

Somerville Special Education Parent Advisory Council (SEPAC)

August 13, 2025

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CC: Erica Gonzales, Associate Commissioner of Data and Accountability;
Robbie Havdala, Director of District and School Accountability;
Somerville School Committee
Somerville Superintendent Dr. Carmona

Subject: Concerns and Feedback Regarding the Upcoming District Review of Somerville Public Schools

Dear Mr. Curtin,

The Somerville Special Education Parent Advisory Council (SEPAC) is submitting this letter and report to actively fulfill our participatory and advisory role within the Somerville Public Schools. We have, unfortunately, encountered significant challenges in having our voices heard and being adequately included in discussions with the school district to date. This submission is specifically in response to the Department of Elementary and Secondary Education's (DESE) February 28, 2025, notification to Superintendent Rubén Carmona regarding the upcoming district review by the Office of District Reviews and Monitoring (ODRM) of Somerville Public Schools (SPS) for the 2025-2026 school year.

We welcome this district review as a vital and long-overdue opportunity for external oversight. As the body charged with advising the district on behalf of families of students with disabilities, we have serious and persistent concerns about the district's ability to meet its legal and ethical obligations to our children on a systemic level. The recent determination from DESE that Somerville Public Schools "Needs Assistance" for the 2024-2025 school year under IDEA Part B validates the systemic issues we have consistently raised.

In anticipation of this formal review process, and to provide your office and its external partner organization with critical context, the Somerville SEPAC has prepared the following report. This document details the profound gap between the district's articulated vision for equity and the lived reality of its most vulnerable students.

Structured using DESE's own District Standards and Indicators, our analysis synthesizes district data, public records, and extensive, courageous testimony from educators and parents. It

documents a district failing to meet the needs of its students and staff, characterized by systemic non-compliance with the Individuals with Disabilities Education Act (IDEA), inequitable academic and long-term outcomes, and an operational failure to provide students with disabilities the services, supports, and opportunities they are legally and morally owed.

We submit this report as our formal feedback and urge that it be used as a foundational document to guide the review team's investigation. It is our hope that this process will bring much-needed accountability and lead to the systemic, structural changes necessary to ensure Somerville Public Schools provides a free, appropriate public education (FAPE) to every student.

Thank you for your attention to these critical issues. We look forward to engaging with the review team.

Sincerely,
The Somerville Special Education Parent Advisory Council (SEPAC)

Evidence-Based Review of SPS

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Introduction

Purpose and Scope

This report presents an analysis of Somerville Public Schools (SPS), structured through the lens of the six District Standards and Indicators established by the Massachusetts Department of Elementary and Secondary Education (DESE). ¹ Its purpose is to provide a comprehensive evaluation of district performance, with a primary focus on the systemic issues affecting students with disabilities. The analysis synthesizes a wide array of evidence, including quantitative performance data, ² district and school-level strategic plans and school improvement plans^{3 4 5 6 7 8 9 10 11 12 13}, and extensive public testimony from educators, parents, and community members. ^{14 15 16} By examining the district's policies and practices, this report seeks to illuminate the profound challenges facing its most vulnerable students and to assess the district's fulfillment of its legal and ethical obligation to provide a Free Appropriate Public Education (FAPE) to every student with a disability.

Methodology

The findings and conclusions included in this report are derived from a detailed synthesis of official district documentation and public records. This includes a quantitative analysis of the 2024 MCAS results and state accountability data, ² a qualitative review of the district's guiding documents, including the Strategic Plan, ³ the Student Opportunity Act (SOA) Plan⁴, and all individual School Improvement Plans (SIPs); ^{5 6 7 8 9 10 11 12 13} and a thorough examination of stakeholder testimony provided in public forums. ^{14 15 16} This comprehensive methodology allows for the corroboration of findings by examining official district documentation and public records alongside quantitative data and stakeholder testimony, contrasting the district's stated intentions with its actual practices and student outcomes.

Thesis Statement

While Somerville Public Schools has articulated a clear and compelling vision for equity and excellence, a significant and deeply concerning gap exists between this vision and the lived reality of students with disabilities. This gap is not a matter of minor shortcomings but is characterized by profound disparities in academic and long-term outcomes, systemic under-resourcing of essential programs, and widespread evidence of non-compliance with foundational tenets of state and federal special education law. The district is operating a dual system: an aspirational one detailed in its planning documents and an operational one that systematically fails to provide students with disabilities the services, supports, and opportunities they are legally and morally owed.

I. Leadership and Governance

The DESE standard for Leadership and Governance assesses whether leadership structures, strategic planning, and district culture work in concert to "promote high-quality teaching and learning that is antiracist, inclusive, multilingual, and multicultural" and "creates equitable opportunities and experiences for all students, particularly those who have been historically underserved." ¹ An analysis of Somerville Public Schools reveals a fundamental disconnect between the district's strategic planning and its implementation and monitoring. The leadership's inability to align fiscal and human resources with its stated goals has resulted in a systemic failure to support students with disabilities, undermining the very vision it claims to advance. This failure has been formally recognized by DESE, which has determined that the district "Needs Assistance" under IDEA Part B. ⁴³

A. Strategic Planning, Implementation, and Monitoring

The Vision-Versus-Reality Gap

The district's foundational documents, the 2024 Strategic Plan ³ and the Student Opportunity Act (SOA) Plan, ⁴ present a robust and commendable vision for equity. The Strategic Plan is built upon a "long standing belief that every child has the potential to achieve academic excellence" and explicitly names as a priority the need to "strengthen supports for multilingual learners and special education students." ³ It commits to developing a "comprehensive system to disrupt persistent disparities" and to "deploy district resources based on student need." ³ Similarly, the SOA Plan identifies students with disabilities as a group requiring "focused support for rapid improvement" and commits to evidence-based programs like "High-Leverage Practices for Students with Disabilities." ⁴

This articulated vision is in direct and stark contradiction to the district's actual performance data and the lived experiences of its students and staff. The district's overall accountability classification of "Moderate progress toward targets" ² obscures a deeply troubling reality for its most vulnerable students. According to detailed 2024 accountability data, the "Students w/ disabilities" subgroup is not making progress but is actively regressing in key areas. ² In non-high school English Language Arts (ELA), their achievement has "Declined," and in high school mathematics, their progress is categorized as "Low Growth." ² This is not a failure to meet ambitious targets; it is a failure to prevent regression and a clear indicator of a critical breakdown in the "Implementation and Progress Monitoring" of the district's strategic vision. ³

The recent DESE determination of "Needs Assistance" with a score of 73% (30 out of 41 possible points) provides official confirmation of these failures. ⁴³ The determination is a direct result of the district's inability to meet compliance and performance targets, which underscores the credibility of the concerns raised in this report.

This disconnect between planning and execution suggests that the district's high-level strategic documents may function more as performative artifacts than as genuine drivers of operational change. The district has correctly identified shortcomings and named the target populations in its plans. However, the persistent and severe nature of the issues described in public testimony reveals a failure to translate these plans into funded, staffed, and monitored actions. Public comments from May 2025 School Committee meetings describe a system where legally mandated services are not being provided. ^{14 15 16} Parent and employee Angelique Santomauro testified that her sixth-grade son's mandated "pullout service" under his Individualized Education Program (IEP) "had not been happening since September because the district was unable to hire a special education teacher." ^{14 15} This is not an administrative oversight; it is a fundamental failure of the system. Seventh-grade teacher Cesar Urrunaga corroborates this systemic failure, stating, "many students are going without services on a regular basis...they are not getting what they should and are required by law." ^{14 15} When a district's strategic plans promise to "strengthen supports" while simultaneously failing to provide the most basic, legally required services, the plans themselves lose credibility and become symbols of a leadership and governance structure that is not effectively connected to the realities of its schools and classrooms.

This failure of leadership to meaningfully partner with key stakeholders is further evidenced by a pattern of communication breakdown with the Somerville SEPAC. Massachusetts law requires that the SEPAC advise the school committee and participate in the planning, development, and evaluation of special education programs. ¹⁷ However, correspondence shows SEPAC leadership repeatedly requesting meetings and information with little to no response. ^{18 19} In a February 2025 email, SEPAC leadership noted that a promise from Superintendent Carmona for an update on how SEPAC could uphold its advisory role had gone unfulfilled. ¹⁹ This same email followed up on a prior, unanswered letter from January 2025 that requested a budget timeline (first requested in June 2023), clarification on SEPAC's involvement in hiring committees, and information on the district's compliance with Child Find law. ¹⁹ On June 6, 2025, a meeting took place between members of the School Committee and SEPAC officers. While this meeting was a step toward collaboration, a formal agreement for meaningful SEPAC participation has not yet been established. SEPAC officers conveyed that, at present, they "are not invited to the table" and that a suggestion to limit engagement to two-minute public testimonies "does not qualify as participation." ²⁰ The district's failure to proactively and meaningfully engage with its legally mandated parent advisory council indicates a significant flaw in its governance and stakeholder engagement practices. We are seeking guidance from DESE to facilitate future SEPAC participation and collaboration with the district.

Furthermore, this lack of coherent implementation extends to the school level. The district has a responsibility to guide the development of School Improvement Plans (SIPs) to ensure they align with district priorities. ¹ However, an analysis of the SIPs reveals significant inconsistency. The Winter Hill SIP, for instance, correctly identifies its high-needs population, including a focus on students who are dually identified as having a disability and being a multilingual learner, and builds its goals around this reality. ¹³ In contrast, the Argenziano SIP does not name students

with disabilities as a specific focus group, despite data showing poor outcomes for this population at school. ⁵ This variability suggests a lack of a unified, district-led strategy to ensure that school-level planning is rigorously and consistently focused on closing the most significant and persistent equity gaps.

B. Superintendent Evaluation: A Disconnect Between Praise and Performance

A critical component of district leadership and governance is the evaluation of its chief executive. The 2024 End-of-Cycle Summative Evaluation for Superintendent Rubén Carmona reveals a profound disconnect between the School Committee's assessment of leadership performance and the district's deeply troubling student outcome data. ^{30 31 32 33 34 35 36 37} The official narrative of success, as captured in these evaluations, stands in stark contrast to the operational reality of crisis and non-compliance documented throughout this report. The combined evaluation from the School Committee rated the Superintendent as "Proficient" overall, with most members giving ratings of "Met" on his Professional Practice and Student Learning goals, and "Significant Progress" on the District Improvement goal. ³⁰ The commentary is overwhelmingly positive, with evaluators praising the Superintendent as an "exceptional instructional leader" who has made "transformational improvements to curriculum and instruction" ³⁵ and "earned the support and respect of the staff and community." ³⁴ The primary themes highlighted by committee members focused on the "commitment to continuous improvement" and "improvements to curriculum and instruction." ^{30 31 32 33 34 35 36 37}

This glowing assessment is irreconcilable with the district's actual performance data. As previously noted, students with disabilities are experiencing a "Declined" trajectory in ELA achievement and "Low Growth" in high school math. ² They face a staggering 41-point proficiency gap in ELA and a 37-point gap in math. ² This data, combined with the extensive testimony from educators and parents about the systemic, daily failure to provide legally mandated IEP services, ^{14 15 16} paints a picture of a district in crisis, not one led by a "Proficient" administration that has "Met" its student learning goals.

This discrepancy points to a flawed evaluation framework that prioritizes administrative processes over student outcomes. The Superintendent's "Student Learning Goal" was to "enhance the alignment of our instructional systems so that all students benefit from rigorous, engaging, and linguistically and culturally affirming learning experiences." ³⁸ This is a process goal, not an outcome goal. It can be marked as "Met" based on the implementation of new curricula or planning frameworks, even as student achievement for the most vulnerable populations declines. One evaluator acknowledged this gap, stating, "While we are not yet seeing dramatic improvements to test scores and other outcome measures, we have a formal literacy curriculum in our middle schools for the first time..." ³⁴ This comment encapsulates the problem: **the evaluation rewards the *creation of systems* rather than the *results of those systems*.**

It is notable that two committee members dissented from the overwhelmingly positive consensus. Evaluator Leiran Biton rated the Superintendent as "Needs Improvement" overall and on Instructional Leadership, specifically citing the need for "Evaluation of special education programs and supports...in light of data from community survey" and "Support of differentiated learning supports in inclusive classrooms." ³² Evaluator Ellenor Barish also rated Instructional Leadership as "Needs Improvement," commenting, "I think it is going to take more time to fully achieve these outcomes in a way that would 'ensure' the desired outcomes are being achieved." ³¹ These minority opinions align far more closely with the district's performance data and the lived experiences of its families.

Ultimately, an evaluation process that allows leadership to be rated as "Proficient" while the district is engaged in widespread non-compliance with federal special education law is not a tool for accountability; it is a mechanism for avoiding it. It signals that the catastrophic failure to educate students with disabilities is not a sufficiently important metric in assessing leadership effectiveness. For true accountability, the Superintendent's evaluation must be directly and rigorously tied to measurable improvements in the academic proficiency and legal rights of *all* student groups, especially those the district is currently failing.

II. Curriculum and Instruction

The Curriculum and Instruction standard evaluates whether "curricular materials and classroom instruction are central to student learning, opportunities, and outcomes" and if the district "pairs high expectations with individualized supports so that every student can engage in deeper learning" ⁴. For students with disabilities in Somerville, systemic barriers related to staffing, program implementation, and resource allocation prevent consistent and equitable access to grade-level curriculum and effective, specially designed instruction. The result is a system that, despite its inclusive rhetoric, perpetuates and exacerbates academic segregation and failure.

A. Equitable Practices and Access

The Illusion of an Inclusion Model

Somerville Public Schools publicly commits to an "inclusion model" of service delivery for students with disabilities, noting that 70% of special education placements are full-inclusion. ³⁹ The core principle of inclusion is that students with disabilities are educated alongside their non-disabled peers in general education settings to the maximum extent appropriate, with the provision of necessary supplementary aids and services. However, extensive testimony from educators reveals that the district's model is, in practice, an unfunded mandate—a philosophical preference without the required resources to make it viable or legal. ^{14 15 16}

This systemic failure is vividly illustrated by the experiences of classroom teachers. Educator Katarina Dutton described a colleague with dual certifications in math and special education

who is forced to "solo teach her inclusion classroom," a class that is designated to have two teachers. They argue this practice is **"cheating some of our most vulnerable students"** whose IEPs state "they need the services of two separate teachers" and are "legally obligated to have two educators in a room." ^{14 15} This is not inclusion; it is a reduction of services disguised as an integrated model. Similarly, fourth-grade teacher Ray Woodcock explained that the district "phased out" more restrictive sub-separate classrooms "without provid[ing] us with any sort of transition plan to support greater needs in our general education classrooms." As the sole teacher for 21 students, including five with academic IEPs and four who are "complete non-readers and non-writers," they state it is "physically impossible" to attend to everyone's needs, leaving the most vulnerable students "at a complete loss." ^{14 16}

The direct consequence of this hollowed-out inclusion model is a catastrophic failure to provide students with disabilities meaningful access to the general curriculum. The district's own data confirms this reality with devastating clarity. The 2024 MCAS results show a staggering **34-percentage-point proficiency gap** in Grade 03-08 ELA between students with disabilities (12% proficient) and their non-disabled peers (46% proficient) ². The gap in Grade 03-08 Math is **28 percentage points** (10% proficient vs. 39% for their non-disabled peers) ². These are not mere achievement gaps; they are evidence of a system that is failing to teach a vast majority of its students with disabilities. When 90% of a subgroup of students in grades 3-8 are not proficient in math, ² it is a direct indictment of the instructional program they are being offered. The SEPAC highlights this disparity in its budget response, noting that these outcomes beg the question of whether the district is following IDEA's mandate for high expectations and access to the general curriculum. ²⁴ The group further argues that the "year-to-year compliance-oriented approach" of IEPs "often lacks flexibility and is not proactive, thus widening achievement gaps." ²⁴ This lack of proactive partnership is further exemplified by SEPAC's experience with curriculum selection, where they were only included in an ELA Curriculum Selection overview after the selection had already been narrowed down to 3 selections, and were not meaningfully included in the decision process.

This systemic failure to provide the necessary supports, such as co-teachers and specialists, for students with disabilities to access and make progress in the general education curriculum is a fundamental violation of the Individuals with Disabilities Education Act (IDEA). IDEA requires not only placement in the Least Restrictive Environment (LRE) but also the provision of a Free Appropriate Public Education (FAPE), which includes the specially designed instruction and related services necessary to enable the child to be involved in and make progress in the general education curriculum. When the "inclusion model" results in students being physically present but instructionally abandoned, the district is failing on all counts.

B. Support for Historically Underserved Students

The district's SOA Plan commits to implementing "High-Leverage Practices for Students with Disabilities" as a key evidence-based strategy. ⁴ The foundation of this commitment is the delivery of specially designed instruction (SDI) by qualified personnel. Yet, the overwhelming

evidence from public testimony demonstrates that this foundation is crumbling due to a district-wide staffing crisis. The promise of high-leverage practices is rendered meaningless when there are not enough special educators, counselors, or interventionists to deliver practices.

The testimony from frontline staff is a chronicle of this systemic breakdown:

- A resource room teacher, Kara Dodd, explained that the time she must spend completing academic evaluations for the district forces her to make daily "data-driven decisions" about "which students to not serve." [14 15](#)
- An adjustment counselor, Alex Scheman, meticulously tracked her time and reported missing **219 services**, equating to **6,570 minutes of missed, legally required counseling time** in a single school year because she was pulled to proctor MCAS or attend IEP meetings. [14 16](#)
- A math interventionist, Jenna DiNovis, described her role at East Somerville Community School as "logistically impossible," stating she can only **serve, at best, "one-third" of the students who need her support.** [14 15](#)

The Somerville Special Education Parents Advisory Council (SEPAC) presented the results of their '23-'24 parent survey, [42](#) highlighting areas for improvement in the special education system. The survey gathered feedback from 105 families across nine schools, representing approximately 8% of students with disabilities in the district. [42](#) The findings reveal a significant disconnect between the needs of students with disabilities and the support and services provided.

Some key results from the survey include:

- 53% of respondents were dissatisfied with their overall experience with Special Education in Somerville Public Schools. [42](#)
- 62% of respondents were dissatisfied with the quantity and quality of communication from SPS regarding their student's special education services. [42](#)
- 84% of families with IEPs/504s are seeking support outside of Somerville Public Schools. [42](#)
- 68% of respondents were dissatisfied with the process of seeking initial qualification for an IEP or 504 plan. [42](#)
- Only 26% of participants who qualified for Extended School Year (ESY) services actually participated, with common barriers being poor or last-minute communication and inadequate programming. [42](#)

Parent responses from this survey are evidence of the systemic issues the district faces in providing FAPE for students with disabilities: [42](#)

- One parent stated "...We asked for a listing of all sessions and found **20% were missed.**" [42](#)

- Another parent stated “We know for a fact, as documented by our child’s IEP team they are not administering my child’s IEP as written. **Missed services for many years.**” ⁴²

This evidence points to a Multi-Tiered System of Support (MTSS) that is broken. The district’s Strategic and SOA Plans identify MTSS as the central framework for providing tiered academic and behavioral support. ³⁴ In a functioning system, MTSS provides a seamless continuum of interventions. In Somerville, it appears to be a bottleneck. The lack of staff to provide Tier 2 and Tier 3 interventions creates a system where students’ needs are identified but not met. The SEPAC corroborates this concern, noting that “All students within SPS do not have equitable access to screeners and a tool necessary to initiate MTSS support,” pointing out that math screeners are only performed in schools with interventionists and only in the grades they can serve. ²⁴

The compounding effect of these multiple, overlapping systemic failures is most acute for students with the most complex needs, particularly those who are dually identified as having a disability and being a multilingual learner. These students require a high degree of coordinated, specialized support from both ESL and special education professionals. However, the evidence shows that both systems are failing them simultaneously. The East Somerville SIP acknowledges that due to “limited ESL staff,” middle school multilingual learners “receive MLE services about half of the time.” ⁸ This is happening at the same time that special educators are being pulled from classrooms and services are being missed. For a dually-identified student, this creates an almost insurmountable barrier to accessing grade-level content. The failure in one system is not compensated for by the other; rather, the failures compound, trapping the student in a cycle of academic neglect. This dual failure provides a clear explanation for the abysmal proficiency rates for both English Learners (1% in Grade 03-08 ELA) and Students with Disabilities (12% in Grade 03-08 ELA) , and it represents the district’s most profound equity crisis. ²

III. Assessment

The DESE Assessment standard focuses on the district’s capacity to collect and use a variety of data points to “inform decisions at the classroom, school, and district levels” and to “advance equitable student experiences and outcomes.” ¹ While Somerville Public Schools collects a wide range of data, a critical analysis reveals a disconnect between data collection and meaningful action, particularly for students with disabilities. Furthermore, serious concerns have been raised regarding the integrity of the district’s assessment and evaluation processes, suggesting potential non-compliance with federal law.

A. Data Use and Culture

The district’s assessment data paints a clear and alarming picture of the state of special education. The 2024 accountability data shows that in non-high school ELA, the average composite scaled score for students with disabilities declined by 1.2 points from the previous

year.² In high school mathematics, this subgroup's progress was designated as "Low Growth."² MCAS scores show that proficiency rates for students with disabilities in grades 3-8 hover at just 12% in ELA and 10% in Math.² The district acknowledges these profound disparities in its SOA Plan, identifying students with disabilities as a key subgroup for targeted improvement.⁴

The critical failure, therefore, is not just in the collection of data but also in the *use* of that data to drive meaningful and timely change. The DESE standard requires that districts use data to inform "strategic planning, decision-making, policies, and practices" and to engage in "regular cycles of data review and adjustments to instruction."¹ **For years, the data has consistently shown that students with disabilities are being left behind. Yet, the systemic root causes of this failure—chronic understaffing, an under-resourced inclusion model, and an inadequate budget—remain unaddressed.** The powerful testimony from the May 2025 School Committee meetings demonstrates that the same crises of service delivery that produced these poor outcomes persist today.^{14 15 16} This indicates a significant breakdown in the district's continuous improvement cycle. **A robust data culture does not simply identify the problem; it acts upon it with urgency.** The district's inability to translate years of alarming data into the fundamental resources needed to serve its students with disabilities points to a failure of leadership and a data culture that is more passive than proactive.

B. Assessing for Equity: Child Find and Evaluation Integrity

The assessment process for students with disabilities begins long before standardized tests like the MCAS. It starts with the district's legal obligation under IDEA known as "Child Find," which requires districts to identify, locate, and evaluate all children who may have a disability and need special education services. The SEPAC has formally requested clarification from the district on how Somerville Public Schools (SPS) complies with the Child Find law.¹⁵ No response directly to the SEPAC was received. The Director of Special Education Ildefonso Arellano did write a Child Find Memo to the School Committee on April 3, 2025.⁴⁰ While this memo explains the basics of what is required of the district for Child Find. The memo falls short of adequately addressing the actual processes, training, and accountability mechanisms critical to a robust Child Find System. While the memo mentions teachers and administrators are "actively involved"⁴⁰ in identifying struggling students and referring them for evaluation, it does not outline the specific protocols of steps taken within individual schools. There is also no mention of the training provided to teachers, administrators, and other school staff to effectively identify students with suspected disabilities, understand their roles in the referral process, or how they are trained to navigate the Multi-Tiered Systems of Support (MTSS) framework effectively. The memo also lacks any information on how the district ensures accountability for their Child Find responsibilities. This lack of transparency, combined with educator testimony that the district takes advantage of the fact that many families "do not know how to navigate the system and advocate for their children,"^{14 16} raises serious questions about whether the Child Find process is functioning equitably or effectively. Using MTSS as a barrier to, rather than a pathway toward, evaluation is a violation of federal guidelines.

Furthermore, the integrity of the evaluation process itself appears to be compromised by the district's staffing crisis. Kara Dodd, a resource room teacher, provided a stark account of this conflict, stating that the overwhelming amount of time she must spend completing academic evaluations for the district forces her to make daily decisions about "which students to not serve." ^{14 15} This creates an untenable situation where the act of assessing students directly prevents the delivery of services to other students. It places an unacceptable burden on educators and creates a systemic barrier that impedes both initial evaluations for eligibility and the re-evaluations necessary to monitor progress and adjust services. This practice is not only inefficient but also deeply inequitable, as it rations access to the very processes designed to secure students' rights.

The results of the SEPAC Parent Survey ⁴² also highlights a system that doesn't meet it's Child Find obligations:

- As one parent responded **“Our initial IEP process took over a year to complete, which is illegal...”** ⁴²
- Another parent responded "There are specific individuals working in Special Education at SPS who are amazing. However they are not given the resources they need and this results in a **competitive bloodbath among families over who gets services and who gets turned away**, and burnout among the educators due to overwork and needing to tell families "no" over and over again." ⁴²

The following table provides a stark, quantitative summary of the academic crisis facing students with disabilities in Somerville, illustrating the direct consequences of the systemic failures in instruction and support.

Table 1: 2024 MCAS Proficiency Gaps: Students with Disabilities vs. Non-Disabled Students

Subject Area (Grades 3-8)	% Proficient (Meeting + Exceeding) - Students w/ Disabilities	% Proficient (Meeting + Exceeding) - Non-Disabled	Proficiency Gap
English Language Arts	12%	46%	-34 points
Mathematics	10%	39%	-29 points

Source: Massachusetts DESE. 2024. “2024 Assessment and Accountability Data - Somerville (02740000).” DART for Districts and Schools.
<https://profiles.doe.mass.edu/accountability/report/district.aspx?linkid=30&orgcode=02740000&orgtypecode=5&>

IV. Human Resources and Professional Development

This standard evaluates the district's ability to "effectively recruit, hire, onboard, and support a highly effective, diverse, and culturally responsive workforce" ¹. The evidence from Somerville Public Schools points to a systemic and acute staffing crisis, particularly within special education, that serves as the primary driver of the district's non-compliance with IDEA. The district's inability to adequately staff its schools has created unsustainable working conditions, leading to a cycle of attrition that further destabilizes services for the district's most vulnerable students.

A. Staffing: Recruitment, Hiring, and Retention

The public record is replete with testimony from parents and educators detailing the district's chronic failure to staff its special education programs. This is not a matter of a few difficult-to-fill positions but a systemic inability to provide the baseline number of professionals required to deliver legally mandated services. Testimony from the May 2025 School Committee meetings reads as a catalog of this crisis:

- A parent and employee was explicitly told that the district was **"unable to hire a special education teacher"** to provide her son's IEP services, which had been denied since the beginning of the school year. [14 15](#)
- A seventh-grade teacher stated flatly, **"special educators are not in the classrooms when they need to be"** because "we do not provide special educators" in sufficient numbers, leading to shared staff and uncovered absences. [14 15 16](#)
- A fifth-grade teacher at East Somerville reported, **"We do not have enough staff to service our students,"** a situation so dire that it dictates how IEPs are written—based on staff availability rather than student need. [14 15 16](#)
- An educator at Winter Hill witnessed students **"eligible for services and are not receiving them"** because "we do not have enough educators to provide the interventions they need." [14 15 16](#)

The results of the SEPAC Parent Survey [42](#) also highlight a system that give educators the resources they need to meet the needs of our students:

- As one parent responded **"the incentives are to provide the bare minimum"** [42](#)
- Another parent responded about Extended School Year (ESY) services **"Last minute, under qualified educators that don't know my child nor their profile,** the services are a pass at going through the motions but not provide any actual support to acquire new skills of prevent summer learning loss."

This staffing crisis has, in turn, created untenable working conditions that undermine the

district's ability to retain the qualified staff it does have. The DESE standard emphasizes the importance of fostering a "positive, productive, and inclusive work environment" to promote retention ¹. However, the reality in Somerville is one of burnout and exploitation. Educator Katarina Dutton described how the district "takes advantage of some of our most experienced educators" by forcing a single, dual-licensed teacher to perform the work of two full-time professionals. They correctly identifies the outcome of this practice: "How much money will it save when those educators transfer to Boston... to Watertown... to all cities that pay higher than we do?" ^{14 15 16} This creates a vicious cycle: staff shortages lead to overwhelming caseloads and improper assignments, which in turn drive experienced educators out of the district, exacerbating the initial shortages.

The district's own Strategic Plan acknowledges a "desire for a more diverse and representative staff," ³ and its SOA Plan commits to "Increasing Enhanced Pathways To Increase Educator Diversity." ⁴ While these are admirable goals, they are fundamentally unattainable in the current environment. The district cannot hope to build a diverse and stable workforce when it fails to provide the basic funding and working conditions necessary to retain its current staff. This concern is shared by the SEPAC, which has formally requested clarification on its involvement in hiring committees and has asked for the district to provide its best practice hiring guidelines, indicating a desire from stakeholders to be part of the solution to the district's staffing challenges. ^{18 19}

B. Educator Assignment and Evaluation

The district's staffing failures lead directly to improper assignments that violate the spirit and letter of special education law. The practice of using one dual-licensed teacher to cover both a content area (math) and a special education role within an inclusion classroom that is legally designated for two separate teachers is a clear example of non-compliance. ^{14 15 16} This is not a "creative" or "flexible" staffing solution; it is a cost-saving measure that deprives students of their legally mandated level of support. It fundamentally alters the nature of the inclusion setting, transforming it from a supported environment into one where students with disabilities are left to fend for themselves.

Ultimately, this human resources crisis is one of the causal factors behind the district's failure to provide FAPE to its students with disabilities. Without a sufficient number of licensed and qualified special education teachers, adjustment counselors, behavioral specialists, interventionists, and related service providers IEPs become unenforceable documents. Without adequate staff, services cannot be delivered, progress cannot be made, and special education students are left behind. The connection between the educator testimony ^{14 15 16} and the devastating student achievement data ² is direct, causal, and undeniable. The failure to adequately staff the district is a failure of human resources, a failure of financial management, and, most critically, a failure of leadership to uphold the law.

C. Professional Learning

The Somerville Special Education Parent Advisory Council (SSEPAC) has identified several concerns regarding the professional development (PD) opportunities available to educators, particularly concerning special education⁴¹. While most children with IEPs in Somerville are in Full or Partial inclusion placements, there has been a long-standing unmet request from General Education teachers, paraprofessionals, and School Administrators for consistent PD offerings specific to incoming students with disabilities. Families surveyed by SSEPAC reported experiences with staff and educators who were ill-equipped or ill-prepared to work with children with disabilities in the General Education setting.⁴²

- One parent noted in the SEPAC survey **“Many of the staff have outdated and incorrect knowledge regarding autism, autism support and accommodations, and their effectiveness and potential harm, gestalt language processing, sensory processing differences, trauma informed therapy, and neurodiversity affirming practice. Many of the views and statement[s] during my child’s evaluation were offensive, incorrect or ableist.”**⁴²

Upon reviewing the 2024-2025 Professional Development Catalog, SSEPAC noted a perceived lack of PD for working with students with disabilities beyond grade 3 and requested confirmation of this interpretation.⁴¹ They also highlighted discrepancies between course descriptions and target audiences; for example, "Creating Adaptive Materials to Meet the Needs of Diverse Learners" lists PK-8 educators as the target audience, but the materials described are appropriate for students in PK-2.⁴¹ Furthermore, disability-specific training appears to be missing, raising questions about how general education teachers and staff are prepared to support incoming students with specific disabilities (e.g., Autism, Down Syndrome), and how they are instructed to modify and adapt curriculum for children with learning or intellectual disabilities. SSEPAC has requested more detailed information to provide meaningful recommendations to the District and seeks clarity on the data to fulfill its advisory and participatory role.⁴¹

V. Student Support

The Student Support standard examines the systems a district has in place to ensure a "safe and supportive school climate and culture," to support student "health and wellbeing," and to implement a "Multi-Tiered System of Support (MTSS)" that is responsive to student needs."¹ However, based on educator public comments, Somerville Public Schools is engaged in a pattern of systemic non-compliance with the Individuals with Disabilities Education Act (IDEA), resulting in the widespread denial of a Free Appropriate Public Education (FAPE) for its students with disabilities.^{14 15 16}

A. Systemic Non-Compliance with the Individuals with Disabilities

Education Act

The evidence gathered from public testimony provided by parents and educators reveals a troubling and consistent pattern of failure to meet the most fundamental requirements of federal and state special education law. These are not isolated administrative errors or the complaints of a few individuals; rather, they are corroborating accounts from numerous stakeholders across different schools that point to systemic issues.

Failure to Implement IEPs / Denial of FAPE

The cornerstone of IDEA is the Individualized Education Program (IEP), a legally binding contract that outlines the specific services and supports a district must provide to a student with a disability. The failure to implement this contract constitutes a denial of FAPE. The testimony from the May 2025 School Committee meetings provides extensive, specific, and credible evidence of this failure: [14 15 16](#)

- **Direct Denial of Services:** Parent and employee Angelique Santomauro testified that her son's mandated pullout service had not been provided since September due to the district's failure to hire a special education teacher. [14 15](#) This is a clear, months-long violation of a specific IEP provision.
- **Systemic Lack of Staff:** Multiple educators confirmed this is a systemic issue. Cesar Urrunaga stated, "**many students are going without services on a regular basis.**" [14 15](#) Eleanore MacLean echoed this, reporting that students "eligible for services... are not receiving them" because there are "not enough educators." [14 15 16](#)
- **Triage of Legally Mandated Support:** The staffing shortage forces educators into the impossible position of rationing legally required services. Resource room teacher Kara Dodd testified that her evaluation duties force her to decide "which students to not serve." [14 15](#) Adjustment counselor Alex Scheman provided precise data on this triage, reporting **6,570 minutes of missed, legally-obligated counseling time** in a single year as she was pulled for other tasks. [14 16](#)
- **IEPs Written to Fit Staffing, Not Student Needs:** The evidence shows a system that is failing students with disabilities. Fifth-grade teacher, Naina Sood Fox, stated, **Our IEPs are written not with students' needs at the forefront, but rather with how our service providers can stretch their schedules to accommodate them.**" [14 16](#) This practice fundamentally inverts the entire purpose of the IEP process and is a profound violation of IDEA. Our children's futures are not supposed to be dictated by what's convenient for a system that's understaffed.

Educator public testimony consistently corroborates the long-standing experiences and suspicions of parents and families regarding the systemic issues within Somerville Public Schools. This testimony provides a critical, firsthand account of the challenges faced in delivering a Free Appropriate Public Education (FAPE) to students with disabilities. Further evidence of the systemic issues the district faces in providing FAPE for students with disabilities

is found in parent responses from the SEPAC survey. ⁴² These responses paint a clear and concerning picture of the district's shortcomings, echoing and expanding upon the narratives shared by educators:

- **Unsafe schools:** One parent described how their child was “...**scared to return to school**, lost confidence in his teacher’s ability to help him and keep him safe.” ⁴²
- **Low Student Confidence:** Another parent said their child feels “...**like everyone knows how to read but her**.” ⁴²
- **Insufficient Services:** In regards to ESY one parent shared “**The services are laughable**. One 30 minute session per week when my child needs a full time summer program!” ⁴²

Educator testimonies and SEPAC survey responses collectively present strong evidence for an immediate, comprehensive district review and reform. This is crucial to guarantee that all eligible students receive a Free Appropriate Public Education (FAPE). Consistent qualitative and quantitative data from public testimonies and parent surveys reveal systemic deficiencies in Somerville Public Schools' student support systems, especially concerning IDEA compliance. The documented negative impact on student well-being due to unfulfilled IEPs highlights the urgent need for comprehensive intervention to address the pervasive denial of FAPE.

Failure to Provide Services in the Least Restrictive Environment (LRE)

IDEA mandates that students with disabilities be educated with their non-disabled peers to the maximum extent appropriate. This is known as the Least Restrictive Environment (LRE). However, an inclusive placement is only appropriate if the necessary supplementary aids and services are provided. The district's under-resourcing of its inclusion model directly undermines the LRE mandate. When a general education classroom lacks the required special education co-teacher or paraprofessional support, it ceases to be an appropriate placement for a student whose IEP requires that support. As described by fourth-grade teacher Rae Woodcock, students with significant needs are left in general education classrooms without adequate support, making it “physically impossible” to meet their needs. ^{14 16} This is not a successful inclusion program; it is a failure that denies students the support they need to succeed in the LRE.

Erosion of Procedural Safeguards and Parental Rights

IDEA establishes strong procedural safeguards to ensure that parents are equal partners in the educational decision-making process for their children. Testimony suggests an erosion of these rights. The district's failure to respond to SEPAC's requests for collaboration, combined with educator testimony that the district “takes advantage of the fact that many of our families...do not speak English as a first language, do not know how to navigate the system and advocate for their children,” ^{14 16} points to a systemic disregard for the procedural safeguards that are designed to protect families and ensure their meaningful participation. When students “fall through the cracks” because their families cannot navigate a complex and unresponsive

system, their rights have been violated.

The long-term consequences of these systemic failures are borne by the students themselves. The academic struggles documented in MCAS scores ² inevitably translate into diminished life opportunities. The district's accountability data shows that students with disabilities are not being adequately prepared for post-secondary success.

VI. Financial and Asset Management

A district's budget is its most definitive policy statement, revealing its true priorities. The DESE standard requires that the School Committee "strategically aligns resource allocations...to both improve student learning experiences and outcomes and reduce disparities for historically underserved groups" ¹. In Somerville, the gap between the district's stated commitment to equity and its budgetary decisions is the central point of failure, with direct and severe consequences for students with disabilities.

The public debate surrounding the budget clearly highlights a significant conflict. The administration has proposed what it terms a "level service" budget; however, stakeholders widely assert this term is a misnomer. Based on public testimony ^{14 15 16} and parent feedback ⁴² the district is already failing to meet its legal obligation to provide services and ensure all students receive a Free Appropriate Public Education (FAPE). Given rising costs, contractual salary increases, and escalating student needs, a level-service budget functions as a reduction in resources, preventing the district from hiring the staff necessary to address its most critical shortfalls. ^{21 22} The SEPAC formally requested a budget timeline and detailed special education figures to ensure its participatory role was honored. Unfortunately, the information provided lacked the necessary detail and transparency for the SEPAC to meaningfully evaluate the proposed budget. ^{23 24}

This is not merely a philosophical debate about spending priorities; it is a matter of legal compliance. The extensive public testimony makes it unequivocally clear that the current funding and staffing levels are insufficient to implement student IEPs, a non-negotiable mandate under the Individuals with Disabilities Education Act (IDEA). The administration's position that a level-service budget is adequate is untenable when weighed against the evidence: ^{14 15 16}

- An adjustment counselor, Alex Schieman, reported missing **6,570 minutes** of legally required counseling time for students on her caseload due to being pulled for other duties. ^{14 16}
- A special education teacher, Kara Dodd, testified that her workload forces her to decide "which students to not serve." ^{14 16}
- A fifth-grade teacher, Naina Sood Fox, stated that **IEPs are written "not with students' needs at the forefront"**, but rather with how our service providers can stretch their schedules to accommodate them." ^{14 16}
- A middle school teacher, Melissa Moore, described being alone in a class with 25

students, including many multilingual learners, and feeling that she was **"actively failing those students"** without the support of a co-teacher. [14](#) [16](#)

- A special educator, Kelsey LaMagdalene stated "Our unpaid labor patches over many systemic gaps, but the gaps keep growing. **We know that we need more staff for a true inclusion model, yet the mayor refuses to budget for it.**" [14](#) [16](#)
- A parent response from the SEPAC survey when responding to a survey question about caregiver confidence said the district was **"Not wanting to meet our child's needs due to budget constraints**, leading on behavioral [interventions] which makes things worse not individualized to our child." [42](#)

When a district's budget is so inadequate that it forces staff to triage legally mandated services and write IEPs based on staff availability rather than student need, the School Committee has failed in its primary governance responsibility. Also alarming, was the lack of knowledge of these issues by administration and School Committee prior to public testimony. This is evidence of a culture and system that doesn't solicit feedback from Educators and families. The failure to allocate the necessary funds to hire and retain sufficient special education staff is a direct cause of the district's widespread non-compliance with federal law. In its formal response to the FY25/26 budget, the SEPAC underscores this point, questioning whether the core principles of IDEA are being followed when proficiency rates for students with disabilities are so low and recommending that the district "lead by example rather than rely on minimum compliance." [24](#)

This failure of equitable resource allocation extends to physical assets. The prolonged and well-documented crisis at the Winter Hill Community Innovation School (WHCIS) is a case study in institutional neglect. For years, educators and families raised alarms about the building's deteriorating condition. In February 2022, staff submitted a petition regarding falling ceiling tiles, and in May 2022, another petition highlighted extreme classroom temperatures exceeding 95 degrees. [14](#) [15](#) Despite these warnings, the city's subsequent three-year capital improvement plan did not include the Winter Hill building. The crisis culminated in June 2023 when a piece of concrete fell into a stairwell, forcing the building's emergency closure. [25](#) [26](#)

The closure has had a devastating impact on the school community, particularly its most vulnerable students. WHCIS houses the district's sub-separate AIM program for autistic students, a specialized program requiring a stable and supportive environment. [27](#) The displaced students and staff were moved to the Edgerly Education Center, but this "temporary" solution created further chaos. Asbestos was discovered at Edgerly, disrupting federally mandated summer programming for students with disabilities. [28](#) Teachers at the Edgerly location report ongoing issues, including **"mice running around our carpets" and a "maggot infestation."** [14](#) [15](#) [16](#) The city's lack of a formal "swing space" plan for such emergencies was starkly revealed by the WHCIS situation. [21](#)

The neglect of the original building has continued even after its closure. In May 2025, the vacant school was the site of a suspicious fire, with investigators finding three separate points of origin inside the vandalized building. [29](#) This entire saga—from years of ignored warnings to a chaotic

relocation and a fire in the abandoned building—represents a profound failure to provide a safe, stable, and appropriate learning environment. It is a direct violation of the district's commitment to "Ensure access to safe, welcoming and inclusive facilities" ³ and sends a clear message about which students' needs are prioritized and which are deferred, further widening the gap between the district's stated values and its actions.

VI. Conclusion


Summary of Findings

This analysis of Somerville Public Schools, conducted through the framework of the DESE District Standards, reveals a district at a critical crossroads. On one hand, SPS has developed a strategic plan that articulates a clear and commendable vision of equity, access, and support for all learners. On the other hand, a body of evidence—drawn from the district's performance data, the state's accountability system, and, most powerfully, the direct testimony of the parents and educators on the front lines—demonstrates systemic failure to translate that vision into reality for students who are high needs, have disabilities, are multilingual learners, or low income. The district is operating a dual system. The aspirational system, found in the Strategic Plan and Student Opportunity Act (SOA), promises to "disrupt persistent disparities" and provide "high-leverage practices" for students with disabilities. ³⁴ The operational system, however, is defined by systemic under-resourcing, a chronic and debilitating special education staffing crisis, and widespread, documented non-compliance with the fundamental tenets of the Individuals with Disabilities Education Act. This has resulted in indefensible achievement gaps, the denial of legally mandated services, and the erosion of trust with the families the district is meant to serve. The issues identified in this report are not isolated incidents but symptoms of a deep and pervasive structural breakdown that requires urgent and decisive action from district leadership.

Appendix A: Special Education Non-Compliance Spreadsheet

This spreadsheet contains specific, documented instances of non-compliance compiled from public testimony. The areas of non-compliance are aligned with DESE's Universal Standards (CR) and Targeted Standards (SE), which are based on the following state and federal regulations:

- **Special Education (SE):** Selected requirements from the federal Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1400 et seq and accompanying regulations at 34 CFR Part 300; Massachusetts General Law Chapter 71B; and the Massachusetts Special Education regulations (603 CMR 28.00).
- **Civil Rights Methods of Administration and Other General Education Requirements (CR):** Specific requirements from federal civil rights laws, including the Every Student Succeeds Act (ESSA), Title VI of the Civil Rights Act of 1964, the Equal Educational Opportunities Act of 1974, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990. This also includes select state requirements under M.G.L. c. 76, § 5; M.G.L. c. 269 §§ 17 through 19; and Massachusetts regulations governing Physical Restraint (603 CMR 46.00), Student Learning Time (603 CMR 27.00), and Student Records (603 CMR 23.00), among other federal and state laws.

 Special Education Noncompliance Spreadsheet

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