools at William James College (WJC) where she is also the director of the Graduate Certificate in School Leadership (GCSL) focused on Racial Understanding, Educational Equity and Organizational Transformation. GCSL is an aspiring principal program where students earn 18 graduate credits and state licensure to serve as a principal or assistant principal. Kris is a former manager at the Massachusetts Department of Elementary and Secondary Education (DESE), where she collaborated with school leadership teams and district teams to improve outcomes for all students while executing DESE policies outlined in the Massachusetts General laws. Prior to her work at DESE, Kris was a district leader for Boston Public Schools (BPS). As the Director of Leadership Development, she collaborated with an array of stakeholders, including superintendents, school leaders and partners to design and implement inquiry-based, ongoing professional learning experiences for Boston school principals. Her role also included creating and implementing a rigorous district hiring process to identify strong candidates to facilitate school-based hiring of school leaders. In addition, she created and implemented a series of sessions on diverse hiring practices. This initiative helped BPS to reach its diverse hiring goals for two consecutive years. Prior to district leadership, Kris was a school principal in Boston where she merged two school communities into a single K-8 school where academic achievement began to improve under her team's leadership.

More recently, Kris was the lead writer and project lead for a renewable 1.175 million dollar grant awarded to William James College (WJC) in 2023. This initiative focused on teacher diversification and addressing working conditions and school cultures that can serve as barriers to attracting and retaining talent.

Kris is also a graduate of DESE's Influence 100 program, which is designed to improve the percentage of superintendents who identify as people of color across Massachusetts.





## **Benjamin Feit**

Benjamin Feit brings 15 years of experience fusing his background in law, educational leadership and nonprofit management to help mission-driven organizations amplify their impact. As a senior executive at a Harlem nonprofit, Ben spearheaded a national expansion effort that catalyzed the creation of thousands of high-quality seats in Title I schools. While serving in central office and campus-based leadership roles, he strengthened the organization's capacity to be successful at scale by partnering with key internal and external stakeholders across the country to secure sustainable resources, fashion regionally responsive operational support systems, cultivate durable constituencies, and ensure effective governance.

Before joining Kittleman & Associates, Ben dedicated his career to promoting equity-driven innovation within public education systems. He has served as a trusted advisor to state and local education agencies, statewide charter support organizations, charter schools and networks, private foundations, university-based consultancies, and education innovation nonprofits. He has helped these organizations train board members and leaders, develop and execute multi-year strategic plans, implement and evaluate large-scale initiatives to address persistent opportunity and achievement gaps, and generate over \$500 million in competitive grants from public and private funding sources.

Ben is a part-time faculty member in the Educational Leadership & Policy Studies program at Boston University's Wheelock College of Education & Human Development. Before transitioning to a career in education, he clerked for the Honorable Anthony J. Scirica on the United States Court of Appeals for the Third Circuit. Ben has a BA from Yale, a JD from Duke University School of Law, and both an MEd and an EdD from Columbia University (Teachers College). He lives in the Boston area with his wife and two daughters.



# Coversheet

## Human Capital Update

<b>Section:</b>	II. Board Planning
<b>Item:</b>	C. Human Capital Update
<b>Purpose:</b>	Discuss
<b>Submitted by:</b>	
<b>Related Material:</b>	FY25-Exit-Summary-and-Retention-Analysis.pdf

# **FY25 EXIT SUMMARY & RETENTION ANALYSIS**

## **OCTOBER 2025**

A comprehensive review of staff retention trends, exit data, and strategic insights for organizational stabilization

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Fractional CPO, Lovette Curry



# EXECUTIVE SUMMARY: KEY TAKEAWAYS

❏ **Bottom Line:** FY25 marks a critical turning point with retention increasing 10 percentage points to 59%, signaling early stabilization after years of organizational transformation.

## RETENTION REBOUND

59% retention rate represents first meaningful improvement in four years, up from 49% in SY24


## STRATEGIC ATTRITION

89% of exits (39 of 44) were desired attrition, reflecting improved alignment with mission and expectations

## VETERAN STABILITY

Teacher tenure reached 3.1 years—highest in over 5 years—indicating strengthening organizational foundation

# FY25 RETENTION: A TURNING POINT

 **Key Insight:** The 10-point increase in retention demonstrates that leadership clarity, refined expectations, and cultural shifts are beginning to take root across the organization.

## 59% RETENTION RATE

This marks the first rebound in retention since SY21, representing a significant milestone in organizational stability.

- 10-point increase over previous year
- Aligns with healthy midpoint for charter schools in transition (55-65% range)
- Clear trajectory toward 65-70% target by SY26
- Reflects natural turnover from leadership restructuring and culture evolution

**Context:** While typical charter retention ranges 70-80%, schools undergoing transformation typically see 55-65%. Our position indicates healthy progress with room for continued growth.

59%

SY25 RETENTION


Up from 49%

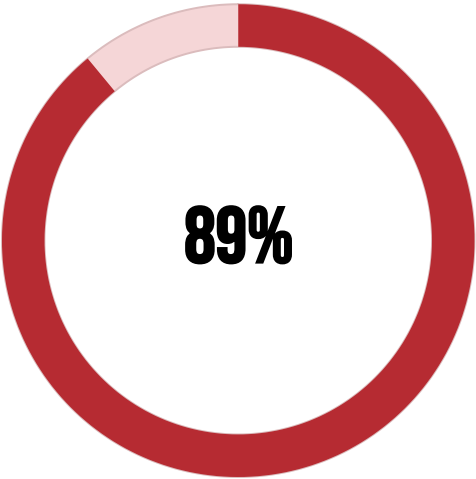
10PTS

YEAR-OVER-YEAR GAIN

First increase in 4 years

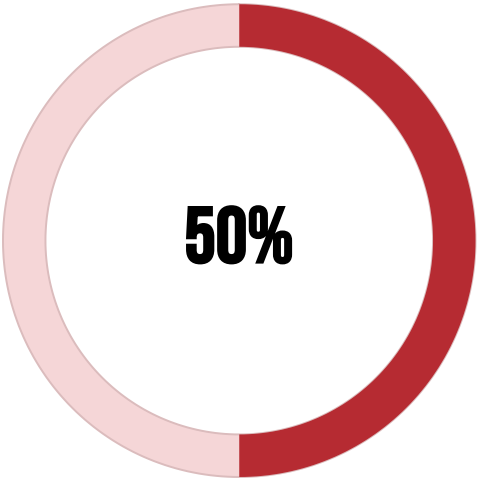
# ATTRITION PROFILE: QUALITY OVER QUANTITY

 **Strategic Implication:** High desired attrition rate (89%) indicates the organization is successfully selecting for mission-aligned staff, creating space for stronger future hires.



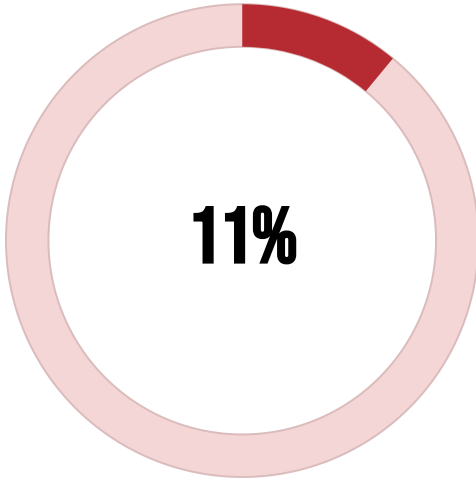
**DESIRED ATTRITION**

39 of 44 exits aligned with organizational goals



**VETERAN TEACHER EXITS**

4 teachers with 7+ years departed, half desired



**UNDESIRED ATTRITION**

Only 5 exits represented loss of aligned talent

The attrition pattern reflects natural turnover associated with leadership restructuring, refined expectations, and improved selectivity. Those who remain are increasingly aligned with the organization's mission and next chapter of growth.



# VETERAN TEACHER TENURE: RECORD HIGH

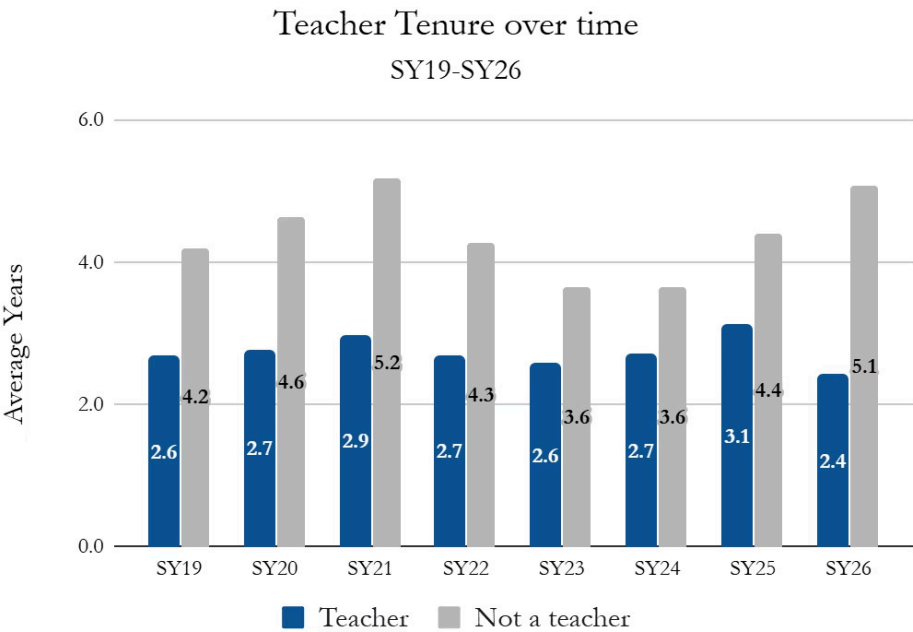
❏ **Critical Metric:** Teacher tenure reaching 3.1 years, **the highest in over 5 years**, demonstrates that experienced educators are choosing to stay, signaling organizational maturity.

## TENURE TREND ANALYSIS

The steady increase in veteran teacher tenure from previous years to 3.1 years in SY25 represents a fundamental shift in organizational stability and staff commitment.


## VETERAN EXIT CONTEXT

Of the 4 veteran teachers (7+ years) who departed, 50% were desired attrition due to misalignment with evolving expectations—a healthy indicator of cultural refinement.



✔ Analysis: The balanced mix of desired and undesired attrition among veteran staff suggests the organization is successfully maintaining high standards while retaining mission-aligned experienced educators.

# EXIT SURVEY RESPONSE ANALYSIS

 **Data Quality Note:** With 10 responses from 44 exits (23% response rate), findings provide directional insights but should be interpreted with appropriate caution regarding representativeness.

10

**SURVEY RESPONSES**

From 44 total exits

70%

**CULTURE-RELATED EXITS**

Cited culture and direction as primary reasons

23%

**RESPONSE RATE**

Moderate engagement in exit process

Approximately 70% of respondents stated that culture and organizational direction were their primary reasons for leaving, consistent with the natural attrition expected during periods of significant organizational transformation and leadership restructuring.

# WHAT STAFF VALUED: STRENGTHS TO PRESERVE

- 📌 **Organizational Assets:** Student relationships and mission-driven purpose remain core strengths that differentiate Boston Prep and should be protected during continued transformation.

## STUDENT-CENTERED CULTURE

"The kids are great, and I was appreciated by my supervisor. The observation and meeting schedule was great for my development as a teacher."

Staff consistently identified students as the best part of working at Boston Prep, highlighting strong student-teacher relationships.

## MISSION-DRIVEN PURPOSE

"The strong, mission-driven sense of purpose that permeates the entire staff."


The organization's commitment to its mission creates a compelling sense of shared purpose across the team.

## UNIQUE COLLEGE PERSISTENCE MODEL

"Boston Prep is in some ways unique. I have never before heard of a high school that provides alumnae in college with financing or provides additional academic help if they have trouble in college."

The comprehensive support model extending beyond graduation differentiates Boston Prep in the educational landscape.

# WHAT STAFF OBSERVED: OPPORTUNITIES FOR GROWTH

 **Strengthening Systems:** Staff feedback shows a need for clearer leadership structures, stronger systems, consistent instructional supports, and a more transparent culture to improve retention.

## LEADERSHIP STRUCTURE

Staff perceive leadership as redundant, top-heavy, and unclear, creating bottlenecks that slow decision-making and impact retention.

## SYSTEMS & STABILITY

Staff express frustration with frequent changes to policies, routines, and direction that create confusion, stress, and erode trust.


## ACADEMIC SYSTEMS

Staff wanted improved intervention systems and comprehensive professional development

## CULTURE & TRUST

Staff shared the need for an environment that encourages transparent communication, authentic dialogue opportunities, and consistent follow-through on commitments.

# STRATEGIC RECOMMENDATIONS FOR FY26

 **Action Plan:** Focus on four high-impact areas to achieve 65-70% retention target: leadership clarity, system stability, onboarding excellence, and trust rebuilding.

01

## STREAMLINE LEADERSHIP STRUCTURE

Reduce organizational layers, clarify accountability, and empower instructional leaders closest to students.  
Separate operational and instructional decision-making.

02

## ESTABLISH SYSTEM PREDICTABILITY

Implement multi-year planning cycles, stabilize core policies, and create consistent communication frameworks to reduce change fatigue.

03

## STRENGTHEN ONBOARDING & DEVELOPMENT

Redesign orientation to eliminate redundancy, increase planning time, and provide practical classroom application. Enhance first-year teacher support with clear "how-to" guidance.

04

## BUILD MTSS & ACADEMIC SYSTEMS

Develop comprehensive intervention framework, provide rigorous instruction PD, and establish consistent grading and feedback systems.

05

## REBUILD TRUST & CULTURE

Create authentic dialogue opportunities, ensure transparent communication, review discipline practices for equity, and demonstrate consistent follow-through.

# CONCLUSION: PATH TO SUSTAINED STABILITY

❏ **Strategic Outlook:** FY25 represents a critical inflection point. With focused execution on identified priorities, Boston Prep is positioned to achieve 65-70% retention by SY26 and build sustainable organizational health.

## TURNAROUND CONFIRMED

59% retention (up from 49%) signals early stabilization and validates strategic direction after years of transformation.

## STRATEGIC ATTRITION

89% desired attrition creates space for mission-aligned hires and reflects healthy cultural evolution, not organizational instability.

## ACTIONABLE FEEDBACK

Staff requests for system clarity, leadership streamlining, and stronger onboarding are within direct control and prioritized for FY26.

## SUSTAINMENT FOCUS

Next phase centers on retaining strong performers through leadership continuity, predictable structures, and embedded systems consistency.

# Coversheet

## Policy Updates

**Section:** III. Governance  
**Item:** A. Policy Updates  
**Purpose:** Discuss  
**Submitted by:**  
**Related Material:**  
Boston Prep Updated Competency Determination Policy - November 2025.pdf  
25-26 Title IX Policy.pdf



## **Updated Boston Prep Competency Determination Policy - Proposed November 21, 2025**

### **Overview**

In November 2024, Massachusetts voters approved Ballot Question #2, eliminating the statewide requirement for high school students to pass MCAS exams in ELA, Math, and Science/Technology/Engineering to graduate. DESE updated its Competency Determination (CD) policy, requiring schools to establish local CD policies aligned with state guidelines. This policy applies to the Class of 2026 and beyond.

At Boston Prep, our mission is to prepare students to succeed in four-year colleges and to embody, in thought and action, lifelong ethical growth. Central to this mission is ensuring that our students graduate equipped with the academic mastery, critical thinking skills, and character necessary to thrive in higher education and beyond.

In light of recent changes to the statewide graduation requirements, Boston Prep reaffirms our commitment to rigorous academic standards and has developed an updated local graduation requirements and competency determination policy to reflect this standard of excellence.

The purpose of this policy is to identify clearly the requirements students must fulfill to earn a competency determination.

### **Competency Determination Requirements**

Satisfactorily completing coursework shall mean a student earns full credit in accordance with Boston Prep's grading policy, which requires students to earn a minimum year-end average of 70. The final grade is based on performance on regular coursework, including daily work, homework, quizzes, tests, essays, and projects; as well as performance on an interim assessment at the conclusion of each of the first three quarters and an end-of-course assessment at the end of the fourth quarter.

#### English Language Arts

For English Language Arts, the student must: (i) satisfactorily complete coursework in the equivalent of two years of high school English Language Arts courses. The following Boston Prep courses count toward the competency determination in English Language Arts: English I, English II, English III, and English IV, AP Language and Composition, and AP Literature and Composition. A student will show mastery in English Language Arts by either (i) demonstrating proficiency in ELA through successful completion of all course requirements. This includes reading comprehension, analytical writing, vocabulary development, research skills, and performance on interim assessments; or (ii) earning a cumulative passing average on the three (3) interim assessments and the end-of-course assessment; or (iii) earning a passing score (3+) on the AP English Language or AP English Literature College Board exam.

#### Mathematics

For mathematics, the student must: (i) satisfactorily complete coursework in one year of both Algebra I and Geometry. The following Boston Prep courses count toward the competency determination in



**Mathematics:** Algebra I, Algebra IB, Geometry, Accelerated Geometry, Geometry B. A student will show mastery in Mathematics by either (i) demonstrating proficiency in grade-level mathematics concepts and practice, including problem solving, reasoning, procedural fluency, and application, by earning a passing year-end average of at least 70; or (ii) earning a cumulative passing average on the three (3) interim assessments and the end-of-course assessment

### Science

For science, the student must: (i) satisfactorily complete coursework in the equivalent of one year of Physics; or (ii) satisfactorily complete coursework in one year of Biology; or (iii) satisfactorily complete coursework in one year of Chemistry. The following Boston Prep courses count toward the competency determination in science: Pre-AP Biology, Physics, Pre-AP Chemistry, and AP Biology. A student will show mastery in science by demonstrating proficiency in scientific knowledge and practices, including conceptual understanding, data analysis, scientific inquiry, and application of core disciplinary ideas, by earning a passing year-end average of at least 70; or (ii) earning a cumulative passing average on the three (3) interim assessments and the end-of-course assessment; or (iii) earning a passing score (3+) on the AP Biology exam.

### U.S. History

Beginning with the graduating class of 2027, the student must satisfactorily complete coursework in one year of U.S. History. The following Boston Prep courses count toward the competency determination in U.S. History: U.S. History I, U.S. History II, and AP U.S. History. A student will show mastery in U.S. History by either (i) demonstrating proficiency in the key themes, concepts, and historical thinking skills outlined in the MA History and Social Science Framework for US History. Mastery is evidenced by earning a passing year-end average of at least 70 through sustained performance on coursework, including analysis of primary and secondary sources, argument writing, chronological reasoning, and consent based assessments; or (ii) earning a cumulative passing average on the three (3) interim assessments and the end-of-course assessment; or (iii) earning a passing score (3+) on the AP US History exam.

### **Additional Requirements**

In alignment with our district's mission, a student must also demonstrate successful completion of a Senior Ethics Defense, the culmination of their ethics course studies. The Senior Ethics Defense includes a written paper and an oral presentation in front of a teacher panel. Successful completion is assessed via a rubric that evaluates the student's ability to articulate and defend his/her personal code of ethics. In accordance with Boston Prep's grading policy, a student must earn an overall minimum grade of 70 on this capstone assignment.

### **Additional Considerations**

#### Students with disabilities

Boston Prep provides students with disabilities, including MA students receiving a publicly funded education in an out-of-district day or residential school, with an equal opportunity to meet the CD requirements through a variety of specialized supports, modifications, and, in some cases, alternative demonstration methods. Supports may include:

- IEP-aligned accommodations for instruction and assessment

- Specially designed instruction to access grade-level standards
- Alternate assessments (MCAS-Alt) where appropriate
- Adjusted pacing and reteaching
- Modified assignments or scaffolded performance tasks
- Collaboration between general education, special education, and related service providers
- Transition planning and post-secondary readiness supports

All decisions regarding assessment participation and the demonstration of competency are based on the student's IEP and determined by the IEP Team.

### English Learners

Boston Prep provides English learners equal opportunity to meet the CD requirements, including specialized supports. Boston Prep uses a Sheltered English Instruction (SEI) model for English Language Development (ELD) classes, co-taught history courses, and SEI core content classes.

Boston Prep high school students take their ELD classes during an Elective block, ensuring they have access to the full range of content courses that the high school offers. Each high school ELD class (9 ELD, 10 ELD, 11-12 ELD) is offered multiple times per day to ensure schedule flexibility for ML students.

Additionally, Boston Prep offers various academic support services and accommodations, including:

- After-school tutoring (Title III program)
- Student goal-setting and progress monitoring
- Assessment supports according to the student profile, including graphic organizers, extended time, and simplified instructions.
- Classroom supports according to the student profile, including word-to-word bilingual dictionaries, graphic organizers, and extended time.

### Late-Enrolling Students

Boston Prep supports late-enrolling students to meet the requirements of the competency determination through transcript reviews, summer school, and virtual learning through an online provider.

- Academic Planning: development of an individualized plan outlining remaining CD requirements and timelines
- Progress Monitoring and Check-In: Regular reviews with their advisor and the persistence team to ensure students remain on track toward
- Credit Recovery and Competency-Based Options: Opportunities to complete required content at an accelerated pace when appropriate.

### **Appeals Process**

Students and families may appeal CD decisions. The process includes:

- Notification in writing of CD denial and right to appeal.
- Within ten (10) business days of receipt of a *Competency Determination Appeal Form* submitted by a parent or guardian, the district will schedule a hearing.

- Hearing with the Chief Academic Officer and the Senior Director of Support Services (if applicable), at which time the parent/guardian and student have the opportunity to present evidence of mastery.
- Decision communicated in writing within ten (10) business days with a final CD determination, with next steps for graduation or additional support.

### **Diploma Request Process for Previously Enrolled Students**

Eligible students in previous classes who did not earn a diploma as a result of failing to meet the state's CD requirement may request a CD Review by completing a *CD Review Form*, available on the Boston Prep website. Upon receipt, the High School Principal, Chief Academic Officer, Director of Persistence, Senior Director of Special Education and Related Services (if applicable), and Director of Multilingual Education (if applicable) will convene to review the request, audit the transcript, and make a determination. The decision will be communicated in writing to the eligible student within ten (10) business days.

### **Certifications**

The Boston Prep Board of Trustees approved this policy on XX.

The policy has been shared with all students, families/guardians, and district stakeholders via email on XX.

The policy was made publicly available in multiple languages on XX, posted on the Boston Prep website at URL.

## Boston Prep Local Graduation Requirements

Boston Prep defines a credit as mastery of course objectives in a full-year course. Courses that meet less frequently than five days per week for the full year carry 0.5 or 0.25 credits, depending on meeting frequency and duration.

### Credit Requirements

A Boston Prep student must earn a total of 24 credits in grades 9-12 to meet local graduation requirements.

Subject Area	Class of 2028 and Beyond
Mathematics	4
English Language Arts	4
Science	4
History and Social Science	3
World Language	2
Health and Physical Education	1 (0.25 each year) Need to pass all 4 years
Arts	1

In addition to the credit requirements listed above, a Boston Prep student must also earn four (4) general elective credits and one (1) credit in Ethics.

### Additional Requirements

Above and beyond the credit requirements outlined in the previous section, a Boston Prep student must also complete three (3) summer enrichment opportunities. All Boston Prep high school students are required to participate in high-quality summer enrichment programs that promote their personal, academic, and professional growth. Students must be involved in a program that allows them to gain skills and knowledge, as well as grow personally and ethically.

In years past, examples of qualified summer enrichment programs included: participating in an academic camp or pre-college program, completing an internship program, volunteering a minimum of 40 hours of community service, enrolling in a leadership training institute or camp, or obtaining a summer position through the SuccessLink or ABCD youth employment program, and positions in

retail, sales, food industry, etc. did not count towards the summer enrichment requirement. Starting in the summer 2022, programs and job opportunities completed by students over the summer can earn the summer enrichment requirement credit, pending approval from the Director of Extracurricular & External Partners.

# APPENDIX A: SEXUAL HARASSMENT/TITLE IX POLICY

## **Introduction**

Title IX of the Education Amendments Act of 1972 and various state and federal laws protect all students and school employees from sex-based harassment that occurs during an educational activity, regardless of the sex of the parties. In school systems, sexual harassment may cross many lines, and may involve staff member and staff member, staff member and student, student and student, third party and staff member, or third party and student. All students and school employees can experience sex-based harassment, including male and female students/employees, LGBTQ+ students/employees, students/employees with disabilities, and students/employees of different races, national origins, and ages.

Any person who believes that a student, teacher, administrator, other school personnel or third party has engaged in conduct prohibited by this policy, whether such conduct has been directed at him/her/them or some other person, should report the alleged prohibited conduct as soon as possible to the appropriate Boston Prep (“Boston Prep”) official (as designated by this policy) verbally or in writing. Nothing in this policy shall prevent any person from reporting alleged prohibited conduct to a different Boston Prep employee than the one designated in this policy.

## **Policy Statement**

Boston Prep does not discriminate against individuals on the basis of sex, or any other category protected by state and federal law, in the administration of its educational and employment policies, and in its administered programs and activities, and provides equal access to all designated youth groups. Boston Prep is committed to maintaining an educational and work environment free from all forms of discrimination, including sexual harassment and retaliation.

## **Goals**

Boston Prep is committed to providing equal educational opportunities and a safe learning and workplace environment free from discrimination, including sexual harassment and retaliation. Boston Prep will not tolerate any form of discrimination, including sexual harassment and retaliation, within the school community. Boston Prep will promptly and fairly investigate and respond to all allegations and complaints of sexual harassment and retaliation. During the investigation process, Boston Prep will provide equitable treatment to complainants and respondents, ensure objective evaluation of all relevant evidence, and designate investigators and decision makers who are free from bias or conflict of interest. Following an investigation where it is determined that sexual harassment has occurred, Boston Prep will take prompt, appropriate disciplinary, corrective and remedial measures necessary to ensure a safe and equitable learning and workplace environment for all school community members.

## **Definitions**

Title IX identifies three separate types of conduct that would constitute “sexual harassment”:

- An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual’s participation in unwelcome sexual conduct (“quid pro quo harassment”);

- Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient's education program or activity ("hostile environment harassment"); or
- "Sexual assault" as defined in 20 U.S.C. 1092(f)(6)(A)(v), "dating violence" as defined in 34 U.S.C. 12291(a)(10), "domestic violence" as defined in 34 U.S.C. 12291(a)(8), or "stalking" as defined in 34 U.S.C. 12291(a)(30).
- Examples of unwelcome conduct that may establish a hostile environment include but are not limited to unwelcome sexual advances; requests for sexual favors; verbal, nonverbal or physical conduct of a sexual nature; sex discrimination; threats of violence; and/or physical assault.

The following additional definitions apply:

"Actual knowledge" means notice of sexual harassment or allegations of sexual harassment to any employee of Boston Prep, except that this standard is not met when the only official of Boston Prep with actual knowledge is the respondent (where the respondent is an employee). Imputation of knowledge based solely on vicarious liability or constructive notice is insufficient to constitute actual knowledge. Complaints will be addressed whenever Boston Prep has actual knowledge of the allegation.

"Administrative leave" means placing an employee on leave pursuant to state law. Nothing in the Title IX regulations precludes a recipient from placing a non-student employee respondent on administrative leave during the pendency of a grievance process, provided that Massachusetts laws are followed.

"Consent" means cooperation in act or attitude pursuant to an exercise of free will of a conscious person with informed knowledge of the nature of the act or actions. A current or previous relationship shall not be sufficient to constitute consent. Consent will not be found when submission to the act or actions is undertaken due the influence of fear, fraud, forcible compulsion, threats, and/ or the complainant possessed any legal incapacity to consent at the time of the act or actions. Consent is a defense to all types of sexual harassment.

"Complainant" means an individual who is alleged to be the victim of conduct that could constitute sexual harassment.

"Deliberate indifference" means a response to sexual harassment that is clearly unreasonable in light of the known circumstances.

"Emergency removal" means the suspension or expulsion of a student on an emergency basis, consistent with state law. Nothing in the Title IX regulations precludes Boston Prep from removing a respondent from Boston Prep's education program or activity on an emergency basis, provided that Boston Prep follows all procedures under Massachusetts law, undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal.

Formal complaint means a document filed by a complainant (or the complainant's parent or guardian if the complainant is a student) or signed by the Title IX Coordinator alleging sexual harassment and requesting that Boston Prep investigate the allegation of sexual harassment.

"Respondent" means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

"Supportive measures" means non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the recipient's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the recipient's educational environment, or deter sexual harassment. Supportive measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures. Boston Prep must maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of the recipient to provide the supportive measures. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures.

### **Application of Title IX/Sexual Harassment Policy**

To be covered by Title IX, the sexual harassment must have occurred in the school's education program or activity and the complainant must have been participating in or attempting to participate in an education program or activity at the school at the time the complaint is filed. The complainant must also have been in the United States when the conduct occurred.

Boston Prep will investigate all allegations of sexual harassment of which it has actual knowledge and which are alleged to occur in the school's programs and activities, including locations, events, and/ or circumstances in which the Boston Prep exercises substantial control, in accordance with this policy and in a way that is not deliberately indifferent.

While Title IX covers the above-described definition of "sexual harassment", Boston Prep recognizes that the Title IX standard does not capture all conduct that amounts to sexual harassment under school policy and other state and federal laws. Therefore, while Boston Prep prohibits "sexual harassment" as defined by Title IX, it also prohibits sexually harassing conduct that may fall outside of Title IX's definition and includes other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating an environment that is hostile, offensive, intimidating, or humiliating to students or employees.

If Boston Prep determines that the alleged conduct falls outside of Title IX's scope but still constitutes sexual harassment under other school policies, Boston Prep will implement appropriate remedial and/or disciplinary action in accordance with those policies.

Please note that incidents of sexual harassment may constitute child abuse under state law and may also violate criminal laws. Boston Prep will also comply with all legal requirements governing the



reporting of suspected cases of child abuse and criminal violations to the appropriate authorities, including the Department of Children and Families.

**Complaint and Reporting Process:**

For allegations of sex-based discrimination, including sexual harassment, sexual violence, and gender-based harassment by a Boston Prep employee or volunteer, another student at Boston Prep or a third party, immediately report the incident to Boston Prep's Title IX Coordinator and /or the Principal of your school building. The Title IX Coordinator's contact information is as follows: Courtney McColgan ([cmccolgan@bostonprep.org](mailto:cmccolgan@bostonprep.org))

Nothing in this policy shall prevent any person from reporting alleged prohibited conduct to a different Boston Prep employee than the one designated in this policy.

Upon receiving actual notice of alleged sexual harassment, all non-student members of the Boston Prep community (including Boston Prep board members, administration, faculty, staff, volunteers in schools and/or parties contracted to perform work for Boston Prep, subject to school authority) must notify the Title IX coordinator as soon as practicable, but no later than 24 hours after becoming aware of the incident. Failure to comply with this mandatory reporting requirement or this Protocol may lead to disciplinary action.

The Title IX coordinator, and/or designated school administrator and/or employee, must then contact the complainant within two days of receiving the complaint and do the following:

- Promptly offer and discuss supportive measures with the complainant.
- Consider the complainant's wishes with respect to supportive measures;
- Explain that supportive measures may be received with or without filing a formal complaint;
- Explain the process of filing a formal complaint and determine whether the complainant wishes to file a formal complaint; and
- Explain to the complainant the purpose of filing a formal complaint.

The Title IX Coordinator must document in writing the supportive measures offered/provided or why no supportive measures were offered/provided. Complainant and respondents must be offered supportive measures even if they do not file a formal complaint.

If the complainant declines to file a formal complaint, the Title IX Coordinator must consider whether to sign a formal complaint and start an investigation despite the complainant's preferences. This decision may be appropriate when safety or similar concerns lead Boston Prep to conclude that a non-deliberately indifferent response to actual knowledge of Title IX sexual harassment could reasonably require Boston Prep to investigate and potentially sanction a respondent. A Title IX Coordinator's decision to override the complainant's decision not to file a formal complaint must be documented in writing along with an explanation of why this decision was necessary in order to avoid deliberate indifference. If a formal complaint is not made, Boston Prep may still investigate the report of sexual harassment in accordance with its Non-Discrimination Policy, taking the complainant's wishes into consideration.

Formal complaints may also be filed directly with the Title IX Coordinator by a complainant in person, by mail, by email, or by telephone at any time, including during non-business hours.

The complaint may be written by the complainant, or it will be reduced to writing by either the school employee who receives the complaint, the building Principal, or the Title IX Coordinator. Whether the complaint is reduced to writing by a student, parent, or staff member, the written complaint should include the name of the complainant, the name of the alleged victim (if different), the name of the respondent, the location of the school/department where the alleged discriminatory action occurred, the basis for the complaint, witnesses (if any), and the corrective action the complainant is seeking. This information will be made on or transferred to a discrimination/harassment complaint form maintained by Boston Prep.

There is no time limit or statute of limitation on timing to file a formal complaint. However, at the time of filing a formal complaint, an alleged victim must be participating or attempting to participate in a program or activity of Boston Prep. Additionally, Boston Prep has discretion to dismiss a formal complaint where the passage of time would result in Boston Prep's inability to gather evidence sufficient to reach a determination regarding responsibility, or when Boston Prep loses responsibility for the respondent (e.g., the respondent no longer attends or is employed by Boston Prep).

If the conduct alleged in the formal complaint would not constitute sexual harassment as defined in this policy even if proved, did not occur in Boston Prep's education program or activity, or did not occur against a person in the United States, then Boston Prep must dismiss the formal complaint under these procedures, but could investigate it under other policies and procedures. Boston Prep will send written notice of any dismissal.

### **Written Notice of Formal Complaint**

Upon receiving a formal complaint of sexual harassment, Boston Prep will provide the complainant and the respondent written notice of the allegations, the grievance process, the appeal process, available supportive measures, and possible disciplinary sanctions and remedies. The written notice will also include a statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process. The written notice must inform the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney, and may inspect and review evidence. The written notice must inform the parties that the Boston Prep's code of conduct prohibits knowingly making false statements or knowingly submitting false information during the grievance process.

If additional allegations are added during the course of the investigation, additional written notice must be provided.

### **Informal Resolution**

Where appropriate, and only after a formal complaint has been filed and written notice has been issued, the Title IX Coordinator should also consider offering the parties an option for informal resolution (e.g., mediation). Participation in an informal resolution process may only occur where both parties give voluntary, informed, written consent to attempt informal resolution, and either party has the right to withdraw from the informal process at any time. The informal complaint option is not available for reports of employee-on-student sexual harassment; in this context a formal investigation is required. Where an informal resolution process is agreed to, it will be facilitated by a facilitator designated by the Title IX coordinator who does not have a conflict of interest and/or bias for or against complainants or respondents and who has received proper training.

Informal resolution is entirely voluntary. Parties may elect to pursue formal procedures and decline informal resolution at any step in the process, even if informal resolution has already begun.

If the parties are not satisfied with the resolution from the informal process, or if he/she/they do not choose informal resolution, then he/she/they can begin the formal complaint procedure described below.

### **Investigation**

If informal resolution is not offered to or accepted by the parties, the Title IX Coordinator will designate an investigator and a decision maker, who may not be the same person.

All formal complaints will require a full investigation in accordance with the Title IX grievance process. For formal complaints of sexual harassment, the investigator will conduct and complete a thorough and impartial investigation into the reported conduct within a reasonably prompt timeframe, with delays for good cause only. Good faith efforts will be made to complete the investigation within 15 school days of the initiation of the formal complaint, except for good cause, as documented in the investigation file. Where feasible, the formal process will be completed within a ninety (90) day timeframe from the date a formal complaint is filed with Boston Prep. There may be a temporary delay of the grievance process or the limited extension of time frames for good cause with written notice to the complainant and the respondent of the delay or extension and the reasons for the action. Good cause may include, but is not limited to, considerations such as the absence of a party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities.

### **Gathering Evidence**

The investigation will include personal interviews with the complainant(s), the individual(s) against whom the complaint is filed, and others who have knowledge of the alleged incident(s) or circumstance(s) giving rise to the complaint. The investigation may also consist of other methods deemed pertinent by the investigator, including but not limited to gathering physical evidence. The investigator will find facts and making determinations related to credibility, all of which will be incorporated into a written report. The investigator must avoid all questions that are protected by legal privilege, unless the privilege has been waived, and should avoid asking about the complainant's sexual history unless it is directly relevant to prove consent to the conduct at issue or to prove that the conduct was committed by someone other than the respondent.

Boston Prep will keep confidential the identity of complainants, respondents, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out a Title IX proceeding.

For Title IX purposes, if a student requests that his/her/their name not be revealed to the alleged perpetrator, honoring the request may limit Boston Prep's ability to respond fully to the incident, including pursuing disciplinary action against the alleged perpetrator. Title IX includes protections against retaliation, including retaliatory actions taken by the school and school officials, and school officials will not only take steps to prevent retaliation but will also take strong responsive action if it occurs. Confidentiality concerns should be brought to the attention of the Title IX Coordinator, whose contact information is provided above, and/or the Principal of your school building.

Boston Prep has the burden of gathering the evidence, not the parties. However, parties may gather and present evidence of their own. All parties will be provided with an equal opportunity to review and respond to evidence gathered during the investigation.

All parties whose participation is invited or expected will be provided with written notice of the date, time, location, participants, and purpose of all investigative interviews, or other meetings with a party, with sufficient time for the party to prepare to participate.

All parties will be provided with the opportunity to be accompanied to any related meeting, interview or proceeding by an advisor of their choice, who may be, but is not required to be, an attorney.

Boston Prep will not require, allow or rely upon privileged information, unless privilege is waived in writing by the holder.

All parties will be provided with an equal opportunity to review and respond to evidence gathered during the investigation. Prior to completion of the investigative report, Boston Prep will send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy, and the parties will have ten (10) days to submit a written response to the evidence, which the investigator will consider prior to completion of the investigative report.

### **Investigative Report & Written Questions**

Upon its completion, the parties will be provided with a copy of the investigative report for their review and, if desired, written response. Written responses from the parties will be required within ten (10) days of receipt of the investigative report and will be incorporated into the investigative report.

After the parties' responses to the investigative report, if any, have been incorporated into the investigative report, but prior to reaching a determination regarding responsibilities, the decision-maker(s) – who will not be the same person(s) as the investigator and/or Title IX coordinator – will afford each party the opportunity to submit written questions for the other parties and witnesses to answer, provide each party with the answers, and allow for additional, limited follow-up questions from each party. If any questions are determined not to be relevant, the decision-maker may exclude the questions and will explain to the party proposing the questions any decision to exclude questions as not relevant. Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent.

### **Written Determination & Standard of Evidence**

After this process, the decision-maker will issue a written determination simultaneously to the parties regarding whether sexual harassment has occurred using a preponderance of the evidence standard, as it does for all conduct code violations that do not involve sexual harassment but carry the same

maximum disciplinary sanctions. Resolution proceedings are conducted to take into account the totality of all evidence available, from all relevant sources.

A “preponderance of the evidence” means that it is more likely than not that the alleged conduct occurred. The decision-maker shall further recommend what action, if any, is required. If it is determined that sexual harassment occurred, Boston Prep will take steps to prevent the recurrence of the harassment and correct its discriminatory effect on the complainant and others if appropriate. Such remedies may include supportive measures.

The written determination must be issued to both parties simultaneously and must include:

- Identification of the allegations potentially constituting sexual harassment;
- A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, etc.;
- Findings of fact supporting the determination;
- Conclusions regarding the application of the recipient’s code of conduct to the facts;
- A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions the recipient imposes on the respondent, and whether remedies designed to restore or preserve equal access to the recipient’s education program or activity will be provided by the recipient to the complainant; and
- Boston Prep’s procedures and permissible bases for the complainant and respondent to appeal (a copy of, or direct reference to, this policy will suffice).

### **Disciplinary Action, Corrective Action, and Remedial Measures**

If the respondent is ultimately found responsible, the complainant will be made aware of any sanctions imposed on the respondent that directly relate to the complainant. The respondent will not be notified of individual remedies offered or provided to the complainant. If the respondent is ultimately found responsible, Boston Prep will effectively implement remedies for the respondent, complainant and where appropriate, for the broader student population. The remedies will be designed to restore or preserve equal access to the educational program or activity for a complainant, end the harassment, eliminate the hostile environment, prevent its recurrence, and remedy its effects. Remedies may include, but are not limited to, disciplinary sanctions against the respondent, up to and including termination and/or expulsion, counseling for the respondent, an escort for the complainant, ensuring that complainant and respondent do not share classes or extracurricular activities, providing comprehensive victim services, training or retraining school employees, changes to Boston Prep’s policies and/or services, etc. Any disciplinary action will be in accordance with due process rights under State law and any applicable collective bargaining agreement.

As indicated above, these procedures do not limit Boston Prep from removing a student or employee from a program or activity on an emergency basis based on immediate threats to people’s physical health or safety or placing an employee on administrative leave during the pendency of the investigation.

### **Appeal Process**

Parties may appeal the decision issued as a result of the investigation, or from Boston Prep’s dismissal for a formal complaint or any allegations therein, within 15 school days of receipt of the

findings of the formal procedure or a dismissal. The decision-maker(s) for the appeal will not be the same person as the decision-maker(s) who reached the determination regarding responsibility or dismissal, the investigator(s), and/or the Title IX Coordinator. Parties may appeal on the basis of procedural deficiencies; bias or conflict of interest; newly discovered evidence; and/or other good cause.

Boston Prep will notify the other party in writing when an appeal is filed and implement appeal procedures equally for both parties. Both parties will have a reasonable, equal opportunity to submit a written statement in support of, or challenging, the outcome.

The appeal decision-maker will review the comprehensiveness and accuracy of the investigation and the conclusions, and issue written findings to both the complainant and respondent within thirty (30) school days of the appeal.

### **Training**

Boston Prep will ensure that Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process, receive training on the definition of sexual harassment, the scope of the recipient's education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias.

Boston Prep will ensure that decision-makers receive training on any technology to be used in interviews and on issues of relevance of questions and evidence, including when questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant,.

Boston Prep also must ensure that investigators receive training on issues of relevance to create an investigative report that fairly summarizes relevant evidence.

Any materials used to train Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process, must not rely on sex stereotypes and must promote impartial investigations and adjudications of formal complaints of sexual harassment.

These training materials will be posted on Boston Prep's website.

### **Records**

A record will be maintained for a period of seven years of any actions, including supportive measures, taken in response to a report or formal complaint of sexual harassment and Boston Prep staff will document the basis for Boston Prep's conclusion that its response was not deliberately indifferent.

### **Referral to Law Enforcement, Other Agencies**

Some alleged conduct may constitute both a violation of Boston Prep policies and criminal activity. The building Principal, coordinator, Superintendent, or his/her designee will refer matters to law enforcement and other agencies as appropriate under the law or Boston Prep policy, and inform the complainant/ alleged victim of the right to file a criminal complaint.

### **Retaliation**



Retaliation against an individual who has brought good faith allegations of sexual harassment to the attention of Boston Prep or who has cooperated in an investigation of a complaint under this policy is unlawful and will not be tolerated by Boston Prep. If a student/employee believes that he/she/they has/have been retaliated against in connection with any good-faith report of inappropriate conduct or harassment, the student/employee should immediately report such conduct to the Title IX Coordinator and/or Principal of your school building. The Title IX Coordinator and/or designee will investigate reports of retaliation and, where retaliation is found, take separate remedial and disciplinary action.

In addition to the above, if you believe you have been subjected to unlawful harassment and/or retaliation you maybe file a complaint with either or both of the following local government agencies. Each of the agencies has a short time period for filing a claim.

United States Equal Employment Opportunity Commission,  
JFK Federal Building,  
475 Government Center  
Boston, Massachusetts, 02203  
800-669-4000

Massachusetts Commission Against Discrimination,  
Boston office at One Ashburton Place  
Sixth Floor, Room 601  
Boston, MA 02108,  
617-994-6000

Office of Civil Rights (U.S. Department of Education)  
5 Post Office Square, 8<sup>th</sup> Floor  
Boston, MA 02129  
(617) 289-0111

You may also file a complaint directly with the Office of Program Quality Assurance at the Department of Elementary and Secondary Education or seek outside counsel.

