CITIZENS' PETITION TO THE SOUTHWICK-TOLLAND-GRANVILLE REGIONAL SCHOOL COMMITTEE

Request for Review and Amendment of Policy BEDH and Alignment of Public-Comment Rules Published on School Committee Agendas

To the Members of the Southwick-Tolland-Granville Regional School Committee

We, the undersigned residents and members of the Southwick-Tolland-Granville Regional School District community, respectfully petition the School Committee to review and amend Policy BEDH and its public-comment practices so that parents and community members have a meaningful and clearly defined opportunity to address matters concerning the operation, governance, and administration of the school district.

Primary Concern: The Permitted Subject Matter of Public Comment *IS* Narrowly Defined
STGRSD Policy BEDH, revised November 4, 2024, limits remarks to matters within the School Committee's scope of authority and describes that authority primarily as selecting and terminating the Superintendent, reviewing and approving the education budget, and establishing educational goals and policies. This formulation can leave residents uncertain whether they may address administrative decisions and practices, implementation of district policies and programs, school climate and safety, educational services and student supports, systemic concerns affecting students and families, and other operational matters of legitimate public concern.

More current Massachusetts policy guidance demonstrates that the Committee can describe its authority more clearly. The MASC Updated 2023 model BEDH expressly includes "the performance of the Superintendent" and provides that comments concerning other personnel or students are generally prohibited unless those comments concern matters within the School Committee's authority. A September 2024 MASC public-comment presentation goes further in a sample draft by expressly including "the general operations of the district" and stating that no speaker should be prevented from speaking based on the content or viewpoint of comments that comply with lawful meeting rules.

This narrow formulation also warrants review in light of STGRSD's own foundational and governance policies. Policy AB states that the School Committee has an obligation to determine and assess citizens' desires, recognizes parents and communities as having an integral role in educational excellence, and establishes Public Communication & Participation as a School Committee goal. That goal calls for the Committee to actively communicate with all segments of its communities and encourage participation in the educational process. These commitments, together with the Committee's broader governance responsibilities, support a public-comment policy that clearly identifies meaningful avenues for community participation on matters within the Committee's authority.

Massachusetts Districts Provide Practical Examples
Hamilton-Wenham Regional School District expressly identifies "objective criticisms of school operations and programs" as a subject within the Committee's scope, in addition to the budget, Superintendent performance, and educational goals and policies. Its policy also preserves the exception for personnel/student comments that concern matters within School Committee authority. Norwood Public Schools provides up to 30 minutes for public comment, requires speakers to state their name and city/town, expressly includes Superintendent performance, preserves the MASC personnel/student exception, and currently provides both in-person and remote public-comment participation. These examples demonstrate that the reforms requested here are not unprecedented. Individual elements already appear in MASC policy guidance and in Massachusetts school-district practice.

Additional Concern: Meeting Agendas Communicate Restrictions *NOT* Stated in BEDH
Recent STGRSD meeting materials have included the heading "PUBLIC COMMENT - excluding personnel issues" and language stating that the Committee will not hear personal complaints of school personnel or against members of the school community and that administrative channels are generally the proper means for staff complaints. Those additional restrictions appearing on School Committee meeting agendas DO NOT appear in the BEDH November 4, 2024 Policy:

"PUBLIC COMMENT – excluding personnel issues Anyone wishing to make a public comment must appear in-person at the meeting. In-person speakers will be allowed three (3) minutes to present their material and must begin by stating their name and address. The total time limit for public comment is fifteen (15) minutes. The presiding chairperson may permit extension of this time limit, in extenuating circumstances. Improper conduct and remarks will not be allowed. Comments may offer such objective criticisms of the school operations and programs as concern them, but in public session, the committee will not hear personal complaints of school personnel nor against any member of the school community. Under most circumstances, administrative channels are the proper means for disposition of legitimate complaints involving staff members."

The Committee should reconcile these materials and clearly distinguish private individual personnel matters from legitimate public discussion of School Committee decisions, Superintendent performance and oversight, administrative actions and practices, district operations, implementation of policies and programs, and other matters within the Committee's authority.

Administrative Channels must *NOT* become a Dead End

The District's meeting language states that "under most circumstances" administrative channels are the proper means for disposition of legitimate complaints involving staff members. However, STGRSD's own School Committee governance policies recognize that administrative channels are not necessarily the end of the process.

Policy BCA, School Committee Member Ethics, directs School Committee members to refer complaints to administrative staff for solution and to "only discuss them at committee meetings if such solutions fail." Policy BBA, School Committee Powers and Duties, further states that the Committee "takes a broad view of its functions," including evaluating the effectiveness of its policies and their implementation and keeping itself and school staff informed about the needs and wishes of the public. Policy BA, School Committee Operational Goals, calls for the Committee to carry out its functions openly while seeking comments from the public, students, and staff in its decision-making processes.

These policies establish an important distinction: administrative channels are appropriately the first avenue for many complaints, but STGRSD's own governance framework contemplates School Committee involvement when administrative solutions fail and the matter warrants Committee consideration. BEDH and the public-comment instructions should clearly explain that distinction and provide residents with a meaningful escalation path for unresolved matters involving School Committee policy, Superintendent performance or oversight, district administration, systemic practices, student services or safety, or another matter within the Committee's lawful authority.

Relevant Neighboring-District Practice:
Westfield, MA
A nearby Massachusetts district provides a useful comparison. Westfield Public Schools' Policy BEDH, "Public Comment at School Committee Meetings," provides that speakers may speak for up to three minutes and must begin by stating their "name and city/town." Westfield does not require speakers under that policy to publicly announce a full street address. Westfield's policy also allows a public-

comment segment of up to 30 minutes, compared with STGRSD's 15-minute total limit. This comparison demonstrates that a neighboring Massachusetts school district can identify speakers and administer orderly public comment without requiring public disclosure of a full residential address.

West Springfield, MA
West Springfield Public Schools provides an additional nearby comparison in how public comment is presented to residents. Multiple recent West Springfield School Committee agendas reviewed on their website for this petition identify the general participation period simply as “PUBLIC COMMENTS,” without displaying additional subject-matter exclusions or complaint restrictions within the agenda item. A publicly posted West Springfield BEDH or equivalent public-comment policy was not identified in our review on their website.

We Respectfully Request that the School Committee

1. Amend BEDH to broaden and clearly define the permissible subject matter of public comment, consistent with the Committee’s own broader responsibilities under Policies BA and BBA, including district operations, administrative decisions and practices, implementation and effectiveness of policies and programs, school climate and safety, educational services and student supports, systemic concerns affecting students and families, and other matters of legitimate public concern that fall within School Committee authority.
2. Expressly identify Superintendent performance and oversight as permissible subject matter, consistent with the MASC Updated 2023 model and Massachusetts district practice.
3. Replace any blanket "excluding personnel issues" formulation with a clear distinction between private individual personnel/student matters and comments that concern matters within School Committee authority, consistent with the exception contained in the MASC Updated 2023 model.
4. Establish a clear escalation process for unresolved complaints consistent with STGRSD’s own governance policies. Policy BCA expressly contemplates School Committee discussion when complaints have been referred to administrative staff and administrative solutions fail. BEDH should therefore identify how a parent or resident who has made a good-faith effort to pursue appropriate administrative channels may bring an unresolved matter within the School Committee’s authority to the Committee for appropriate consideration, including how such a matter may be requested for placement on a future School Committee agenda. Confidential student and personnel information would remain protected.
5. Reconcile Policy BEDH, meeting agendas, and other district materials so the public receives one clear and current statement of the rules governing public comment.
6. Ensure that respectful criticism of permissible subjects is not prohibited merely because it is critical and that meeting rules are administered consistently and without discrimination based on viewpoint.
7. Replace the requirement that speakers publicly state their full residential address with a name-and-city/town identification standard. STGRSD’s public-comment instructions currently require speakers to state their “name and address,” and district meeting records demonstrate that a public commenter’s full street address has been recorded alongside the individual’s name and published in School Committee meeting materials. Requiring and subsequently publishing a resident’s street address creates an unnecessary privacy concern when residency can be established through a less intrusive means. The MASC Updated 2023 model BEDH uses name and city/town, and STGRSD should adopt the same standard..
8. Reconsider the 15-minute total limit and consider a 30-minute framework, with discretion to extend the period when public interest warrants.
9. Provide reasonable remote or alternative public-comment participation, using existing Massachusetts district practices as workable example.

Purpose of this Petition
This petition does not ask the School Committee to permit disruption, threats, unlawful harassment, defamation, disclosure of information confidential by law, or unrestricted public discussion of private student or personnel matters. Nor does it ask the Committee to adjudicate individual personnel disputes during public comment. It asks the Committee to modernize BEDH so residents can meaningfully address district operations, administrative accountability, Superintendent performance and oversight, systemic student concerns, educational policy and services, and other legitimate matters of public concern within the Committee's authority, and so residents who have properly pursued administrative channels are not left without a clearly defined avenue for appropriate School Committee review.

By signing below, we respectfully request that this matter be placed before the School Committee for public discussion and consideration.

Sources and Legal References:
Policy and guidance references: STGRSD Policy BA, School Committee Operational Goals; STGRSD Policy BBA, School Committee Powers and Duties; STGRSD Policy BCA, School Committee Member Ethics; STGRSD Policy BEDH (revised Nov. 4, 2024); STGRSD Policy AB, The People and Their District; STGRSD public-comment meeting materials; MASC Model Policy BEDH (Updated 2023); MASC Member Handbook, “Citizen Complaints"; MASC public-comment guidance; Hamilton-Wenham Regional School District Policy BEDH; Norwood Public Schools Policy BEDH/public-comment procedures; Massachusetts Open Meeting Law, G.L. c. 30A, §§18-25; Barron v. Kolenda, 491 Mass. 408 (2023).