



Advocates for Children of New York

Protecting every child's right to learn

May 5, 2026

Mayor's Office of Equity & Racial Justice
253 Broadway, 9th Floor
New York, NY 10007

Via email: racialequity@equityoffice.nyc.gov

Re: New York City Preliminary Racial Equity Plan

Board of Directors

Kimberley D. Harris, *President*
Jessica A. Davis, *Treasurer*
Eric F. Grossman, *President Emeritus*
Carmita Alonso
Matt Berke
Whitney Chatterjee
Matt Darnall
Brian Friedman
Jamie A. Levitt, *past president*
Maura K. Monaghan
Jon H. Oram
Jonathan D. Polkes
Victoria Reese
Ashish Shah
Misti Ushio
Veronica M. Wissel

Executive Director

Maria M. Odom

Chief Operating Officer

Melkis Alvarez-Baez

Deputy Director

Matthew Lenaghan

Advocates for Children of New York (AFC) appreciates the opportunity to submit comments regarding the 2026 New York City Preliminary Racial Equity Plan. For over 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 speak out for students whose needs are often overlooked, including students with disabilities, English Language Learners (ELLs), students from immigrant families, students who are homeless or in foster care, and youth involved in the juvenile or criminal legal system. Each year, we assist thousands of families who are struggling to navigate the largest school system in the nation and access the services and supports their children need to learn. As such, our comments on the Preliminary Racial Equity Plan focus primarily on the goals regarding NYC Public Schools (NYCPS).

AFC is deeply committed to tackling racial inequity in education. More than 85% of our direct service cases involve students of color, and at a policy level, we have spent decades highlighting racial disparities in educational opportunities, experiences, and outcomes and pushing for systemic change. We appreciate the City's efforts to develop a plan for tackling racial disparities and ensuring *all* young people in the five boroughs—and particularly those in historically marginalized communities—receive the high-quality education they deserve.

I. Introduction: Children, Youth, Older Adults, and Families

At AFC, we frequently hear from families who have hit roadblock after roadblock trying to get needed special education supports and services in place for their children. While we are deeply concerned about the racial inequities in the special education process and appreciate the attention to students with disabilities in the Preliminary Racial Equity Plan, we are concerned that the reference to “over-referral for special education” in the introductory discussion of inequities in education (page 33) is an over-simplification of the enormously complex relationship between race



and disability in the context of P–12 education and recommend changing the phrase to “disproportionately classified as needing special education services.” Black and Latine students are numerically over-represented among students with Individualized Education Programs (IEPs) relative to overall NYCPS enrollment, mirroring national trends, but this does not necessarily mean that they are inappropriately *over-referred*. In fact, some studies have concluded precisely the opposite: that students of color, and particularly Black students, are systemically *under-identified* for special education services; they are *less* likely than otherwise similar White peers to receive extra academic and/or behavioral support via an IEP.¹

Disability itself is socially constructed, meaning there is no “correct” rate at which students of any racial/ethnic background *should* be referred for evaluation, and the special education process is characterized by enormous subjectivity and individual discretion. Every day, educators make countless conscious and unconscious judgements about students’ behaviors, abilities, and learning needs and make decisions that are shaped by their specific school context. A large body of research shows that such contextual factors (e.g., the demographic makeup of the student body as a whole) influence patterns of referral and classification; for example, Black and Latine students are *less* likely to be identified as needing special education services when they attend schools with higher concentrations of same-race peers but are *over-represented*—especially in the classifications of intellectual and emotional disability—when they attend schools with fewer students of color.² There is also evidence that implicit bias affects how teachers and school psychologists perceive students’ academic performance and behavior.³ In our direct service work at AFC, we see how this plays out in both directions, resulting in both over- *and* under-referral. We have worked with students whose developmentally appropriate behaviors were pathologized based on racial and cultural stereotypes, and we have worked with students whose academic difficulties were brushed aside due to lower expectations for children of color, rather than met with intervention and support.

Moreover, schools and students do not exist in a vacuum. The inequities in health care, housing, economic opportunity, and beyond that are described elsewhere in the Preliminary Plan have a significant impact on development, beginning in utero, and shape the learning needs that children

¹ See, e.g., Jacob Hibel, George Farkas, & Paul L. Morgan, “Who is placed into special education?” *Sociology of Education* 83, no. 4 (October 2010), <https://doi.org/10.1177/0038040710383518>; Paul L. Morgan et al., “Replicated Evidence of Racial and Ethnic Disparities in Disability Identification in U.S. Schools,” *Educational Researcher* 46, no. 6 (August 2017), <https://doi.org/10.3102/0013189X17726282>; Paul L. Morgan et al., “Cross-Cohort Evidence of Disparities in Service Receipt for Speech or Language Impairments,” *Exceptional Children* 84, no. 1 (October 2017), <https://doi.org/10.1177/0014402917718341>.

² See, e.g., Todd E. Elder et al., “School Segregation and Racial Gaps in Special Education Identification,” *Journal of Labor Economics* 39, no. S1 (January 2021), <https://doi.org/10.1086/711421>; Rachel Elizabeth Fish, “Standing Out and Sorting In: Exploring the Role of Racial Composition in Racial Disparities in Special Education,” *American Educational Research Journal* 56, no. 6 (December 2019), <https://doi.org/10.3102/0002831219847966>; Leanna Stiefel et al., “The Role of School Context in Explaining Racial Disproportionality in Special Education,” *Educational Evaluation and Policy Analysis* 47, no. 4 (December 2025), <https://doi.org/10.3102/01623737241271413>.

³ See, e.g., Rachel Elizabeth Fish, “The racialized construction of exceptionality: Experimental evidence of race/ethnicity effects on teachers’ interventions,” *Social Science Research* 62 (February 2017), <https://doi.org/10.1016/j.ssresearch.2016.08.007>; Megan E. Golson et al., “Racial and Gender Bias in School Psychologists’ Special Education Classification Considerations,” *Remedial and Special Education* 47, no. 2 (April 2026), <https://doi.org/10.1177/07419325241297341>.



bring with them to school. For example, children in low-income communities of color are more likely to be exposed to lead and other environmental toxins linked with future learning and behavioral challenges, and they are disproportionately likely to experience the trauma of housing loss, parental incarceration, or exposure to police violence, increasing their risk for mental health challenges that impact their ability to learn. There are also well-documented racial disparities in timely access to Early Intervention (EI) services for infants and toddlers with developmental delays or disabilities; Black children, in particular, are *less likely* than otherwise similar White children to be referred to the EI program and to receive services once found eligible.⁴ These disparities in early diagnosis and access to services can result in children needing more intensive special education services later on—and so while Black and Latine students are over-represented in preschool and school-age special education classes (i.e., in less inclusive settings) relative to the overall population of students with IEPs, some portion of this over-representation is likely attributable to intensity of need.

The numerical over-representation of Black and Latine students in special education is thus in part a function of bias within the school system itself and in part a reflection of structural racism in society writ large. These two strands are intertwined, and addressing racial disproportionality in special education requires attending to the multitude of ways racism shapes children's lives both inside *and* outside the classroom. The role of the public schools is to meet children where they are and ensure they receive the services and support they need to learn and make academic progress.

Given such complexities, as well as our concern that language like “lower levels of academic readiness” perpetuates a deficit framework by minimizing the many assets that children of color bring with them to school, we recommend the following revisions to the first paragraph under “Inequities in Education” (page 33):

Children of color continue to face barriers to accessing quality early childhood education, disproportionate rates of inappropriate discipline, over-referral for are disproportionately impacted by exclusionary discipline and disproportionately classified as needing special education services, and lower levels of academic readiness are less likely to reach proficiency benchmarks on standardized tests or to graduate from high school, all of which have profound life-long effects on students of color, limiting their career options, earnings potential, and overall sense of well-being and happiness.

⁴ See, e.g., Emily Feinberg et al., “The impact of race on participation in Part C Early Intervention services,” *Journal of Developmental & Behavioral Pediatrics* 32, no. 4 (May 2011), <https://doi.org/10.1097/DBP.0b013e3182142fbd>; Matthew L. Romo et al., “Birth characteristics of children who used early intervention and special education services in New York City,” *Journal of Public Health* 42, no. 4 (December 2020), <https://doi.org/10.1093/pubmed/fdz179>; Matthew L. Romo et al., “Early intervention and special education in New York City: Patterns of service use and disparities affecting children of color,” *Child: Care, Health and Development* 49, no. 1 (January 2023), <https://doi.org/10.1111/cch.13024>.



II. New York City Public Schools

With respect to the overall organization of goals, outcomes, strategies, and indicators for NYC Public Schools, we urge MOERJ to revise the “Mission and Commitment” text at the beginning of NYCPS’ section of the Preliminary Plan (page 64) to explicitly state the agency’s overall vision for change and explain how the short-, medium-, and long-term goals in the Plan serve to bring about that change. To the extent that goals are interrelated and intended to build upon one another, these connections should be clearly articulated for the reader at the outset.

Special education

We appreciate the inclusion of goals focused specifically on students with disabilities and have long highlighted the over-representation of Black students, ELLs, and students from low-income families in segregated special education classes, including in District 75. However, we have deep reservations about goals and outcomes that are narrowly focused on reducing the number and percentage of Black boys placed in District 75 schools—particularly the outcome of reducing the number of Black boys placed in District 75 schools by 75 percent by 2028.

As currently written, short term-goal #3 (“Address the disproportionate placement of Black boys with disabilities in District 75 schools during the kindergarten Individualized Education Program (IEP) process”) and medium-term goal #2 (“Ensure that students with disabilities are able to attend school in their local communities by providing the necessary supports in their zoned district schools, with a particular focus on disparities that result in Black boys being almost 3 times more likely than Black girls to be placed in District 75 schools”) fail to account for the complexities laid out above and could potentially serve to *exacerbate* existing inequities and deny students services that they need and to which they are legally entitled. AFC has had cases in which NYCPS was quick to move a student with unaddressed behavioral needs to a District 75 school, even though the student had strong academic skills and the ability to perform on par with their peers without IEPs, and we have also worked with families who were concerned that their child needed a specialized setting and that the District 1–32 school recommended for their child was unable to provide the support they needed to learn. IEPs are, by definition, intended to be *individualized* for each student. And for some students with high support needs, a specialized school (i.e., District 75) is the setting they need to make meaningful progress and, therefore, the setting the City is required to provide under federal law.

We recommend merging short-term goal #3 and medium-term goal #2 into a single goal that reads as follows:

Ensure more students with disabilities can attend school in their local community by providing the necessary supports and services in those schools; expanding access to specialized programs, particularly in historically marginalized communities; and developing new instructional models in areas of unmet need, with a particular focus on classifications and service recommendations characterized by significant racial disproportionality.

While the strategies and indicators for each of the existing goals should be combined under this new goal, the metrics currently listed as outcomes for both short-term goal #3 (“Reduce the percentage of



Black boys with disabilities placed in District 75 schools as they enter kindergarten”) and medium-term goal #2 (“By 2028, achieve a 75 percent reduction in the number of Black boys bused to District 75 schools”) are far too narrow and lacking in nuance. We have no way of knowing what proportion of students will need the type of support available in District 75 come 2028 or 2034, both because the student population is continually changing and because the answer hinges on whether NYCPS takes steps to better serve students with disabilities in District 1–32 schools. These two outcomes are potentially valid *indicators* of progress, but they are *not* a desired outcome in and of themselves.

Inflexible targets (e.g., a 75 percent reduction in two years) can create perverse incentives and would take away the discretion of IEP teams to recommend the setting appropriate for an individual student. Based on our experience with past reforms, we anticipate that such a blanket directive would influence schools’ decision-making in an adverse manner, resulting in the creation of inappropriate IEPs that fail to meet students’ needs. In other words, the inclusion of an explicit numerical target with an aggressive timeline, such as the current outcome, would likely result in some number of Black boys for whom District 75 *is* appropriate and needed being denied such a placement, in violation of their legal rights.

The City’s objective should be to ensure all students, including Black and Latine students with disabilities, become strong readers, writers, and critical thinkers, have access to the general curriculum and to behavioral and mental health supports, and graduate high school able to pursue their post-secondary goals. To that end, the City must take proactive steps to improve the special education supports and services available in District 1–32 schools and ensure that students with IEPs can thrive in inclusive settings. Without appropriate training, resources, and support, many schools will not be able to meet the needs of students who might otherwise be recommended for District 75, and will likely turn to suspension, calls to EMS, and other strategies that cause further harm and too often result in students disengaging from school. As the nature and degree of racial disproportionality varies widely across disability classifications—for example, compared to all students with IEPs, students with a classification of emotional disability or intellectual disability are disproportionately Black, while students classified as having a speech impairment are disproportionately Hispanic/Latine⁵—such steps should explicitly target such areas of need. NYCPS should, for example:

- Ensure there are enough special education teachers, service providers, and paraprofessionals to fulfill all students’ IEP mandates by directly hiring staff to address chronic shortages in the system and increasing payment rates for outside providers (e.g., speech and occupational therapists), who are currently reimbursed at far below market rate. The need for additional bilingual teachers and service providers is particularly acute; for example, 17% of K–12 students who needed bilingual speech therapy did not have *a single session* of this service last year, more than quadruple the rate at which students recommended for monolingual speech therapy went unserved.⁶ Furthermore, as recently as March 2026, NYCPS testified that only 63% of

⁵ [NYCPS Annual Special Education Data Report](#) (SY 2024–25).

⁶ *Ibid.*



preschoolers with IEPs were receiving their full mandated related services and nearly a quarter (24%) were receiving *none* of their mandated services at all.⁷

- Replicate and expand the grade levels served by existing specialized programs—such as ASD NEST/Horizon and AIMS, which serve autistic children, and PATH, which serves students who need intensive behavioral support—and develop new inclusive programs in areas of unmet need, prioritizing historically marginalized communities.
- Create more short and long-term therapeutic school options and specialized programming for young people with behavioral or emotional challenges, including students with significant trauma histories, mental health challenges, or court involvement.
- Build a corps of specialized staff who can be deployed to schools as needed so more students with disabilities can learn in general education settings. Students should have access to specific clinical services (e.g., cognitive behavioral therapy), intensive reading intervention, and other effective individualized supports through the IEP process and should not be limited to the options that happen to be available at their schools.
- Ensure every school has a school-based mental health clinic or a partnership with a community-based mental health provider that can provide expedited referrals and support for students with mental health needs.
- Hire at least one behavioral specialist per district who can provide direct services to students, and provide training and coaching for existing school staff in culturally competent, evidence-based, trauma-informed approaches for addressing student behavior.
- Ensure that 2-K, 3-K, and Pre-K programs are equipped to serve children with disabilities, as children removed from general education or integrated early childhood classes and placed in segregated preschool special education classes are far more likely to be recommended for District 75 classes in kindergarten.
- Create a multidisciplinary review process for District 75 placements to ensure referrals are not primarily driven by unmet behavioral or mental health needs that could be addressed in a more inclusive setting.

School climate, social-emotional learning, and school discipline

All students deserve to feel safe, supported, and valued at school. Yet AFC often hears from families of students who were met with punishment (e.g., suspension or unnecessary involvement of law enforcement) rather than support when they were struggling—responses that disproportionately harm students of color, particularly Black boys. For example, last year Black students made up less than a quarter of overall enrollment but received 47% of all superintendent suspensions,⁸ and 44% of

⁷ NYCPS testimony at the New York City Council Budget and Oversight Hearings on the Preliminary Budget for Fiscal Year 2027, the Preliminary Capital Plan for Fiscal Years 2027–2030, and the Fiscal 2026 Preliminary Mayor's Management Report (March 23, 2026).

⁸ [NYCPS Annual Report on Student Discipline](#) (SY 2024–25).



all NYPD child in crisis interventions (in which a student in emotional distress was removed from class and transported to the hospital for psychological evaluation) involved Black students.⁹

While medium-term goal #1 (“Integrate a commitment to holistic child development, responsive caregiving, and supportive high-quality environments in all NYCPS’ education settings to support the social and emotional development of students and reduce inappropriate disciplinary measures that disproportionately impact students of color”) is itself strong, the outcome, strategies, and indicators listed in the Preliminary Plan are inadequate to achieve this objective. Most notably, there is *no* further mention of racial disparities in exclusionary discipline, apart from the inclusion of a strategy to “track incident reporting data and analyze trends related to allegations of discrimination, harsh discipline, truncated schedules, suspensions, and expulsions across racial groups.” While tracking and analyzing data is essential, NYCPS has been doing as much for more than a decade. In addition, with respect to training and coaching for teachers and school staff, the strategies for medium-term goal #1 are largely focused on early childhood settings. K–12 educators similarly need ongoing training on trauma, effective behavior supports, and alternatives to exclusionary discipline so they are prepared to build supportive learning environments for all students.

We recommend adding an additional outcome under medium-term goal #1 that explicitly focuses on eliminating persistent racial disparities in school discipline and policing and on ensuring schools consistently use other appropriate interventions before excluding students from the classroom. Strategies could include, for example:

- Continuing to scale whole-school restorative practices, which hold students accountable for their actions while keeping them in the classroom where they belong.
- Hiring behavioral specialists who can help teachers and school staff implement effective, individualized behavior supports for students and prevent crises before they occur.
- Increasing access to school-based mental health services.
- Expanding ongoing, whole-school professional development and coaching in models such as Collaborative Problem Solving (CPS) and healing-centered engagement to help equip staff to understand and respond to behavior, build students’ skills in emotional regulation and problem-solving, address trauma and systemic stressors affecting student behavior, and foster stronger, trust-based relationships between students and staff.
- Limiting the use of suspensions for behavior related to disability by adopting stricter thresholds for suspending students whose behavior is linked to identified or suspected disabilities; establishing clear documentation and oversight mechanisms to ensure supportive interventions are meaningfully attempted and adjusted prior to exclusion from the classroom; and requiring schools to demonstrate fidelity in implementing students’ Behavior Intervention Plans (BIPs) and IEP-mandated supports before pursuing suspensions.

⁹ [NYPD School Safety Act Data](#) (Quarters 3–4 of 2024 and Quarters 1–2 of 2025).



Academic instruction and college and career-readiness

We recommend eliminating use of the term “achievement gap” throughout NYCPS’ portion of the Racial Equity Plan (pages 67 and 69). This term is rooted in a deficit mindset and implicitly places blame on individual children rather than on structural inequities. Students of color are less likely than their White peers to score proficient on standardized tests and graduate high school not because *they* have failed to achieve, but because the system has failed them. Where alternative terminology to “achievement gap” is needed, we recommend “racial disparities in [target outcome],” where target outcome refers to the specific indicator (e.g., ELA proficiency) being discussed; an alternative approach is to reframe the sentence to instead emphasize *opportunity* gaps.

We strongly support the inclusion of a goal focused on literacy; teaching students how to read is one of the most fundamental jobs of our public schools, and AFC has long argued that access to evidence-based reading instruction and intervention is a racial justice issue. To strengthen and clarify such a goal, we suggest combining all literacy-related efforts under a single umbrella, rather than splitting relevant strategies and indicators between long-term goals #1 (“Close achievement gaps and racial disparities in literacy, numeracy, and social-emotional development to strengthen student outcomes and career pathways”) and #2 (“Prioritize literacy and reading instruction for elementary school students with a focus on addressing racial disparities in reading proficiency so that all students are confident readers”). This umbrella goal should span all grade levels and align with the goals already adopted by NYCPS: by fall 2027, NYC Reads will be fully implemented in middle schools across all districts; by 2028, all districts and schools will implement evidence-based literacy practices and comprehensive multi-tiered systems of support (MTSS); and by 2035, all NYCPS students will be thriving readers and writers.

We also recommend updating the strategies laid out under long-term goal #2, as the current language largely reflects work that has already been fully or partially accomplished. For example, NYCPS has “require[d] all districts to choose one of three pre-approved phonics-based curriculums for their K–5 schools” since fall 2024. While sustaining the progress that has been made thanks to NYC Reads is critical, a literacy-focused goal should be ambitious and put forward action steps for taking the work to the next level. For example, expanding access to one-on-one or small group reading intervention for students across all grade levels should be a top priority moving forward, as efforts to strengthen MTSS are still in their very early stages. At AFC, we continue to hear from low-income families of color whose children have been struggling with reading for years, who have been unable to get help within NYCPS, and for whom paying for private tutoring—as families with greater resources routinely do—is simply not an option. There is a tremendous gap in programming for middle and high school students, in particular; when AFC works with older students struggling with foundational literacy skills, we often have no choice but to sue for private school or private tutoring because there is nowhere in the public system that can provide such students with the intensive support they need to become proficient readers.

With respect to long-term goal #2’s indicators, in addition to ELA proficiency rates for students in grades 3–5, we suggest including proficiency rates for 6th–8th graders; the percentage of students scoring level 1 on the ELA exam; and data from the universal screeners, especially for the non-tested grades of K–2. Other key indicators could include the percentage of students scoring below the 20th



percentile on the universal screener who are programmed for reading intervention; the percentage of schools that have established a comprehensive infrastructure for MTSS (e.g., have designated time for providing literacy intervention and enrichment); and the number of teachers who have been trained in centrally-supported intervention programs.

Finally, the action plan for medium-term goal #3 (“Disrupt historical inequities in college and career success by ensuring that all students graduate with a pathway to a rewarding career and long-term economic security”) would be strengthened by the addition of strategies specifically targeted to students with disabilities, who are disproportionately Black and Latine. In our direct service work, we have worked with students who were unable to access the support they needed to fully participate in and benefit from career pathways programs and work-based learning opportunities. When expanding initiatives like FutureReadyNYC, the City must take steps to provide such tailored support and ensure equitable access for students with IEPs. We also suggest adding a strategy focused on improving transition planning in the IEP process so that every high schooler with a disability has a detailed plan to help prepare them for life after high school. For some students with disabilities, access to services that can help them build independent living skills (e.g., travel training) is critical for post-secondary success.

School integration, equity in admissions, and culturally responsive and sustaining education

AFC strongly supports building staff capacity to deliver culturally and linguistically responsive and sustaining education, and we appreciate the inclusion of short-term goal #2 (“Build a workforce that emphasizes culturally responsive and sustaining instruction and recognizes and addresses the role of implicit bias”). With respect to outcomes and strategies, we urge NYCPS to go further and make the recruitment and retention of a diverse workforce an explicit aim. A growing body of research has found that students of color—and especially Black students—benefit academically and are less likely to be suspended from school when they have the same racial/ethnic background as their teacher,¹⁰ yet while the majority of students in New York City are children of color, 53% of NYCPS teachers are White.¹¹ As mentioned above, in a City where more than one in six students is learning English as a new language and 44% of students speak a language other than English at home,¹² there is tremendous need for bilingual teachers, service providers, and other school staff.

We also recommend adding a section about school integration in line with the recommendations of the School Diversity Advisory Group (SDAG). One of New York City’s greatest strengths is its

¹⁰ See, e.g., Christopher Cleveland & Ethan Scherer, “The Effects of Teacher-Student Demographic Matching on Social-Emotional Learning,” *Educational Policy* (November 2025), <https://doi.org/10.1177/08959048251382132>; Seth Gershenson et al., “The Long-Run Impacts of Same-Race Teachers,” *American Economic Journal: Economic Policy* 14, no. 4 (November 2022), <https://doi.org/10.1257/pol.20190573>; Christopher Redding, “A Teacher Like Me: A Review of the Effect of Student-Teacher Racial/Ethnic Matching on Teacher Perceptions of Students and Student Academic and Behavioral Outcomes,” *Review of Educational Research* 89, no. 4 (August 2019), <https://doi.org/10.3102/0034654319853545>; Matthew Shirrell, Travis J. Bristol, & Tolani A. Britton, “The Effects of Student-Teacher Ethnoracial Matching on Exclusionary Discipline for Asian American, Black, and Latinx Students: Evidence From New York City,” *Educational Evaluation and Policy Analysis* 46, no. 3 (September 2024), <https://doi.org/10.3102/01623737231175461>.

¹¹ [Local Law 226 Report on Demographics of School Staff](#) (SY 2024–25).

¹² [ELL Demographics: At-a-Glance](#) (SY 2024–25).



diversity, yet the City is home to one of the most racially segregated public school systems in the nation.¹³ While housing segregation is a major contributing factor, NYCPS policies and practices exacerbate the problem, and the SDAG's 2019 reports include a number of steps the City can take as it works to address barriers to admissions for students from historically marginalized communities and build inclusive learning environments where all students can thrive.¹⁴ For example, the City should support districts in developing community-driven diversity and integration plans and move away from the use of exclusionary admissions criteria like attendance. In addition, the City should increase support to help families with application processes from 2-K through high school, as we continue to hear from families who struggle to navigate the NYCPS online application systems or do not feel they have meaningful choices.

III. Other City agencies

Finally, as MOERJ works to finalize the Racial Equity Plan, we urge you to draw attention to areas where interagency collaboration is sorely needed to bring about meaningful change. Structural racism significantly impacts children's opportunities to learn in ways that are beyond the purview of NYC Public Schools, and so other City agencies also have a critical role to play when it comes to addressing racial disparities in educational outcomes and experiences. Two key examples include:

The Department of Health and Mental Hygiene (DOHMH)

Given the importance of ensuring children with developmental delays or disabilities receive services as early in life as possible, when the brain is developing rapidly and such services can have the biggest impact, we urge you to add a goal focused on addressing the well-documented racial disparities in the City's EI program, which is run by DOHMH. Strategies could include, for example, recruiting evaluators and service providers and further increasing payment rates for those working with children in underserved neighborhoods; strengthening service coordinators' ability to support families through the EI process and address barriers to participation in the program; and partnering with communities to enhance outreach in neighborhoods with low rates of referral and evaluation. Addressing disparities in access to EI must be a key component of any plan aimed at reducing racial disproportionality in school-age special education. For example, a recent study found that infants and toddlers who received EI services in New York City performed better on the third-grade ELA and math exams than otherwise similar peers,¹⁵ but children whose delays or disabilities were not identified prior age three, or who were EI-eligible but never received their mandated services, missed out on these long-term benefits.

¹³ Jessika Harkay, "[Report: Schools Across New York Are The Most Segregated in the U.S.](#)," *The 74* (March 17, 2026); Danielle Cohen Jarvie, [NYC School Segregation Report Card: Still Last, Action Needed Now](#) (UCLA Civil Rights Project / Proyecto Derechos Civiles, June 2021).

¹⁴ School Diversity Advisory Group, [Making the Grade: The Path to Real Integration and Equity for NYC Public School Students](#) (February 2019) and [Making the Grade II: New Programs for Better Schools](#) (August 2019).

¹⁵ Jeanette A. Stingone, Katharine H. McVeigh, & Lidiya Lednyak, "Early Intervention Developmental Programming and Childhood Academic Outcomes," *JAMA Network Open* 9, no. 2 (February 2026), <https://doi.org/10.1001/jamanetworkopen.2025.55890>.



The Department of Homeless Services (DHS), the Human Resources Administration (HRA), and the Department of Youth and Community Development (DYCD)

Last year, 63% of students in shelter—more than 90% of whom were Black or Hispanic/Latine—were chronically absent, meaning they missed at least one out of every ten school days. One in every five students in shelter transferred schools at least once during the 2024–25 school year, more than quadruple the rate at which permanently housed students changed schools mid-year.¹⁶ While NYCPS has taken important steps in recent years to bolster support for students in temporary housing (e.g., hiring school-based Bridging the Gap social workers and shelter-based Community Coordinators), there are systemic, structural issues that NYCPS cannot tackle on its own. Many school transfers and barriers to consistent attendance result from policies and practices in the City's shelter system that fail to consider the impact on children's education and well-being. For example, the City places more than 38% of families in a shelter in a different borough from their youngest child's school,¹⁷ resulting in long commutes, unnecessary school transfers, school absences, and barriers to participation in after-school activities. AFC has called on City Hall to lead a bold interagency effort to break down bureaucratic silos, tackle educational barriers facing students who are homeless, and ensure students can get to school every day and receive the educational support they need to succeed. Students in shelter will only have equitable access to education if City agencies—including NYCPS, DHS, HRA (which oversees domestic violence shelters), and DYCD (which oversees Runaway and Homeless Youth shelters)—work together to better align policies and coordinate efforts.

As you work to finalize the City's first Racial Equity Plan and operationalize the goals it sets forth, we urge you to partner with parents, students, educators, and advocates to ensure the Plan and its implementation are continually responsive to the needs and priorities of the communities most impacted. Thank you for the opportunity to comment and for considering our recommendations.

¹⁶ Advocates for Children of New York, [Educational Indicators for Students Experiencing Homelessness, 2024–25](#) (April 2026).

¹⁷ NYC Mayor's Office of Operations, [Preliminary Fiscal Year 2026 Mayor's Management Report – Department of Homeless Services](#), Goal 1(a).