



City of Boston, Massachusetts
Office of the Mayor
MICHELLE WU

March 18, 2026

TO THE CITY COUNCIL

Dear Councilors:

This is the response to the 17F: Order requesting certain information under Section 17F relative to BPS student-athlete school transfer policies. (**Docket #0698 passed by Council on 4/1/2026**).

Sincerely,

Michelle Wu
Mayor of Boston

1. SARB Investigation Policies and Framework

a. Provide information on the composition and governance of the Sports Administration Review Board (SARB), including the process by which members are appointed, the criteria for their selection, and the extent to which the Board operates as an independent and impartial decision-making body.

The Sports Administration Review Board (SARB) functions as the former BPS Eligibility Review Board (ERB). The name change reflects the title of the Sports Administration Department.

Sports Administration Review Board Membership

Board membership is selected by the BPS Executive Director of Sports Administration. Members of the board can interchange while maintaining the membership expectation as stated below. The school leaders on the board have experience with athletics rules and regulations or have served on MIAA committees in the past.

Board members will consist of the following BPS staff:

- Chief of Student Support
- Executive Director of Sports Administration (facilitator)
- Senior Athletic Director
- Minimum of three Heads of School
- One district-wide staff member

b. Provide a detailed explanation of how SARB investigations are conducted, including any written policies or procedures governing the process and the individual(s) responsible for leading investigations. Describe the SARB review process, including:

i. Investigation timeline;

- The SARB reviews investigations presented to them by BPS Athletics and/or heads of schools. Investigations timelines are not standardized. Boston Public Schools is an open enrollment district with multiple MIAA member schools. Smaller cities and towns may receive one or two student transfers per season while BPS could review fifteen to twenty, which necessitates more flexibility. Investigations are based on the nature of the rules/regulations that are being investigated and the number of interviews or evidence that needs to be collected. For investigations involving eligibility, the SARB aims to submit their review by the MIAA Appeals Deadline for the Fall, Winter, and Spring seasons.

ii. Whether students are interviewed as part of eligibility determinations;

- Investigations primarily involve the schools, coaches, and athletic personnel. Students may be interviewed as part of an investigation when appropriate and necessary. When individual cases are reviewed, not all lead to an investigation.
- iii. Describe the student interview process;
- Students are consulted only if more information is needed. A parent/ guardian will be present in this case and translation will be provided as needed.
- iv. Whether SARB produces written factual findings; and
- v. Whether such findings are maintained as public records and made accessible to the City Council upon request.
- SARB does maintain written documentation regarding its determinations. These records outline the basis for eligibility decisions, ensuring that the process is consistent, documented, and adheres to established athletic and district policies. While the SARB maintains these records for administrative and compliance purposes, they are **not** public records available for general disclosure. This is because they are classified as Student Records. The findings may contain highly sensitive, personally identifiable information (PII) related to individual students, including details regarding IEP's, housing status, and financial or personal hardships.
- c. Clarify whether allegations of athletic recruitment are treated as a presumptive basis for disqualification, and describe the formal review process, if any, conducted prior to a determination of ineligibility.
- Yes, allegations of recruitment are treated as presumptive, meaning the burden of proof lies with the sending school.
- i. If a student is deemed ineligible based on allegations of recruitment, how Does SARB conduct its investigation? Who leads the investigation, and Which parties are interviewed? Are students and parents formally notified of the investigation, and if so, how? Do students have a meaningful opportunity to respond to or contest the allegations before a final determination is made?
- Investigations are handled by Athletics Department personnel and/or Central Office personnel. If the case is referred to the MIAA, BPS Athletics will work with the MIAA and the schools on gathering any information. Generally, the course of investigations and any interviews are determined based on the claims alleged. Students are part of the investigation when necessary. If a student is not involved in the investigation, school-based personnel will inform the student/family of any outcomes.
- d. Describe the appeals process following a determination of ineligibility, including applicable timelines and opportunities for students and families to be heard.
- Seasonal Deadline for MIAA Appeals
 - Fall Sports- September 22
 - Winter Sports- December 15
 - Spring Sports- April 1
 - Internally we collaborate with schools to review all eligibility appeals before they are submitted to the MIAA. The internal SARB review allows all parties involved to understand the hardship necessitating the appeal and ensures that we are providing accurate information, that can be supported, to the MIAA

i. If a receiving school declines to appeal to the MIAA on behalf of a student, may a student independently initiate an appeal within BPS SARB?

- No. The MIAA member school, and school leader, must initiate and execute all MIAA appeals. This is dictated by MIAA rules.

e. Provide annual data, for the past ten years, on the number of student-athlete transfers resulting in either eligibility or ineligibility:

- We do not currently collect this data.

iii. For students deemed ineligible, reasons provided explaining the basis for that determination, and written factual findings produced to support the decision.

- Students are determined ineligible based on MIAA and BPS rules and regulations. Schools and students are informed when this is the case. The school leader is informed and it is their responsibility to inform the student and coaches. A written notification is only provided if there is an appeal. Not all reviews lead to an investigation.

f. Describe how BPS tracks and evaluates the reasons for student-athlete transfers, including those related to Individualized Education Plans (IEPs), and provide data from the past academic year.

- The Form 200 serves as the tracking tool for the MIAA
- IEPs are supported by a school based team and led/guided by a Central Office Department. Any transfers are documented by school based teams.

i. Indicate if the BPS Chief of Specialized Services is involved in reviewing student-athlete transfer cases related to a student's IEP.

- No, the Chief does not review all student transfers.

g. Describe any accountability mechanisms in place to ensure timely and complete responses from sending schools to Form 200 requests.

- The Form 200 is required before a student can participate. It is difficult to impose a hard deadline given the nature of self-reporting by the schools. BPS Athletics may not always have the ability to uncover eligibility issues without the school's support and cooperation. Some cases present themselves early, some are discovered closer to season deadlines. It is important that schools self-report because sanctions could be imposed for playing an ineligible player during MIAA sanctioned competitions. These sanctions could include suspensions and even forfeiting of games. The accountability mechanisms in place are:
 - The use of Aspen
 - Consent Forms
 - Student Transfer Data
 - Form 200
 - SARB Review

h. Outline the protocols in place to ensure language access and translation services for families participating in transfer or eligibility proceedings.

- Welcome Services process transfer requests. For more information, including how a parent/ guardian can request translation services please [see here](#).

i. How are families notified of transfer or eligibility proceedings?

- Families initiate transfer requests and Welcome Services processes them. The question of eligibility heavily relies on the self-reporting of the schools. Each school is responsible for verifying student-athlete eligibility and communicating eligibility to the students. Any results of the eligibility process will be communicated to the school, and the school would communicate to the student/family.
- i. Describe the evidentiary standard or burden of proof applied in determining student-athlete eligibility or ineligibility.
- There are many factors that determine eligibility. Please see MIAA Handbook Rules 52-62.
- j. Indicate how frequently BPS central leadership has intervened in transfer eligibility cases and under what circumstances.
- Data for prior years is not available. For SY25-26, 12 cases made it to SARB Review of which 2 cases were submitted to BPS Central Office for additional consultation or investigation.
- k. Describe any protocols addressing potential conflicts of interest, including whether staff are ever recused from cases under investigation.
- If there is a conflict of interest, it is generally reported using the **DISCLOSURE OF APPEARANCE OF CONFLICT OF INTEREST AS REQUIRED BY G. L. c. 268A, § 23(b)(3) Form.**
- l. Indicate whether BPS has considered or implemented an independent review mechanism for student-athlete transfer determinations.

- BPS follows MIAA rules and regulations

2. MIAA Form 200 Protocols

a. Describe the step-by-step process for initiating and completing a Form 200, including any required timelines for receiving and sending schools.

- MIAA Handbook, pg 52 (MIAA Resource)
 - Understanding the Form 200

b. Provide annual data, for the past ten years:

- i. The number of Form 200 submissions initiated;
- ii. The number approved; and
- iii. The number denied or not certified by a sending school.

We do not currently possess this data

c. Clarify the process for submitting and reviewing allegations of recruitment under Form 200, including:

- i. Who is responsible for submitting written proof;
 - A school that alleges there is a violation of a rule or regulation.
- ii. What documentation is considered sufficient;
 - Depending on the alleged violation, there are many different forms of documentation that can be sufficient. Typically it is anything that supports the claim.
- iii. The process, timeline, and decision-making authority used to evaluate such evidence; and
 - MIAA is notified.
 - MIAA would ask the school and/or BPS Athletics to report findings within a certain amount of time (dependent on when the claim was received).
 - MIAA would ask for any results from a school or school system's internal review board.

- Results are given to MIAA
- MIAA rules on the decision.
- Schools can appeal with the MIAA or internally with the SARB.

iv. How does Boston Public Schools respond to allegations of retaliation against a student for requesting a school transfer? What safeguards are in place to ensure that Form 200 is not used or influenced as a means of retaliation by school staff?

- BPS Athletics supports each school fairly and impartially. BPS athletics will assist schools through the Form 200 process as well as appeals process when determined necessary. BPS follows the MIAA guidance, and any allegations pertaining to retaliation will be investigated by a cross-functional BPS team. While BPS works at all times to ensure compliance with MIAA rules, to ensure that all students can participate fully and fairly in athletics, the district also encourages all students to find the school within BPS that best meets their needs and supports them in meeting their educational goals and aspirations.

d. Describe any formal mechanisms through which BPS may provide feedback to the MIAA regarding transfer policies, and whether BPS has proposed changes to Rule 57 or related provisions.

- BPS is in constant communication with the MIAA about rules and regulations, review processes, and investigations.

3. Specific Cases

a. Provide all publicly available documentation related to the Amir Mohamed student-athlete transfer case, with appropriate redactions as necessary

Records BPS created in connection with this particular matter pertain to the student's educational progress, making them protected student records under both federal and state law, such that BPS cannot share them without the family's written consent.