

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

BOSTON PARENT COALITION FOR
ACADEMIC EXCELLENCE CORP.,

Plaintiff,

V.

Civil Action No. 1:25-cv-12015-WGY

BOSTON SCHOOL COMMITTEE and
MARY SKIPPER, in her official capacity
as Superintendent of the Boston Public
Schools,

Defendants.

DECLARATION OF BOSTON EDUCATION JUSTICE ALLIANCE (“BEJA”)

I, Keondré McClay, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am more than 18 years of age and competent to testify, upon personal knowledge, to the facts set forth herein.
2. I am the Executive Director of the Boston Education Justice Alliance (“BEJA”).¹ I assumed this role in 2024, although I have been affiliated with BEJA in various capacities for thirteen years. I earned my undergraduate degree at the Hult International Business School in Cambridge, Massachusetts.

¹ BEJA is a project of and fiscally sponsored by RESIST, Inc.

3. I am an alum of the Boston Public Schools (“BPS”), having graduated from the Edward M. Kennedy Academy for Health Careers. As a high school student, I served as a student representative on the Boston School Committee (“Committee”) where I helped inform curriculum development. I was also a member of the Boston Student Advisory Council, which was created by the Committee to elevate student voices, engage them in policymaking, and build leadership.

4. I have extensive experience as a youth organizer and education reform advocate. I have traveled around the world to share practices in student engagement, culturally sustaining educational practices, and global community building. I am also the Founder and President of Liberation Reimagined, a nonprofit which aims to ignite a passion for civic engagement and advocacy among students, and to inspire the next generation of leaders.

I. BEJA’s Mission and Membership

5. Founded in 2013, BEJA’s mission is the pursuit of justice for BPS students, parents, and teachers through uplifting community voices to build a stronger and better BPS system. Originally constituted as the Boston Truth Coalition, BEJA formed as a response to persistent educational marginalization of students and communities of color. BEJA also sought to counteract the privatization of public schools.

6. BEJA advances its mission through youth mobilization, capacity building for parents and communities, policy advocacy, and strategic alliances with BPS and other partners. BEJA’s priority areas include advocating for multilingual learners, equity at the Exam Schools (Boston Latin School, Boston Latin Academy, and John D. O’Bryant School of Mathematics and Science), fairness in BPS’s funding allocation, and school facilities. BEJA is governed by a steering committee that comprises youth and parent groups which sets the coalition’s priorities. The

steering committee also chairs various taskforces, such as its Opportunity Achievement Gap Taskforce, a middle school advocacy group that advocates fairness in admissions policies.

7. BEJA is a coalition of over 25 active organizations, many of which advance educational equity and all of which advocate for communities of color and low-income families in Boston. BEJA's member organizations include youth empowerment programs, faith-based institutions, a teacher's union, groups serving immigrant and refugee families, and service providers for LGBTQ+ youth, children involved in the criminal legal system, and families experiencing housing insecurity. BEJA's members include groups representing Boston's Black, Latinx, and Asian communities.

8. All of BEJA's coalition members are committed to public schools that offer rich and varied curricula, are welcoming and respectful, and advance equity. BEJA's newsletter through which it disseminates information about its work reaches an audience of over two thousand people.

9. Organizations become members of BEJA through an application and vetting process.

10. BEJA's constituent members include, for example, St. Stephen's Youth Programs, a youth-centered organization that promotes educational equity and organizes Latinx, Black, immigrant, and low-income communities. St. Stephen's Youth Programs also provides academic enrichment and support to students, nurtures their emotional and physical wellbeing, and offers teen employment and engagement programs. Annually, St. Stephen's Youth Programs serves hundreds of students ages 5 to 25 in Boston communities including Mattapan, Dorchester, Mission Hill, Roxbury, and the South End. Many of the middle school students served by St. Stephen's Youth Programs are eligible to attend the Exam Schools.

11. Daneila R.'s son is one such student. A member of St. Stephen's Youth Programs, Daniela's son is an eighth grader at Match Charter Public School in Boston. Daniela's eighth

grader plans to apply to the Boston Exam Schools. He is getting good grades in school and wants to attend a well-resourced high school so that he will be better prepared for college. Daniela wants her son and her other children to have better educational opportunities than what was available to her. Daniela's son's pathway to the Exam Schools could be adversely impacted by the challenge to the current admissions criteria.

II. BEJA's Exam Schools Advocacy

12. BEJA has long advocated for educational equity at the Exam Schools. In July 2020, for example, BEJA joined allied groups to demand that the Committee suspend the administration of the Independent School Entrance Exam, the entrance exam for the Exam Schools, because of the COVID-19 pandemic. BEJA and its allies noted that the pandemic disproportionately impacted low-income students from communities of color, many of whom come from households where paying for tutoring and test preparation classes was not an option. BEJA also remarked that the admissions process to the Exam Schools has historically produced racially unjust outcomes.

13. In March 2021, when the Committee announced changes in admissions criteria to the Exam Schools, BEJA and its allies applauded the changes which, though imperfect, afforded greater educational opportunity to low-income and previously acutely under-identified students from the many Boston neighborhoods served by BEJA's constituent members. In a published open letter, we welcomed the new admissions criteria because it valued "high academic standards, increased neighborhood equity, socio-economic inclusion and racial diversity."² We also recognized that the new criteria could redress persistent and chronic underrepresentation of Black and Latinx students

² *Statement Supporting the New Exam School Admissions Policy, Signed by 25 Organizations and 24 Individuals with a Personal Intro from Go Sasaki*, Bos. Parents Schoolyard News (Mar. 23, 2021), <https://schoolyardnews.com/statement-supporting-the-new-exam-school-admissions-policy-signed-by-25-organizations-and-24-bca3a34289ed>.

in the Exam Schools caused by admissions processes that fail to fairly identify qualified students from all backgrounds. We rejected the proposition that public education is a zero-sum game.

14. In June 2021, a BEJA member testified before the Committee in favor of eliminating an entrance exam.³ And in July 2021, BEJA and other groups urged the Committee to adopt the Exam Schools Admissions Task Force recommendation that students be grouped by tiers so that they compete against peers roughly in comparable socioeconomic circumstances, as this system would diminish the outsized advantage that inures to students from affluent families who can afford tutoring and test preparation classes.

15. Between 2022 and 2024, BEJA and its coalition members mobilized scores of students, parents, and community members to speak at Committee meetings about changes proposed to the Exam Schools. For example, in 2023, BEJA was instrumental in pushing back on a proposal to relocate the John D. O'Bryant School of Math and Science—one of the Exam Schools—from its current location in Roxbury to West Roxbury. As part of this advocacy, a BEJA representative testified at a Boston City Council hearing on December 5, 2023. BEJA also mobilized community members in a media campaign. In an October 2023 Bay State Banner article, for example, BEJA communicated that it was unfair to move the most racially diverse Exam School to a neighborhood that is inaccessible by public transportation. The campaign mounted by BEJA and its allies led the Committee to back down.⁴

16. Most recently, on October 20, 2025, BEJA issued a press release to dissuade the Committee from proposed policy changes that will allocate 20% of seats at the Exam Schools to the highest

³ See Bos. Pub. Schs., Official Minutes of the Exam School Admissions Task Force Listening Session (June 23, 2021), <https://ma01906464.schoolwires.net/cms/lib/MA01906464/Centricity/Domain/2931/Minutes%206%2023%2021%20BSC%20and%20Exam%20School%20Admission%20TF%20Listening%20Session.pdf>.

⁴ See Max Larkin, *After Community Outcry, Boston Drops Plans to Move the O'Bryant School to West Roxbury*, WBUR (Feb. 27, 2024), <https://www.wbur.org/news/2024/02/27/obryant-exam-school-move-west-roxbury-abandoned>.

scorers citywide, regardless of socioeconomic tier, and will eliminate points awarded to students attending socioeconomically disadvantaged schools, and will reduce points awarded to students who live in public housing or are in the care and protection system (DCF custody).⁵

17. At the Committee's November 5, 2025, public hearing on the proposed changes, BEJA illuminated its reasons for rejecting the proposal. First, it had previously denounced the requirement of an entrance exam as unjust, discriminatory, and exclusionary because it poses a barrier for low-income students whose parents cannot afford to pay for test preparation and tutoring. Second, data analyzed for BEJA and its allies demonstrated that elimination of points for students attending socioeconomically disadvantaged schools, and the reduction of points for students in public housing and in DCF custody would result in significantly fewer invitations to multilingual learners, economically disadvantaged students, and students with disabilities, and would also undermine racial diversity. Consequently, BEJA strongly urged the Committee to not reverse course.

18. Despite the objections from BEJA and many other organizations and individuals, the Committee voted to adopt the proposed plan. And despite this setback, BEJA will continue to advocate for fairer and more equitable admissions criteria to the Exam Schools.

III. BEJA's Educational Equity Advocacy

19. In addition to promoting fairness in admission processes to the Exam Schools, BEJA also advocates for multilingual learners. For example, in May 2024, BEJA and its constituent member, St. Stephen's Youth Programs, organized a town hall to denounce BPS policy to immerse multilingual learners in English-only classes. More recently, at a community event in May 2025,

⁵ Press release on file with BEJA.

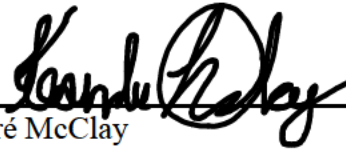
BEJA and St. Stephen's Youth Programs again educated parents and students about their right to language access.

20. Additionally, BEJA organizes parents to participate in their schools' budgeting process. For example, BEJA is running a campaign created by parents of students at BPS' Blackstone Elementary School to halt chronic underfunding of their schools.

21. BEJA is committed to expanding educational opportunity for all students irrespective of the language their parents speak, the zip codes or neighborhoods in which they live, the paucity of resources at the schools they attend, or their race, ethnicity, or socioeconomic background.

22. This lawsuit is important to BEJA. Plaintiff's challenge to the Exam Schools admissions criteria threatens to undo policy reforms, such as having students from similar socioeconomic circumstances compete against one another for spots, for which BEJA and its allies fought. If the lawsuit is not defeated, BEJA will be forced to continue to fight against an entrance exam policy that demonstrably limits educational opportunity for Black students, Latinx students, multilingual learners, low-income students, and students with disabilities. That should not stand.

Signed under the penalty of perjury this 24 day of November, 2025



Keondré McClay