



Advocates for Children of New York

Protecting every child's right to learn since 1971

Testimony to be submitted to the New York City Council Committee on Education

Re: Intro No. 868 (District 75 Schools Reporting)

March 29, 2023

Advocates for Children of New York (AFC) appreciates the opportunity to submit testimony regarding Intro No. 868, which would require the Department of Education (DOE) to report on the number of students attending District 75 schools and the criteria used to determine the location of District 75 schools. For more than 50 years, AFC has worked to ensure a high-quality education for New York students who face barriers to academic success, focusing on students from low-income backgrounds. We advocate for students whose needs are often overlooked, including many students with disabilities in District 75, the Citywide district serving students with the most significant needs.

Intro No. 868 would fill a gap in existing public reporting by requiring the DOE to report on the number of students in District 75 programs *by building*, rather than by school name and location code/District Borough Number (DBN) alone. As District 75 schools typically have multiple physical sites, students enrolled at any given District 75 school are not necessarily all attending class in the same building—or even in the same geographic school district. Publicly reported enrollment data, however, aggregates site-level enrollment into a single school-level total.

While having school-level enrollment counts is certainly important, the lack of site-specific data significantly limits the ability of advocates, parents, and other stakeholders to assess and hold the DOE accountable for improving educational experiences and outcomes for students with disabilities in District 75 programs. For example, it is not possible to calculate total DOE enrollment within any set of administrative boundaries (e.g., by City Council district, by police precinct) with complete accuracy—something AFC routinely seeks to do for purposes of calculating rates—because all students placed in District 75 schools get assigned to their school's primary building, regardless of whether they attend school in that physical location. Building-specific enrollment data would support improved analysis of other publicly reported data, and thus an improved understanding of current needs, challenges, and bright spots.

To maximize the utility of the public reports produced pursuant to this legislation, we recommend modifying section (b)(1) of Intro No. 868 to clarify that the DOE must

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report the number of students in a District 75 program by building code *and* location code/DBN. We are concerned that the language in the current version of the bill could be interpreted as requiring reporting by building code alone, and some buildings may be home to more than one District 75 program (e.g., District 75 schools P168X and P721X both have programs at DeWitt Clinton High School, building X440). If multiple District 75 schools have sites on a particular campus, it will be important to be able to distinguish between them. In addition, ensuring that location code/DBN is included when reporting site-level enrollment will enable advocates and outside analysts to easily match this data with that from other sources (e.g., to calculate what percentage of a District 75 school's students are at each physical site). We therefore suggest modifying (b)(1) to read:

1. The number of students participating in a district 75 program in each building where a district 75 program is provided, disaggregated by school;

We also strongly encourage the Council to consider requiring disaggregation by student disability classification, race/ethnicity, gender, English Language Learner (ELL) status, eligibility for free/reduced-price lunch, housing status, and foster care status. Compared to both City students as a whole and students with disabilities in District 1–32 schools, students placed in District 75 are disproportionately Black, low-income, and learning English as a new language. Disaggregation of student demographics at the site level would allow for the comparison of the demographic makeup of students attending a given District 75 program to that of their peers at District 1–32 schools *in the same building*, as well as enable monitoring of systemic inequities in program siting, re-siting, and co-location.

Thank you for the opportunity to submit testimony. If you have any questions or would like additional information, please contact Senior Policy Analyst Sarah Part at spart@afcnyc.org.