



Problem Resolution System Office
State Complaint Decision

Re: Intake PRS 14092
Letter of Closure - Compliance Found

Introduction

On August 5, 2025, Owen Zaret (the “Complainant”) filed a state complaint (“Complaint”) with the Problem Resolution System Office (“PRS”) of the Massachusetts Department of Elementary and Secondary Education (the “Department”) involving the Easthampton Public Schools (the “District”).

Investigation Summary

In response to PRS 14092, the Department’s investigation in this matter included the following steps:

- reviewed the Complaint
- provided the Complainant with the opportunity to submit additional information about the allegations
- requested a Local Response (“LR”) from the District
- reviewed the LR and all information submitted by the District
- reviewed all information provided by the Complainant
- reviewed relevant state and federal education laws, regulations, and guidance

Summary of Allegations

PRS has the authority to investigate alleged non-compliance that occurred within one year prior to the date the complaint was received by the Department, in this case, August 5, 2025. The Department investigated:

1. Whether the District took prompt and effective steps to respond to alleged harassment of students based on national origin and shared ancestry (Jewish identity) in a manner consistent with the requirements of Title VI and state law during the 2024-2025 school year when the District received notice of conduct occurring or having occurred in the District’s schools, including but not limited to finding drawings of swastikas in a school bathroom and on a poster hanging in a school, finding other antisemitic graffiti, and accusations against an 18-year-old student made by other students regarding “genocide, colonialism, and apartheid” and targeting of said student for wearing a shirt with Hebrew lettering on it, which created a hostile environment based on national origin and shared ancestry (Jewish identity).

Findings of Fact

After an independent and complete investigation of all information, PRS makes the following findings of fact:

1. In the Complainant's statement of concern submitted with the PRS complaint, the Complainant alleged that "the school district fostered a harmful and hostile environment towards Jewish residents and students through refusal to evaluate resources to address growing threats of antisemitism in schools". The Complainant also reported that the District "minimized, dismissed, or concealed" incidents of antisemitism, which included, but were not limited to, those incidents described in the allegation.
2. The District identified two of the incidents reported by the Complainant, which may have created or contributed to a hostile environment based on shared Jewish identity, but which were outside of the Department's lookback period (targeting of a high school student for wearing clothing with Hebrew lettering on it and accusing the student of genocide, colonialism and apartheid and targeting of a middle school student who was then homeschooled). The District also identified two other reported incidents during the investigation period that may have created or contributed to a hostile environment based on shared Jewish identity, for which the District took steps to address any hostile environment. These incidents occurred on December 10, 2024 and December 15, 2024.
3. On December 10, 2024, a swastika was discovered scratched into a desk and this incident was reported to the assistant principal (the "AP"). On December 11, 2025, the AP commenced a Title VI/Civil Rights and disciplinary investigation beginning on December 11, 2025. According to the LR, the investigation concluded on January 6, 2025 and was "inconclusive" as the responsible party could not be identified.
4. On December 15, 2024, an incident was reported at the high school (the "High School") in which a message was written on the notebook of a student that stated, "I hate Jews" and "N_____". The AP investigated and found that the notebook, which belonged to a male student who was not Jewish and was white, was located on the top of a stack of notebooks on an open shelf in the classroom. The investigation concluded on January 6, 2025, as the AP could not identify the person who engaged in the reported behavior and could not determine the student whose notebook contained the graffiti was specifically targeted, although the District posited "it did not appear so".
5. On December 19, 2024, the High School principal (the "Principal") sent an email to the school community and reported that the High School had recently discovered "incidents of hate-based graffiti" and that an investigation was being conducted. The Principal included a guidance document developed by the Department entitled "Combatting Hate in Our Schools: A Guide for Families and

Students” and asked families to review the document so that they could become familiar with the tools and strategies to use if they were confronted with hate speech, bullying, or harassment.

6. On January 5, 2025, the Principal sent an email to staff at the High School with the District’s response to incidents of hate-based graffiti found at the High School. The Principal’s email discussed that the results of the investigation were inconclusive, but encouraged staff to share any additional information available. The email also included a plan for a short-term and long-term approach to addressing hate speech in the District that focused on providing students with communication tools to “appropriately respond should they encounter hate-speech or any kind in the school community” and developing culturally-responsive instructional practices as part of the School Improvement Plan. The Principal also provided the staff with language to read to students during Periods 1 and 4 on January 6 about the investigation, its outcome, and the tools as part of the short-term approach.
7. On January 6, 2025, the Superintendent reported the graffiti incidents to the local police department. In this report, the officer indicated that the police department had received a call from the superintendent (the “Superintendent”) who reported an incident where staff at the high school had found “some suspicious hate speech” in “mid-December”. The Superintendent also stated that this was an “isolated incident” that was being investigated by school administrators. The police officer met with the Principal and the AP, who provided the following information regarding the two reported incidents:
 - On December 5, 2024, a teacher sent an email to school administrators that there was “a faint scratch of an image on a tall standing desk in the room”.
 - On December 15, 2024, a teacher sent an email to school administrators and reported that there was “graffiti found on a student’s notebook that needed to be reported”.

The police report documented that in response to each of these concerns, school administrators conducted investigations, including interviewing staff and students, and discussed the reports with the Superintendent and the District’s Diversity Coordinator. The police officer’s report concluded that “at this time, there are no suspects, and the hate speech has been removed”.

8. On January 7, 2025, the Principal sent an email to the school community to inform community members of “instances of hate-based graffiti” found in the school. The Principal further noted that investigations conducted by the District regarding these incidents were “inconclusive” and encouraged anyone with additional information to come forward. The Principal’s email included information about the District’s short-term and long-term approaches that was consistent with the information shared in the January 5, 2025 email to the High School staff.

According to the LR, posters with the ways that students could respond to incidents of hate speech were placed around the school and projected on the large screen TV in the cafe commons/lobby area.

9. The District described several initiatives the District has taken to implement “programming designed to promote cultural awareness, anti-bias learning, and restorative approaches when incidents occur.” In March 2025, the District convened staff members, parents/caregivers, and students to develop an anti-bias curriculum that promotes “Dialogue Forums” for discussions where participants can learn to engage in conversation and listen to points of view that may be different from their own. The District was also awarded the Massachusetts Hate Crimes Prevention Grant from the Department of Elementary and Secondary Education, which the District planned to use for “introduce[ing] new student-led anti-bias clubs at the middle and high school, to bring in expert trainers for additional staff workshops on hate crime prevention, and to improve our incident reporting systems so that students can report concerns anonymously and without fear.” The District also applied for a Genocide Education Grant from the Massachusetts Genocide Education Trust Fund in the spring of 2025. With the awarded funds, the District planned to develop new curriculum on genocide and to seek out partnerships with community resources, including the Western Massachusetts Holocaust & Genocide Education Center, for support on curriculum development and professional development for history and social studies teachers.

Conclusions

Based on the Findings of Fact outlined above, PRS has reached the following determinations:

Conclusion to Allegation No. 1:

The Complainant has shared his belief that the District violated Title VI of the Civil Rights Act of 1964 (“Title VI”) and state law by “minimizing, dismissing, or concealing” alleged antisemitism towards of students based on their shared Jewish identity when it had notice of several instances of conduct occurring within the school that, by failing to address those instances appropriately, created a hostile environment for Jewish students.

42 U.S.C. § 2000d states that “[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” On November 7, 2023, the U.S. Department of Education’s Office for Civil Rights issued a letter in response to the “nationwide rise in reports of hate crimes and harassment, including an alarming rise in disturbing antisemitic incidents and threats to Jewish, Israeli, Muslim, Arab, and Palestinian students on college campuses and in P-12 schools.” [11/7/23 Dear Colleague letter at 1](#). This letter reminds schools of their legal obligation under Title VI “to address prohibited discrimination against students and others on your campus—including those who are or are perceived

to be Jewish, Israeli, Muslim, Arab, or Palestinian—in the ways described in this letter.”
Id.

“Schools that receive federal financial assistance have a responsibility to address discrimination against Jewish, Muslim, Sikh, Hindu, Christian, and Buddhist students, or those of another religious group, when the discrimination involves racial, ethnic, or ancestral slurs or stereotypes; when the discrimination is based on a student’s skin color, physical features, or style of dress that reflects both ethnic and religious traditions; and when the discrimination is based on where a student came from or is perceived to have come from, including discrimination based on a student’s foreign accent; a student’s foreign name, including names commonly associated with particular shared ancestry or ethnic characteristics; or a student speaking a foreign language.” *Id.*

The Department also looks to the state law, which requires that “each school district shall establish policies and procedures...that ensure that all obstacles to equal access to school programs for all students regardless of religion [or] national origin.... are removed” (603 CMR 26.07(1)). These policies and procedures must include “procedure(s) for accepting, investigating and resolving complaints alleging discrimination or harassment” (603 CMR 26.08).

In this complaint, the allegations are that (1) the District had notice of several acts that constituted antisemitic harassment—drawings of swastikas and other antisemitic graffiti on school property, accusations made against an 18-year-old Jewish student by other students regarding “genocide, colonialism, and apartheid” and targeting of that same student for wearing a shirt with Hebrew lettering on it; and (2) the District’s response to these incidents did not address or prevent the continuation of a hostile environment for Jewish students in its schools. On their face, the Complainant’s allegations involve conduct that may constitute “racial, ethnic, or ancestral slurs or stereotypes”¹, and allegations that students were experiencing a hostile environment based on this conduct may be covered by Title VI.

“OCR interprets Title VI to mean that the following type of harassment creates a hostile environment: unwelcome conduct based on shared ancestry or ethnic characteristics that, based on the totality of circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person’s ability to participate in or benefit from the recipient’s education program or activity. Schools must take immediate

¹ See also [OCR Fact Sheet](#) (“Title VI prohibits discrimination based on race, color, or national origin against students of any religion, such as students who are Jewish, Christian, Muslim, Sikh, Hindu, or Buddhist, when the discrimination, for example, involves:

- racial, ethnic, or ancestral slurs or stereotypes;
- how a student looks, including skin color, physical features, or style of dress that reflects both ethnic and religious traditions; and
- a foreign accent; a foreign name, including names commonly associated with particular shared ancestry or ethnic characteristics; or speaking a foreign language.”)

and effective action to respond to harassment that creates a hostile environment.”
11/7/23 Dear Colleague letter.

In cases where a hostile environment does exist, and a school knew or should have known of that hostile environment, the Department considers whether the school met its obligation under Title VI to take prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effects, and prevent harassment from recurring. “In other words, a school violates Title VI when it fails to take adequate steps to address discriminatory harassment, such as antisemitic harassment.” [5/25/23 Dear Colleague letter](#).

As part of the LR, the District shared its policy titled “Non-Discrimination Policy Including Harassment and Retaliation.” The Non-Discrimination Policy prohibits discrimination, which includes harassment or retaliation, on a variety of bases, including ancestry, ethnic background, and national origin, in a location or under circumstances where the school has oversight over the location or participants. The Non-Discrimination Policy defines discrimination or harassment as unwelcome conduct, whether physical or verbal, that is based on any individual’s actual or perceived status in a protected category that has the intent or effect of creating a hostile education or working environment by limiting an individual’s ability to participate or benefit from the District’s programs or activities. Such activity may include displays of written materials or pictures that are degrading to a person or group belonging to a protected category or any speech or action that contributes to, promotes or results in a hostile or discriminatory environment to a member or a group belonging to a protected category.

The Non-Discrimination Policy explains how students and families can report prohibited conduct to the District and provides contact information for outside agencies that enforce anti-discrimination laws. According to the Non-Discrimination Policy’s implementation procedures, staff are required to report allegations of harassment to the principal or the civil rights coordinator, identified in the Policy and by the District as the Director of Special Education, and upon receipt of a report, these concerns will be investigated promptly.

PRS need not determine whether the alleged conduct in this case resulted in a “hostile environment” that would trigger the District’s obligations under Title VI, because the District did respond. In cases where a hostile environment exists, “[s]chools must take immediate and appropriate action to respond to harassment that creates a hostile environment.” [5/25/23 Dear Colleague letter](#). In response to the reported concerns received in December 2024 regarding images of swastikas engraved on school property, the Assistant Principal began investigations. When the investigations were concluded, the Principal, in coordination with school staff, shared information with students about the incidents and provided “short-term” information about how students could navigate responses to hate speech, including reporting their concerns to district staff. The high school administration also discussed the investigation reports with the Superintendent and the District’s Diversity Coordinator. The Principal sent two communications to the school community notifying them of the graffiti incidents, the

District's path of investigation and the planned long-term approach to addressing the presence of hate speech in the High School and other district schools.

The information submitted by both the Complainant and the District indicates that—irrespective of whether the incidents identified by the Complainant created a “hostile environment” within the meaning of Title VI—the District took prompt and appropriate actions to address the incidents that occurred during the period of investigation and for which the District had actual notice of their occurrence within the school setting. The administration received the report of the image of the swastika engraved in a desk on or about December 10, 2024. The Assistant Principal began that investigation on December 11, 2024. The administration received the second report of the written statements on December 15, 2024 and began an investigation on December 16, 2024. On December 19, 2024, the Principal sent the email to the school community notifying them of the reported incidents and the District's investigations. On January 5, 2025, the Principal directed the school staff to share the results of the investigations and the short-term and long-term steps that the District was taking to address hate speech. On January 7, 2025, the Principal emailed the school community with the investigation results and the District's approach moving forward. Each of the investigations was initiated the day after the report was made, and the investigations concluded approximately ten (10) school days after the reports were received.

The record also indicates that the District took additional steps to address Complainant's concerns, among them: meeting with the Complainant, notifying law enforcement of the reported conduct, developing anti-bias curriculum with the input of school staff, students, and parents/caregivers, applying for education grants to be used in the development of curriculum to address genocide, including studies of the Holocaust, and partnering with local community education centers on curriculum development. **Accordingly, PRS has not found that the District failed to comply with [Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d](#) or [603 CMR 26.07](#).**

Closing

PRS decisions are final and may not be appealed. If either party believes that any findings of fact that impact the outcome and conclusions contradict documentation provided during the course of this investigation, the party may consider the procedure outlined in this [guide](#).

As of February 3, 2026, this decision is final.

Recipients:

Owen Zaret, Complainant
Michelle Balch, Superintendent, Easthampton Public Schools