



The Committee for Hispanic Children and Families, Inc.

75 Broad Street, 6th Floor, New York NY 10004 T: 212-206-1090 F: 212-206-8093 www.chcfinc.org

Policy and Advocacy Priorities and Recommendations 2019



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The Committee for Hispanic Children and Families (CHCF) has a thirty-six (36) year history of working with disenfranchised individuals and communities. We combine education, capacity-building and advocacy to strengthen the support system and continuum of learning for children and youth.

The constitution of the United States espouses a belief that all people are created equal. We at CHCF wholeheartedly believe that all children, youth and families are in fact equally created, but unfortunately, the systems established do not lend an equal opportunity for all to reach their full potential. The disproportionate treatment of people based on various status formulations require us, if we are truly committed to equality for all, to change systems, and create an equity formula that starts at birth, to offset hundreds of years of disproportionality.

To fill the gaps left by systems and institutions that have failed to provide adequate resources and opportunities for a large swath of the population, we will continue to provide services and supplemental assistances to those communities, families and youth that have been historically marginalized. We understand that our services and points of advocacy are short-term remedies to a long term, systemic epidemic.

What follows is our impact framework, focusing on creating equitable access to high-quality resources, education, and opportunities for all. We believe that each evidence-based policy priority area is a necessary step towards achieving true equality under the law.

Siempre,

Ramon Peguero, Esq.

President & CEO

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High-Quality Early Care and Education

Executive Summary:

The Committee for Hispanic Children and Families is a Child Care Resource and Referral (CCR&R) agency, offering technical supports and professional development trainings in Spanish to home-based family child care (FCC) providers, as well as assistance to families in accessing high-quality childcare from birth through school-age. Working with both families and providers allows us to understand the challenge of funding the true cost of high-quality care and the rising unaffordability for working parents considering an ever-growing cost of living in New York State. As of 2018, New York State has over 872,000 children under the age of 6 potentially in need of care, with their parent or parents in the workforce. New York State remains one of the least affordable states for working families in accessing regulated child care, in both center- and home-based settings. In 2016, only 20% of families eligible for a child care subsidy received a subsidy, which means that 80% (nearly a half million) are being denied access to subsidy.

Of additional concern are the consistently low child care market rates that are set by the state. The current rates do not reflect the true cost of providing high-quality care for providers, which ultimately gets covered at the provider's expense. Especially for providers who serve mostly or all children with subsidies, low rates mean that providers live on poverty wages, face issues with sustainability of their business which serves working families in these low-income communities, and experience challenges in delivering consistent high-quality care.

Having represented non-English speaking, home-based child care providers for over 30 years, CHCF has been witness to the consistent disregard for home-based FCC providers. New York State does not have the capacity to provide services through child care centers alone. In fact, most infants and toddlers attend programs that are home-based, and the majority of families receiving subsidy rely on home-based settings. Home-based programs are often the most affordable child care option and can offer more individualized care and greater flexibility in hours to meet the needs of working families. It is *essential* that we begin to meaningfully include home-based family child care in all conversations and planning of early care expansion. We must intentionally invest in the professional development, career ladders, and quality improvement of these providers. While some might believe that the "ideal" setting for child care and education is in centers, the reality is that many families will continue to rely on home-based settings. In pushing for a state-wide pay scale and quality rating and improvement system, we must ensure that these are scaffolded and responsive to the diverse levels of experience and education across the early child care sector, not ultimately cutting out a valuable and significant portion of providers that working families rely on.

Access

Cost:

Child Care Aware reports that as of 2018 there are 872,101 children under the age of 6 potentially needing child care in New York State, having either a single parent or both parents in the labor force.¹ The early child care sector is the backbone of the state and city's economic engine by allowing parents to participate in the workforce. The Committee for Hispanic Children and Families, working with both child care providers and families in need of child care, understands the conundrum in funding the true cost to provide high-quality child care and early education, which fairly compensates early childhood educators, and the rising unaffordability for working parents. New York State remains one of the least affordable states for child care. A 2017 report ranked New York in the top 10 least affordable states for center-based and home-based family child care for infants, toddlers, and 4-year-olds (see chart below).²

| New York State | Average Cost of Care NYS | Median Income Single Parent | Percentage of Income for Child Care | Median Income Married Couple | Percentage of Income for Child Care |
|-------------------|--------------------------|-----------------------------|-------------------------------------|------------------------------|-------------------------------------|
| Infant Care | | | | | |
| Center-based | \$15,028 | \$26,347 | 57% | \$95,817 | 15.7% |
| Family Child Care | \$10,972 | | 41.6% | | 11.5% |
| Toddler Care | | | | | |
| Center-based | \$13,312 | \$26,347 | 49.7% | \$95,817 | 13.7% |
| Family Child Care | \$10,244 | | 38.9% | | 10.7% |
| 4-Year Old | | | | | |
| Center-based | \$12,064 | \$26,347 | 45.8% | \$95,817 | 12.6% |
| Family Child Care | \$10,140 | | 38.5% | | 10.6% |

Based on the above average costs, it would cost a single parent with an infant and a toddler, making the median income, 107.6% of their income to place their children in center-based childcare; if that parent were at 100% poverty (\$20,780 for a family of three³) that would go up to 136.4% of their income. For a two-parent family with an infant and a toddler living at the poverty line (\$25,100 for a family of four) the cost would be 112.9% of their income to place their child in center-based childcare. In other words, at the current average rates it would essentially be impossible for working parents to pay out of pocket for high-quality, regulated full-time child care without some form of financial support.

Given the tremendous cost of regulated center- or home-based child care, when you consider the other costs of living (housing, transportation, food, clothing, etc.), a consistent lack of sufficient state funding to support working families in accessing high-quality care is creating impossible circumstances for many working parents. New York families realistically spend much of their income on housing. 46% of New York households are renters; 53% of renters

¹ State of Child Care Facts in the State of New York (2018). Child Care Aware. <http://usa.childcareaware.org/advocacy-public-policy/resources/research/statefactsheets/>

² 2017 Report: Parents and the High Cost of Child Care (2017). Child Care Aware. http://usa.childcareaware.org/wp-content/uploads/2017/12/2017_CCA_High_Cost_Report_FINAL.pdf

³ Federal Poverty Guidelines 2018. <https://aspe.hhs.gov/poverty-guidelines>

experience rent burden (paying more than 30% of their income towards rent).⁴ As a result, we also recognize the need to continue increasing wages so that working families are able to comfortably sustain the cost of living in New York State.

Child Care Subsidies:

With the high cost of high-quality child care, subsidies become one source of support for working families. In fiscal year 2017-18, New York State allocated \$799 million from the Federal Child Care Development Block Grant funding for the state across local districts. Approximately 182,000 children in 112,000 families received child care subsidies. 64% of the children receiving subsidies were in New York City. 49% of children served across the state received low-income subsidies, 51% received temporary assistance.⁵

However, access for all families that are eligible continues to be a concern. A 2016 study of Disparate Access to Head Start and the Child Care Development Block Grant found that only around 20% of families that meet eligibility requirements in New York State receive subsidies for child care.⁶ This means that 80%, or nearly half a million families that are eligible for child care subsidies are being denied that support.

Additionally, the rates for child care subsidies fail to reflect the true cost of high-quality services, which threatens the financial stability of programs – especially for providers that are serving mostly or only children with subsidies. (See chart below for an example of rates as of 2016 in New York City; go to site in foot notes for other NYS counties).⁷

| | Licensed/Registered | | | Legally-Exempt | | |
|-----------------|---------------------|--------------------------|--------------------------|-----------------------------|----------|-------|
| | Center Based | | Group/Family Day Care | Home Based | | |
| | Day Care Center | School Age Child Care | | Family & In-Home Child Care | | |
| | | | | Standard | Enhanced | Group |
| Infant – FT | \$371 | NA | \$200 | \$130 | \$140 | NA |
| Toddler – FT | \$268 | NA | \$185 | \$120 | \$130 | NA |
| Pre-School – FT | \$242 | \$242 | \$175 | \$114 | \$123 | \$182 |
| School Age – FT | \$210 | \$210 | \$160 | \$104 | \$112 | \$158 |
| School Age - AS | \$140 | \$140 | \$140 | \$70 | \$75 | \$105 |

In a low-income community setting, center- and home-based providers are aware that the families they serve don't have much more to give for child care services, so they are often hesitant to ask for additional fees to supplement the subsidies. Ultimately the providers or programs take the financial hit of covering the gap of true cost of services, making it difficult to pay staff fair, livable wages, as well as maintain their program and business. Here we see both the damage of severely underpaying this vital workforce, which sustains our economy, and a concern over their ability to maintain a high-quality program with limited funding.

⁴ Comparative Housing Characteristics (2018). 2017 American Community Survey 1-Year Estimates. U.S. Census Bureau American Fact Finder.

⁵ Child Care Facts and Figures (2017). The Office of Children and Family Services. <https://ocfs.ny.gov/main/childcare/factsheet/2017-DCCS-Fact-Sheet.pdf>

⁶ Schmit, S. and Walker, C. (2016) Disparate Access - Head Start and CCDBG Data by Race and Ethnicity. Center for Law and Social Policy (CLASP). <https://www.clasp.org/sites/default/files/public/resources-and-publications/publication-1/Disparate-Access.pdf>

⁷ New York State Child Care Demographics (2017). Office of Children and Family Services. <https://ocfs.ny.gov/main/reports/2017-NY-Child-Care-Demographics-Report.pdf>

Access to High-Quality Care – Policy Priorities and Recommendations:

| | Coalition Alignment | State |
|------------------------------------|--|---|
| Cost | Empire State Campaign for Child Care (ESCCC) | Strengthen the child and dependent care tax credit to better reflect the true cost of care. Double the maximum creditable amount to \$6,000 for one child, and \$12,000 for two or more children so that a family could receive a maximum of \$2,310 (or \$4,620 for two or more children) at tax time. |
| Access to High-Quality Care | ESCCC | <p>Increase State funding to counties for child care subsidies and program operation to expand equitable access to quality child care to more working families.</p> <ul style="list-style-type: none"> • \$51 million would restore the child care subsidy program to 2016 levels, adjusting for four years of inflation. • \$20 million to improve quality and increase slots dedicated to serving infants and toddlers; <ul style="list-style-type: none"> ○ \$2.5 million to expand the Infant-Toddler Specialist Network; ○ \$2.5 million to train and recruit new providers to the field. • \$26 million to revise the copayment formula so that no family receiving a child care subsidy contributes more than 20% of its gross income exceeding the poverty level, while maintaining the number of families receiving subsidies. <p>Increase State funding for the Child Care Facilitated Enrollment Projects in order to expand access to subsidies available to working families at higher income eligibility levels.</p> <p>Ensure immigrant families have access to quality care. Implement comprehensive, culturally and linguistically responsive outreach and education to immigrant communities to ensure that immigrant families understand their rights with respect to public benefits and to mitigate barriers to accessing those benefits, including quality child care.</p> |
| Pre-K | Ready for Kindergarten, Ready for College Campaign (CCI, Schuyler Center, Citizens Action, AQE) | <p>As New York City and State expand access to Pre-K, there must be appropriate resources to support the needs of <u>each</u> child, specifically those with developmental delays and disabilities, multilingual learners, and children experiencing homelessness. New York State must invest in culturally responsive curriculum and practices, as well as intentional, strategic efforts to attract and invest in educators who reflect the children, families, and communities they serve.</p> <p>It is also urgent and essential for the State to recognize and support current professionals in the early childhood field and open additional, scaffolded pathways to career ladders and certification.</p> |
| | Hispanic Federation LEAD Coalition | <p>Invest \$3.8 million to meet the needs of Multilingual Learners</p> <ul style="list-style-type: none"> • Expand integrated classrooms and provide guidance and oversight in implementing and sustaining integrated classrooms • Fund professional development of bilingual educators so they have the skills and knowledge to better support MLLs |

Investing in the Early Care Educator Workforce

Including Family Child Care Providers in the Discussion:

Home-based child care providers play a vital role in the economic sustainability of families, especially low-income families. Of the roughly 20 percent of eligible New York children receiving a child care subsidy, 64 percent rely on child care that is **not center-based**.⁸ Home-based family child care (FCC) providers can give more individualized care to meet the needs of working families, often are the most affordable child care option, and offer greater flexibility in hours available for care.⁹ As the state and city turn their attention to the need for expanding access to universal pre-K and early childhood education, it is important that we be mindful of including *all parts* of the sector. These are local businesses that ensure the stability of the workforce. We must work to protect and invest in these providers as a means of delivering high-quality child care and early education to such a significant portion of the 0-5 population.

As of 2018, there were 872,101 children potentially needing care in New York State, with their parent or both parents in the workforce.¹⁰ In 2017, New York State had 2,060 regulated day care centers with the capacity to serve 168,718 children. Only 2.8% of those centers offered non-traditional hours of care.¹¹ Center-based care simply does not have the capacity to care for all of New York's children in need of care. The system will continue to depend on home-based providers to ensure children receive high-quality care while parents are at work. Given that most infants and toddlers in care are in home-based settings and will likely continue to be, it is vital that this part of the sector be brought to the forefront of conversations around ensuring high-quality early care and education in a meaningful and intentional way.

Pay Parity:

Early care educators are overwhelmingly women (95%) of color (25% Hispanic, 23% Black, and 6% Asian). 40% of the child care workforce are immigrants. 64% speak English, with the remaining 36% speaking a multitude of languages, Spanish being the second most dominant at 23%. These child care providers rely on child care for their livelihood, while simultaneously caring for and educating society's most valuable and vulnerable population: our children. Yet, the average income for a child care provider in New York State is \$27,000.¹² This is only about \$2,000 more than the federal poverty rate for a family of four.

Two reasons why this rate is driven so low are (1) the subsidy rate, which is the base of income for many home-based providers. The rate does not reflect the true cost of care, including a fair wage for providing high-quality early childhood education. Additionally, (2) community-based organizations with center-based programs are not able to compete with the wages that are negotiated for early care and pre-k teachers in school districts – with subsidy rates

⁸Child Care Facts and Figures 2017. Office of Children and Family Services. <https://ocfs.ny.gov/main/childcare/factsheet/2017-DCCS-Fact-Sheet.pdf>

⁹ NYC Council Committee on Education Hearing: Testimony Submitted by The Committee for Hispanic Children and Families, Inc. (2018).

¹⁰ State of Child Care Facts in the State of New York (2018). Child Care Aware. <http://usa.childcareaware.org/advocacy-public-policy/resources/research/statefactsheets/>

¹¹ New York State Child Care Demographics (2017). Office of Children and Family Services. <https://ocfs.ny.gov/main/reports/2017-NY-Child-Care-Demographics-Report.pdf>

¹² Park, M., McHugh, M., Zong, J. and Batalova, J. (2015) Immigrant and Refugee Workers in the Early Childhood Field: Taking a Closer Look. The Migration Policy Institute. <https://www.migrationpolicy.org/research/immigrant-and-refugee-workers-early-childhood-field-taking-closer-look>

so low and not having sufficient outside funding and contracts to supplement the cost of competitive wages. A collateral impact of being unable to compete with union-negotiated wages in districts is high teacher turnover rates for CBO-led programs, which impacts the ability to provide consistent high-quality care.

Professional Development and Career Ladders:

We must find ways to support this sector in its **entirety**. Ensuring that every child has access to high-quality early care should not emphasize scaling out only center-based models, with partial glances towards the home-based family child care sector, when most families rely on home-based infant and toddler care. Not only are we underfunding the accessible care that working families rely on, leaders are positioning the system to severely cut the income source for local businesswomen (home-based providers) as center-based models are prioritized. There are also insufficient career ladder or degree advancement opportunities for a significant portion of this workforce, which would allow home-based providers to advance in the systems that are ultimately propagated.

Investing in the professional development and licensure training of early care providers means that it should be accessible to **all** early childhood educators, including providers and assistant providers, and must be culturally and linguistically responsive. Ensuring that children are in high quality home-based environments means that the space is safe *and* that every level of provider is trained and given opportunities to advance in their professional development. Most (if not all) of the structures for professional development are directed at the providers and not made available to assistant providers. The expectation is that the provider will carry the information back to their program and teach their assistants the content. Existing professional development is generally not a train the trainer model in that the providers aren't given the tools to carry the information (which is often quite extensive) back to the assistant providers and thoroughly and effectively cover the materials. Often there is not available time during program to convey the information in a meaningful way. As a result, the assistant teachers are being significantly underinvested in and it can impact the overall quality of the program itself. Assistant providers are often the ones with the most consistent direct contact with the children, as the provider is also handling general operations. If we are to continue with the current model of passing the information through the provider, we must invest in a system that holistically supports and develops the sector in its entirety through a true train the trainer model.

Additionally, the current trainings and supporting materials that ensure providers are in compliance and delivering a high-quality program are not consistently made available to providers speaking a language other than English. The ultimate result is an underinvestment in providers who don't speak English and a systemic method of holding certain providers out of the professional development and career ladder – namely immigrant women of color.

Investing in the Early Care Educator Workforce – Policy Priorities and Recommendations:

| | Coalition Alignment | City | State |
|---|---------------------|--|---|
| Including Family Child Care in the Discussion | CHCF | Continue to work with the DOE Department of Early Childhood Education as they plan for the EarlyLearn transition from ACS, specifically on the development of their FCC network support and eventual scale out to include all FCC providers throughout New York City. | |
| Pay Parity | ESCCC | | Increase State funding to stabilize the child care workforce and infrastructure by reinstating the 75th percentile formula for setting reimbursement rates and increasing funding to cover those costs. This would mitigate the immediate crisis caused by providers' increased operating costs while it is exploring different ways to determine reimbursement rates that more accurately reflect the true cost of providing quality care. |
| Professional Development and Career Ladders | CHCF | CHCF recommends that the state and city fund professional development trainings that are available to the assistant providers or accessible through a train the trainer model CHCF additionally recommends that OCFS and the DOE continue to expand culturally and linguistically responsive professional development and licensure trainings for providers overall | |

Supporting High-Quality Early Childhood Education

Child Care Resource and Referral (CCR&R) Consortium:

The changes proposed by the Child Care Development Block Grant (CCDBG) regulations and New York State's draft plan contain important and much-needed improvements, including increased consumer education and assistance with child care for more families, the establishment of new health and safety requirements for child care providers, and expanded requirements to improve the quality of child care. In order to achieve these important goals for our youngest children and their families it is critical that the collaboration between CCR&R's and the state increase. The CCDF State Plan provides the opportunity to build on the CCR&R network and its central role in developing a quality early childhood system. CCR&R networks are critical to the support of both parents in need of childcare in communities across the state (and nation), as well as to the support of capacity building for child care providers in these communities to ensure children enter school ready to learn. For more than ten years, state funding for CCR&R agencies remained flat while costs steadily rose. In New York State, for example, 2012 CCR&R funding was decreased by nearly \$850,000, even though the line item in the state budget remained unchanged at \$22.03 million.¹³

Quality Rating and Improvement System (QRIS):

There continues to be no consistent, recognized quality rating and improvement system throughout New York State. CUNY PDI was contracted through the Office of Children and Family Services to develop a QRIS system, which became Quality Stars, but OCFS still has not fully funded and contractually obligated agencies delivering early care services and supports to use Quality Stars. What traditionally happens in other states is the state agency will name one rating system that is used system-wide. New York State not doing so leaves Quality Stars as optional. Without one recognized system, a variety of systems continue to exist. Some agencies continue to use different rating systems or have developed their own, ultimately resulting in no consistent definition and measure of quality early childhood education state-wide.

Without a common definition and measurement of quality, it is difficult for providers to develop a truly high-quality program, as measured against other high-quality programs. It is also difficult for early childhood educators to change the narrative that portrays their programs as babysitting, when in fact it is early education and foundational preparation for the K-12 system and beyond. Without changing the view of these programs as the high-quality education settings that they are, it is difficult to create an argument for pay parity and fair wages for providers, and to provide the needed supports and trainings so that all early care providers are ensuring delivery of high-quality education.

¹³ New York State Office of Children and Family Services, Division of Child Care Services: Testimony on the Child Care and Development Fund Plan Submitted by The Committee for Hispanic Children and Families, Inc. (2018).

Supporting High-Quality Early Childhood Education – Policy Priorities and Recommendations:

| | Coalition Alignment | State |
|---------------------------------------|---------------------|--|
| Supporting CCR&Rs | CHCF | <p>CHCF urges the state to allocate sufficient funds to CCR&Rs to</p> <ul style="list-style-type: none"> • continue providing consumer education on child care to help the most vulnerable parents; and • provide community-based trainings (in the home language of the provider) to strengthen the quality of child care across the state, especially in our most under-resourced communities <p>In response to the climate of fear and uncertainty among immigrant families in accessing any government-run social program or support, CHCF calls on New York State and all government agencies that work with the distribution of social services to lead a public education campaign that affirms the support of <i>all</i> New York families, regardless of mixed immigration statuses within families, that works to inform residents of their rights and their children’s rights to social programs and supports. For example, informing parents of a citizen child’s right to child care subsidy, regardless of the immigration status of the parents. (See Public Charge content in Section III.)</p> |
| Quality Rating and Improvement System | CHCF | <p>CHCF advocates for a unified QRIS that is responsive to the pluralistic needs of this incredibly diverse sector of professionals</p> <ul style="list-style-type: none"> • Responsive meaning: <ul style="list-style-type: none"> ✓ available in other languages ✓ with multiple pathways to entry ✓ scaffolded for multiple degrees of formal education and experience ✓ low cost ✓ adaptable to long-standing workflows (CCR&Rs, etc.); and ✓ adaptable to subsidy and licensing requirements for Family Child Care (FCC) |

High-Quality Education and Youth Development

Executive Summary:

The Committee for Hispanic Children and Families believes that every child deserves access to high-quality, well-resourced, and physically accessible educational environments which are culturally responsive, safe spaces that cultivate academic excellence, the development of socially aware and responsible individuals, and connect youth to opportunities for future success. Furthermore, we believe that families have the inherent right to be empowered and engaged as key stakeholders in their child(ren)'s education.

The Committee for Hispanic Children and Families is dedicated to ensuring that all children and youth have access to high quality education and opportunity, with a focus on student groups who are often underserved and underrepresented in educational and career opportunity and advancement. CHCF supports K-12 education by providing high-quality, culturally and linguistically responsive out-of-school-time programming at two elementary schools and one middle school in the Bronx; as well as serving as the partner organization at a community school in the Bronx, collaborating with the school administration to coordinate community resources and supports for our students. Additionally, CHCF is working with one high school in Brooklyn to roll out a restorative practices model to replace disciplinary practices that were pushing young people out of their education. Through these programs we are able to meaningfully connect with and engage the communities, families, and students that we serve. We recognize that their voices are often not invited to the table in shaping the course of their own or their child(ren)'s access high-quality education and opportunity. We seek to work together with our communities and all stakeholders to change the pattern of suppression against under resourced and underrepresented groups.

There is an opportunity to openly address systemic disparities with the upcoming implementation of the New York State ESSA Plan. The chance to access and discuss student subgroup data and existing or lacking supports in schools throughout the state can help us to open a healthy and supportive dialogue between all community and school stakeholders about best practices, that are evidence-based.

In addition to the accountability data that will now be reported across the state, several coalitions across New York City and State continue to request and share insightful data as a means of recognizing systemic disparities that we can work together to correct so that all students, regardless of location, race, gender identity, ability, income level, language, housing stability, or immigration status are being given equitable access to a high-quality education and opportunity.

Educational Equity and Excellence for All

School Culture and Climate:

Children and youth spend a significant part of their developmental years in school. As an extension of the support and guidance that children receive from their family or guardians, school staff and educators are meant to create a safe and supportive environment in which children can continue to learn, grow, and access opportunity. The atmosphere and sense of welcome in a school building is something that should be mindfully designed and is felt when families and students enter the building. It is reflected in the ways that students' cultures and identities are represented and celebrated in their education. It is reflected in the ways that families are communicated with, engaged and empowered as valuable stakeholders in their child's education and development. It is demonstrated in the school's ability to be responsive to the needs of the community that it serves. Creating a space that is welcoming, culturally responsive, and supportive is the foundation of a space where students can fully thrive in their development and education.

The New York City Department of Education recently released the results of the 2017-18 School Quality Survey.

| Personal Support | Agree or Strongly Agree | Disagree or Strongly Disagree |
|---|--------------------------------|--------------------------------------|
| Students feel teachers support them when they are upset. | 53% | 47% |
| Students say that there is at least one adult in the school that they can confide in. | 81% | 19% |
| Students say teachers treat them with respect. | 88% | 12% |
| Students say most of the students at their school treat each other with respect. | 59% | 41% |
| Preventing Bullying | | |
| Students are rarely or never harassed, bullied, or intimidated by other students in their school. | 57% | 43% |
| ...because of race, religion, ethnicity, national origin, or citizenship/immigration status | 70% | 30% |
| ...because of gender, gender identity, gender expression, or sexual orientation at their school. | 73% | 27% |
| ...because of other differences, like disability or weight. | 66% | 34% |
| Safety | | |
| Students feel discipline is applied fairly in their school. | 73% | 27% |
| Students feel safe outside around their school. | 78% | 22% |
| Students feel safe travelling between home and school. | 85% | 15% |
| Social-Emotional Support* | | |
| Teachers say adults in their school recognize disruptive behavior as social-emotional learning opportunities. | 77% | 23% |
| Teachers say adults at their school have access to school-based supports to assist in behavioral and emotional escalations. | 79% | 21% |

*Students weren't surveyed about how they are emotionally supported by their teachers and school staff.

Culturally Responsive and Sustaining Education:

CHCF appreciates the steps that New York State Education Department (NYSED) is taking towards developing Culturally Responsive and Sustaining Education, in partnership with NYU Metropolitan Center for Research on Equity and the Transformation of Schools. NYSED has based the development of their plan on the research of Django Paris' Culturally Sustaining Pedagogy, "which seeks to support young people in sustaining the cultural and linguistic

competence of their communities while simultaneously offering access to dominant culture competence.”¹⁴ CHCF equally recognizes the persistence of deficit approaches, which have been commonly practiced throughout U.S. history, specifically against marginalized and oppressed groups, that view languages and cultures of many students and communities of color as deficiencies that need to be overcome and replaced by the dominant language and culture. Paris continues to analyze the limitations of terms such as culturally responsive and relevant practices, noting the potential limitations in how far they go towards maintaining the multiethnic and multilingual society that has been the basis of our nation from its outset. We must shift our practices to asset-based learning, celebrating the pluralism of our communities, and CHCF supports a state-led initiative for guiding all districts to develop more culturally responsive and sustaining practices.

Teacher Diversity:

An important part of creating culturally responsive spaces means having educators that reflect the student population and community. A new study by the Education Trust – New York speaks to national research demonstrating that for students of color, having a teacher of color during their educational experience can improve student performance in math and science, increase the likelihood that Black students are identified as gifted, reduce suspensions, decrease dropouts, and improve students’ hopes of attending college. The study further sheds light on the magnitude of this discrepancy in New York State with previously unreported data. Statewide, 43% of the student population is Black and Latino (17% and 26%, respectively), yet only 15% of educators across New York State are Black and Latino (8% and 7%, respectively). 195,000 Black and Latino students across New York State attend schools with no or just one teacher of the same race or ethnicity. Outside of the Big Five school districts, Latino and Black students are 13 times more likely to have no exposure to a same-race or ethnicity teacher – this equates to 98,000 Latino and Black students in New York State.

Of additional interest from the research, Latino and Black educators are better represented in school leadership across the state (33% of assistant principals and 24% of principals), although this varies by locality. Schools with leaders of color are more likely to have a greater share of Black and Latino teachers and to have higher enrollment of students of color and low-income students.¹⁵

Parent Engagement and Empowerment:

Parents, families, and guardians are invaluable partners in the education and development of their child(ren). As we are moving to create culturally responsive and safe spaces for our children, parents should be engaged in the conversation of what that looks like and how they can support the development done in the school. As the saying goes – it takes a village. Only 53% of parents responded to the New York City School Quality Survey in 2017-18. While a high percentage of families (91%) said school staff regularly communicate with them about how they can help their child learn, (94%) feel well informed by the communications they receive from their school, and (97%) are communicated with in a language and manner that they can understand, 31% of those parents did not have an opportunity to volunteer time to support their school. However, 47% of families/parents not responding to the

New York City 2017-18 School Quality Guide (2018). New York City Department of Education.

https://tools.nycenet.edu/guide/2018/#dbn=City&report_type=ALL

¹⁴ Paris, D. (2012). Culturally Sustaining Pedagogy: A Needed Change in Stance, Terminology, and Practice. *Educational Researcher*, Vol. 41, No. 3, pp.93-97.

¹⁵ See Our Truth: The State of Teacher and School Leader Diversity in New York, and Why It Matters for Students, Educators, and Our Future (2017). The Education Trust – New York. <https://seeourtruth.edtrustny.org/>

survey to share their experience has connotations.¹⁶ Which parents participated? Who did not participate and why might that be?

At the schools that CHCF serves, we have varying rates of parent participation in the school quality survey – 24% of parents at the Bronx High School of Business, 58% at PS/MS 279, and 100% at PS 59. At the community forum on education that we hosted in May of 2017, we addressed the issue of parent engagement. Parents overwhelmingly felt that the ways in which schools attempt to engage parent input and feedback, mainly through the survey, don't seem effective. Parents expressed concerns over where the survey information actually goes and whether it ultimately impacts the quality of their child(ren)'s school and education. This sense of dismissiveness towards what parents have to say discourages parents from participating in one of the few opportunities for input in the educational process. This should be something that all districts and schools actively try to remedy as parents are key stakeholders in their child(ren)'s education, supporting the valuable work that is done in the classroom.

Parents who work non-traditional hours or have a primary language other than English are often not engaged in the same way as other parents and CHCF feels that this is a tremendous disservice to students. The current New York State ESSA plan is beginning to bolster the value of parent engagement specifically in the school improvement planning for schools that are identified for support and improvement. The New York City Chancellor has begun pushing the conversation further, calling for intentional parent empowerment, rather than just engagement. What a tremendous moment to reshape the 'traditional' models for parent engagement (i.e. PTAs) which are often (perhaps unintentionally) exclusionary in their practice. The State Department of Education and the New York City Department of Education have an opportunity to shape best practices and require schools to build an effective parent engagement and empowerment model.

Restorative Practices:

New York State law surrounding school discipline lays the foundation for zero-tolerance policies and punitive practices. Zero-tolerance practices were put in place under the assumption that punishment would deter students from further misbehavior, creating better educational environments. These practices essentially have rigid codes of conduct and invoke suspensions or expulsions for set violations. There are no elements of rehabilitative support to guide students in improving their behaviors. These practices also go hand in hand with the presence and involvement of law enforcement in schools. Ultimately, schools are becoming a part of the criminal justice system by involving law enforcement agents in school discipline of typical adolescent behavior.¹⁷ When we consider that students of color, students with disabilities, and low-income students are disproportionately suspended, expelled, and handcuffed in schools,¹⁸ the impact is clear – we need to recognize that this perpetuates the systemic oppression of populations that have been historically targeted and suppressed as members of our society. At the same time there is a persistent underinvestment in school counselors and social workers that could lead restorative interventions as a proactive measure of support for our students.

Regardless of messaging from some policy makers expressing a desire to decrease punitive discipline, we must look to data that demonstrates a strong hold of these punitive practices – which have recently seen an increased

¹⁶ New York City 2017-18 School Quality Guide (2018). New York City Department of Education.
https://tools.nycenet.edu/guide/2018/#dbn=City&report_type=ALL

¹⁷ Bullies in Blue: The Origins and Consequences of School Policing (2017). The American Civil Liberties Union Foundation.
https://www.aclu.org/sites/default/files/field_document/aclu_bullies_in_blue_4_11_17_final.pdf

¹⁸ Civil Rights Data Collection: 2013-2014 State and National Estimates. (2017). The U.S. Department of Education.
https://ocrdata.ed.gov/StateNationalEstimations/Estimations_2013_14

endorsement under the guise of school safety in response to school shootings and a climate of fear. The reality is Latino students are 1.4 times as likely as their white peers to attend a school with a school law enforcement officer and no counselor, Asian students are 1.3 times as likely, and Black students are 1.2 times as likely.¹⁹ In New York City (2016), there were 2.9 counselors for every 1,000 students – or 345 students to one counselor – and 5.28 school security staff per 1,000 students. When looking at both counselors and social workers across New York City, for every one school security officer there is .78 counselor/social worker.²⁰ While Black and Latino students make up 70% of city public school students, 90% of in-school arrests were Black or Latino students (2013). In 2016, 98.5% of students who were arrested during a mental health crisis were Black or Latino; and 100% of incidents where a student was placed in handcuffs with no charges ultimately being filed were Black or Latino students.²¹

We must change state law surrounding school safety and discipline and invest in restorative practices that provide holistic support for our students that work to keep children positively engaged in their education, rather than push them out, develop positive student behavior, and intervene when students are experiencing trauma or a mental health crisis.

Safe Spaces:

While it should be guaranteed that children are safe when they enter a school building, the dialogue around creating safety should not center solely upon physical safety and in-school violence; nor should it focus on the school in isolation from the community in which it exists. In response to the recent gun violence tragedies in schools, the conversation has quickly shifted to forceful defense of the school. At the same time, rising and ongoing violence in many low-income communities of color continue to be disregarded as something separate from the school space. Our young people are being let down. Schools should be considered an extension of and support to the community itself. It should be a space to find social and emotional support as a proactive intervention to crisis, a space to connect our young people to positive opportunities. Schools should be a space that supports and fosters positive relationships and connections to the community itself.

Instead, we are positioning ourselves to continue to invest in the institutionalization of our schools. Creating spaces that might have the intention of physically protecting our young people, but ultimately deteriorate the supportive nature of school and perpetuate the school to prison pipeline against very specific student groups.

¹⁹ 2013-2014 Civil Rights Data Collection: New Release for 2016. The U.S. Department of Education Office for Civil Rights. <https://www2.ed.gov/about/offices/list/ocr/docs/2013-14-first-look.pdf>

²⁰ Barnum, M. (2016) Data Shows 3 of the 5 Biggest School Districts Hire More Security Officers Than Counselors. The 74. <https://www.the74million.org/article/exclusive-data-shows-3-of-the-5-biggest-school-districts-hire-more-security-officers-than-counselors/>

²¹ Bullies in Blue (2017). The ACLU Foundation.

Educational Equity and Excellence for All – Policy Priorities and Recommendations

| | Coalition Alignment | City | State |
|--|---|--|---|
| School Culture and Climate | Education Trust-NY, New York Immigration Coalition, Advocates for Children, CHCF | <p>Adopt the Safe Havens Recommendations State-wide</p> <ol style="list-style-type: none"> 1. Ensure that all students and their families are welcomed regardless of immigration status or national origin 2. Address handling collection, retention, storage, and release of information that includes students' and families' immigration status, place of birth, country of origin, years in U.S. schools, and U.S. entry 3. Mandated protocol and training for response to requests by federal authorities regarding enforcement of immigration laws 4. Mandated protocol and training to support students and families when a parent, family member, or guardian is at risk of deportation or has been deported | |
| | | | |
| Culturally Responsive Spaces and Practices | Coalition for Educational Justice | <ul style="list-style-type: none"> • CHCF commends the Mayor for allocating \$23 million in the executive budget for a CRE and Anti-Bias Training • Monitor the implementation of these funds • Provide ongoing funding to sustain continued teacher and staff training on culturally responsive and restorative methods • Allocate funding for the development of culturally responsive and sustaining curriculum, that is ongoing throughout the K-12 system | |
| | CHCF | <ul style="list-style-type: none"> • CHCF will advocate to align NYC DOE practices with the NYSED framework as part of a larger belief in state-wide collaborative practices • CHCF recommends that as part of the negotiations for extending its contract with NYPD, the DOE require all school safety officers to participate in the district-wide anti-bias training | <ul style="list-style-type: none"> • CHCF commends NYSED on engaging in conversations with stakeholders around the development of a culturally responsive and sustainable framework to be practiced across the state |

| | | | |
|---------------------------------------|---------------------------------------|---|---|
| Teacher Diversity | Equity Coalition | See Our Truth <ul style="list-style-type: none"> Strengthen the teacher preparation pipeline for teachers of color Improve recruitment and hiring at the school district level Focus greater attention on retention, support, and career advancement for educators | |
| | CHCF | We commend the DOE Chancellor for his thoughts on building out a career “lattice” for educators | |
| Parent Engagement | CHCF/Equity Coalition | | <ul style="list-style-type: none"> SED gather and share out guidance for best practices for meaningful parent engagement SED mandate schools identified for CSI or TSI inform parents not only of their right to transfer schools, but the timeline for engagement in the school improvement process, that is linguistically accessible |
| | CHCF | <ul style="list-style-type: none"> Increased investment in funds specifically mandated for School Counselors and Social Workers to shift to an equal or higher proportion of social-emotional support services in schools to school security officers, especially in districts of higher need Require NYPD School Safety Officers to complete the same anti-bias and culturally responsive practices training mandated for DOE educators, administrators, and support staff | We commend the NYS Legislature for including \$2 million in funding for Safe and Supportive Schools, however, this was mostly directed towards the Dignity for All Students Act and does not eradicate the need for the bill to systemically move away from zero-tolerance disciplinary practices throughout NYS. |
| Safe Spaces and Restorative Practices | CHCF | | |
| | Safe and Supportive Schools Coalition | | CHCF calls on the NYS Legislature to pass the Safe and Supportive Schools Bill S3036A/A3873A (2017-2018) |

Equity in Access to Academic Supports and Opportunity

English Language Learners (ELLs):

New York State enrollment for English Language Learners has been steadily increasing from 208,015 in 2010-11 to 237,076 in 2016-17. The top home language for English Language Learners is Spanish at 64.9%, with Chinese at 9.5% and Arabic at 4.9% as the next largest ELL home language groups.²² Yet, we continue to see concerning trends that reflect the lack of investment in appropriate supports for this student group.

New York State continues to report a shortage of bilingual educators²³ and more alarmingly, a significant percentage of bilingual educators teaching with no certification in that subject – for example, nearly 15% of bilingual teachers in western New York didn't have subject-specific certification, and 19% of bilingual teachers in New York City were without subject-specific certification (2015-2016). One major cause of this issue is a lacking recruitment and pipeline for teachers, and specifically teachers of color, into this certification area.²⁴

Some of the indicators we can look to that suggest the impact of lacking supports for this student group are the New York State ELA and Math scores, as well as the graduation and drop-out rates. In 2017-18 only 9% of English Language Learners were proficient on the NYS 3-8 English Language Arts exam, compared to 49% of non-ELLs; 16% of English Language Learners were proficient on the 3-8 Math exam, compared to 48% of non-ELLs.

High school is a major entry point for English Language Learners; over a quarter of ELLs in New York State are in high school. 27% of English Language Learners graduated in 2017, compared to 83% of their non-ELL peers; 30% of English Language Learners dropped out in 2017, compared to 5% of their non-ELL peers.²⁵

Access to Rigorous Coursework:

A new report by the Education Trust-New York analyzes student access to gatekeeper courses, which are middle and high school courses that provide the opportunity to advance to higher-level courses, to develop critical skills, or to explore new passions and abilities. These courses can also develop college, career, and civic readiness.

Across New York State, Black and Latino students are less likely than their White peers to attend schools where gatekeeper college- and career-prep courses are offered. Black and Latino middle schoolers attend a school with no Algebra I course at 3 times the rate of their white peers. Black and Latino high school students attend a school with no AP/IB courses in any subject at 1.5 times the rate of their White peers, attend a school with no advanced foreign language courses at 6 times the rate, and attend a school with no music program at 9 times the rate.

In schools that do offer these gatekeeper courses, Black and Latino students are under-enrolled in these courses. In middle school Algebra I, 9.5 Black students and 9.3 Latino students are enrolled for every 100 students, compared to 20.9 Asian and 17.1 White students. In High School AP/IB Math or Science courses, 5.4 Black students and 5.7 Latino students are enrolled for every 100 students, compared to 27.4 Asian and 14.4 White students; and in High School

²² New York State Education Department ELL Demographics and Performance 2015-2016 (2017). New York State Education Department. http://www.nysed.gov/common/nysed/files/ell_demographicperformance_2017-ver-1516.pdf

²³ Gais, T., Backstrom, B., Malatras, J., and Joo Park, Y. (2018). The State of the New York Teacher Workforce. The Rockefeller Institute of Government at SUNY.

²⁴ Teacher Shortage? What Teacher Shortage? (2017). New York State School Boards Association.

²⁵ New York State Education Department Data (2018).

Advanced Foreign Language courses, 11.1 Black students and 18.6 Latino students enroll for every 100 students, compared to 25.2 Asian students and 31.4 White students.²⁶

School Integration:

Although the issue of Specialized High Schools and the proposal to eliminate the use of the SHSAT as the sole determinant for student acceptance into these schools has become a political hot spot within the education debate, the Committee for Hispanic Children and Families recognizes this as just another reflection of the larger issue of systemic segregation and the underrepresentation of marginalized student groups in programs for opportunity throughout New York City. The reality is, only about 1.5% of the 1.1 million New York City public school students attend these elite schools.²⁷ On a larger scale, New York City remains one of the most segregated school districts in the country.²⁸ Black and Latino NYC students have an 80% chance of attending a school with fewer than 10% White students. 50% of White students are attending school in 7% of NYC schools.²⁹ CHCF recognizes that school segregation does not exist in a vacuum – a multitude of systems factor in to the creation of neighborhood and school segregation, including district zoning, the ever-rising cost of housing in New York City, and the pocketed availability of affordable housing options, as well as the complicated system of school choice for NYC middle and high schools.

Access to Programs for Opportunity:

We must also look at the disparities of access to programs that often feed into later opportunities for academic success, such as admissions to specialized high schools. Black and Latino students make up about 70% of the public-school student population, yet only represent 22% of those in gifted programs city-wide; and only 10% of the students accepted into specialized high schools.³⁰ Low-income families make up 74% of the public-school population and only 34% of gifted programs.

It also seems that access to gifted programs is impacted by where you live. The city-wide average of students attending gifted programs is 2.5%. In Manhattan districts, 5.42% of students attend a gifted program with the largest pocket (11.47% student attendance in gifted programs) in District 1 (Lower East Side), followed by the second and third highest student participation rates in District 2 (Lower Manhattan/Upper East Side at 7.31%) and District 3 (Upper West Side at 7.5%). Students in Brooklyn and the Bronx are accessing these programs at significantly lower rates. Only .55% of students in the Bronx are enrolled in gifted programs, with Districts 7 (South Bronx) and 12 (Crotona Park) both at 0%. In Brooklyn, only 1.86% of students are enrolled in gifted programs, with Districts 16 (Bed-Stuy) and 23 (Brownsville and East New York) both at 0%.³¹ It should be unsurprising that there are parallels with acceptance to specialized high schools. 7 of the ten middle schools with the highest acceptance rates for specialized

²⁶ Within Our Reach: An agenda to ensuring all New York students are prepared for college, careers, and active citizenship (2018). Education Trust – New York/ The New York Equity Coalition. <https://equityinedny.org/course-access/>

²⁷ 2013-2018 Demographic Snapshot of Schools (2018). New York City Department of Education. <https://data.cityofnewyork.us/Education/2013-2018-Demographic-Snapshot-School/s52a-8aq6/data>

²⁸ New York Schools Most Segregated in the Nation (2014). The Civil Rights Project, UCLA. <https://www.civilrightsproject.ucla.edu/news/press-releases/2014-press-releases/new-york-schools-most-segregated-in-the-nation>

²⁹ Piller, A (2016). I'm a New York City Administrator. Here's How Segregation Lives On. The Vox. <https://www.vox.com/2016/2/16/10980856/new-york-city-schools-segregation>

³⁰ Veiga, C. (2018). Can a proposal to expand gifted classes help integrate New York City's specialized high schools? Chalkbeat. <https://chalkbeat.org/posts/ny/2018/07/31/can-a-proposal-to-expand-gifted-classes-help-integrate-new-york-citys-specialized-high-schools/>

³¹ Veiga, C. and Glen, S. (2017). Here are the New York City school districts with the highest and lowest percentages of students enrolled in gifted programs. Chalkbeat. <https://www.chalkbeat.org/posts/ny/2017/01/26/here-are-the-new-york-city-school-districts-with-the-highest-and-lowest-percentages-of-students-in-gifted-programs/>

high schools are in 4 of the districts with the highest enrollment in gifted programs (Districts 1, 2, 3, and 20).³² Again, while a small percentage of New York City students are involved with these programs, we should be mindful of how these instances are reflective of the larger issues of disproportionate representation throughout city districts, underrepresentation in programs of opportunity for Black and Brown students, underlying beliefs about populations that seem to be at play, and consistent underinvestment in certain communities.

CHCF believes that correcting school segregation and underrepresentation in specialized high schools and other gifted programs cannot be remedied solely by looking at the admissions process. The City needs to expand access to opportunity system-wide. There should not be limitations in access to rigorous programs for “gifted” students who are identified at the age of four. All students should be given rigorous coursework and supports to excel to their fullest potential, and additionally be made aware of school-choice options that meet their skills and interests. Ultimately, only 2.5% of students city-wide attending gifted programs and 1.5% attending specialized high schools is an absolute disservice to the remaining 98% of students, all of whom possess gifts and skills, who may or may not be attending schools that have the supports to help them thrive and grow to their fullest potential.

³² Veiga, C. and Park, S. (2018). Where specialized high school students come from (and where they don't). Chalkbeat.
<https://www.chalkbeat.org/posts/nyc/2018/06/14/where-specialized-high-school-students-come-from-and-where-they-dont/>

Equity in Access to Academic Supports and Opportunity – Policy Priorities and Recommendations

| | Coalition Alignment | City | State |
|---------------------------|---|--|-------|
| English Language Learners | New York Immigration Coalition Education Collaborative | Continue to monitor the use of the \$13 million that was allocated in 2013 for English Language Learners supports | |
| | | Continue to support the Professional Development and monitor the practices of Family Welcome Center staff to ensure families are accessing schools and programs that meet the needs of their children | |
| | Hispanic Federation LEAD Coalition | Allocate \$110 million in funding to meet the needs of Multilingual Learners (MLLs)/English Language Learners (ELLs) <ul style="list-style-type: none"> • \$85 million earmarked for MLLs of the Foundation Aid owed • \$7 million to address shortage of bilingual education teachers • \$3 million to fund a targeted initiative to increase Multilingual Learners' graduation rates <ul style="list-style-type: none"> ○ Support performance and portfolio-based assessments ○ Translate high school curriculum ○ Provide out-of-school-time academic supports for high school MLLs • \$5 million to provide additional academic supports for all Multilingual Learners <ul style="list-style-type: none"> ○ Out-of-school-time academic supports for MLLs, including extended learning time, after-school, and summer academies, as well as targeted programming for MLLs performing below grade level and SIFEs (Students with Interrupted Formal Education) • \$1 million to increase parent information and outreach in native languages • \$5 million to increase social-emotional supports of MLLs <ul style="list-style-type: none"> ○ Increase professional development for social workers and counselors in schools with MLL populations ○ Pilot targeted school-based mental health programs in schools with high MLL populations ○ Increase the number of bilingual social workers and counselors in schools with MLL populations | |

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| Access to Rigorous Coursework | Equity Coalition | <p>5X25 Campaign</p> <p>We call on New York’s leaders to fulfill 5 commitments to every student in the Graduating Class of 2025 – the cohort of students who are entering 6th grade in fall of 2018:</p> <ol style="list-style-type: none"> 1. Leverage the state’s new accountability system to enhance transparency and implement school improvement strategies that support equitable access to rigorous courses 2. Require that families receive better information and expand access to school counselors and other resources 3. Establish a default college- and career-prep course sequence that all students are automatically enrolled in, backed by high expectations and support for educators and students 4. Expand access to AP, IB, dual enrollment courses, proven programs like P-TECH, and employer-based internships (college and career connections) 5. Update New York’s course requirements for high school graduation, including adding a fourth year of math |
| | | |
| School Integration and Access to Programs of Opportunity | DOE Diversity Advisory Group | CHCF continues to support the work of the DOE Diversity Advisory Group – full report pending, December release |
| | CHCF | <p>Specialized High Schools</p> <ul style="list-style-type: none"> • NYC DOE must open up access and opportunity to all students, regardless of race, ethnicity, immigration status, native language, income level, and location, which cannot be achieved merely by eliminating the SHSAT as the sole determinant for admittance • In addition to implementing a portfolio-based admissions process, the NYC DOE must analyze student access to middle schools that are actively preparing students to apply to specialized programs • NYC DOE must also look at expanding the number of seats not only in specialized high schools, but in gifted programs and other programs that allow access to further specialized opportunity <p>Gifted and Talented Pipeline</p> <ul style="list-style-type: none"> • Gifted program eligibility should not be determined at age 4 through a test – if a test is to be used, there are issues around parent awareness of and access to this opportunity for their child(ren) |

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| | | <p>CHCF encourages movement towards the ultimate removal of “Specialized/Gifted” programming that only a small facet of students is accessing</p> <ul style="list-style-type: none"> • We must view all children from an asset-lens, rather than a deficit-lens, which is created when 98% of students aren’t “good enough” to get into the most elite programs • Roughly 98% of public-school students do not attend a gifted program or a specialized high school, the NYC DOE should be preparing a plan that ensures every student is accessing rigorous programming and curriculum, with appropriate resources and supports, regardless of subjective identification as being “gifted.” Every child has gifts, talents, and skills and should be invested in as such. • If systems of specialized programming must continue, the NYC DOE must address the gate-keeper nature of information surrounding access to these programs. Every student/parent should be made aware of opportunities that fit student interests and skillsets throughout their time in the public PreK-12 system. | |
| | <p>Integrate NYC³³ *CHCF believes that the 5 Rs should apply to all elementary and middle schools, in addition to public high schools as proposed by Integrate NYC</p> | <p>To fully integrate New York City schools, NYC DOE must address the 5 Rs:</p> <ol style="list-style-type: none"> 1. Race and Enrollment – New York City schools must provide a diverse and inclusive environment for every* public school student 2. Resources – NYC DOE must equitably distribute resources across all NYC schools to provide a “sound, basic education” 3. Relationships – All NYC schools must be considerate and empathetic to the identities of all students, focus on the power of different backgrounds, and act to build relationships between students across group identities | |

³³ <https://www.integratenyc.org/realintegration>

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| | <p>*CHCF believes any form of law enforcement does not have a place in schools, including but not limited to police, military, and ICE.</p> | <p>4. Restorative Justice – All NYC schools are free of any law enforcement official presence*, are safe, treat the student body as one, are free of metal detectors, protect the integrity and humanity of each student, and help build student leaders</p> <p>5. Representation – All NYC schools hire faculty that is inclusive and elevates the voices of communities of color, immigrant communities, and the LGBTQ community so that student identities and experiences are reflected in the leadership</p> | |
| ESSA Implementation | Equity Coalition | <ul style="list-style-type: none"> As CHCF actively follows the NYS ESSA implementation, our primary concerns center around the school identification process <ul style="list-style-type: none"> Once identified, schools should conduct a needs and assets assessment, that not only takes in to consideration the gaps in supports and services, but highlights assets that the school possesses – starting the improvement process through a deficit lens does not necessarily set the stage for positive and meaningful stakeholder conversations Mandated requirements around schools inviting and supporting stake holder participation – parents should be notified in their home language about the process of school improvement and given a timeline and opportunities to participate in the process in a culturally and linguistically accessible way Access to rigorous coursework – 5x25 commitment (See above) CHCF supports the Federal Government and New York State efforts of creating transparency for school/district budget/funding allocation and student group data <ul style="list-style-type: none"> CHCF will continue to advocate for accessible information that is digestible by any and all stakeholders in a child’s education | |
| College and Career Readiness | Hispanic Federation LEAD Coalition | <ul style="list-style-type: none"> Increase number of college counselors and access to postsecondary readiness training Better support community-based organizations (CBOs) in providing academic and postsecondary support Increase parent knowledge on the college going process Increased data sharing with institutions of higher education Increase opportunities for career readiness | |

After-School/Out-of-School-Time Opportunities

High-Quality After-School:

Having access to high-quality extended learning time programming has a proven track record of improving students' achievement in school. Providing students with consistent enrichment activities such as music, art, sports, conflict resolution, cultural experiences, and other alternative ways of learning, after-school learning improves students' social skills, gives them more confidence, creates higher educational and career aspirations, and motivates them to consistently attend school. Additionally, after-school programs serve as an economic support for families. A study of programs in New York City found that 74% of parents said they could more easily keep their job than before because they had access to a program and 73% missed less work.³⁴

Public funding for after-school is widely supported – in fact, 85% of parents surveyed in a poll by Afterschool Alliance are in support of such funding. High-quality after-school programs are endorsed by law enforcement organizations because they are effective in reducing violence, theft, vandalism, gang activity, and other adolescent crimes. Consistent participation in quality after-school programs helps reduce the risk of youth experimenting with alcohol and other dangerous drugs, and teen pregnancy.³⁵

New York State after-school and summer programs continue to be underfunded, both to serve *all* eligible youth and to ensure that a high-quality program is being delivered. New York State currently funds after-school programs, or after-school and summer programs, at an annual per student rate of \$1,375 for Advantage After-School and \$1,600 for Empire State After-School, 21st Century, and Extended School Day/School Violence Prevention. These rates are significantly lower than the cost required to implement high-quality after-school programs, let alone provide enough funding for a year-round model that includes a summer component. The Network for Youth Success recently did an analysis of the cost of high-quality after-school and summer programs in New York State (based on the Wallace Foundation study and calculator):^{36 37}

| Per Student Cost for Elementary School After-school Program ³⁸ | |
|--|-------------|
| City | Median Cost |
| Buffalo, NY | \$2,892.13 |
| Albany, NY | \$3,415.50 |
| Brooklyn, NY | \$5,303.25 |
| Manhattan, NY | \$6,767.47 |
| Per Student Cost for Elementary and Middle School Program | |
| City | Median Cost |
| Buffalo, NY | \$4,082.48 |
| Albany, NY | \$4,821.25 |
| Brooklyn, NY | \$7,485.97 |
| Manhattan, NY | \$9,552.83 |
| Programs serving multiple age groups usually have higher costs for staff salaries and materials that are meant for developmentally different groups. | |

³⁴ The Value of Afterschool Programs (2016). The New York State Network for Youth Success. <http://networkforyouthsuccess.org/wp-content/uploads/2017/08/Afterschool-Fact-Sheet-July-2016.pdf>

³⁵ American After 3PM (2014). The Afterschool Alliance. http://www.afterschoolalliance.org/documents/AA3PM-2014/AA3PM_National_Report.pdf

³⁶ The Cost of High-Quality Afterschool and Summer Program (2018). New York State Network for Youth Success.

³⁷ Baldwin-Grossman, J., Lind, C., Hayes, C., McMaken, J. and Gersick, A. (2009). The Cost of Quality Out-of-School-Time Programs. The Wallace Foundation. <https://www.wallacefoundation.org/knowledge-center/Documents/The-Cost-of-Quality-of-Out-of-School-Time-Programs.pdf>

³⁸ The Out-of-School-Time Cost Calculator. The Wallace Foundation. <https://www.wallacefoundation.org/cost-of-quality/pages/default.aspx>

| Per Student Cost for Elementary School Summer Program | |
|--|-------------|
| City | Median Cost |
| Buffalo, NY | \$1,229.13 |
| Albany, NY | \$1,451.55 |
| Brooklyn, NY | \$2,253.83 |
| Manhattan, NY | \$2,876.10 |
| Per Student Cost for Elementary and Middle School Summer Program | |
| City | Median Cost |
| Buffalo, NY | \$1,192.39 |
| Albany, NY | \$1,408.16 |
| Brooklyn, NY | \$2,186.46 |
| Manhattan, NY | \$2,790.14 |

After-school has a tremendous investment rate for public funding. In an independent study conducted by the Rose Institute at Claremont McKenna College in 2002, researchers found that every dollar invested in high-quality after-school programs saves taxpayers roughly \$3.14. If benefits from crime reduction are factored in, each dollar invested in an at-risk child saves \$8-\$12.³⁹

Youth Employment Opportunities

New York City has the largest summer youth employment program in the country. Research show that such programs provide income support to youth and their families, foster summer work experience that could improve future employment outcomes and/or educational outcomes, and help keep youth involved in socially productive activities and out of trouble. These programs are particularly beneficial for low-income youth with limited networks for employment and opportunity. Additionally, a study through New York University found that participants had better school attendance and were more academically engaged in the year following program participation.⁴⁰ A 2014 study by the National Bureau of Economic Research found that there were moderate decreases in average earnings in the three years following the program, and there was no impact on college enrollment – indicators that the NYC taskforce recognized as a call for further evaluation and refinement of the program. The report did, however, find that the SYEP did increase average earnings and the probability of employment in the year of program participation and decreased the probability of incarceration and death.⁴¹

Although the city has been slowly growing the number of available slots from 35,957 in 2013 to 60,113 in 2016, 65,000 in 2017⁴² and 70,000 in 2018⁴³, many youths continue to be denied this opportunity. A report released by the Community Service Society estimated that over 110,000 youth applied for a SYEP slot in 2015, only 54,263 were accepted – roughly 50% were denied.⁴⁴ New York City has additionally introduced the Work, Learn, Grow (WLG) in 2015 to provide 6,000 youth with year round career-readiness training and paid employment opportunities.

³⁹ The Value of Afterschool Programs (2017). Network for Youth Success. <http://networkforyouthsuccess.org/wp-content/uploads/2017/08/Afterschool-Fact-Sheet-July-2016.pdf>

⁴⁰ Youth Employment Task Force Report (2017). New York City Mayor Bill DeBlasio and Council Speaker Mark-Viverito commissioned report. <https://www1.nyc.gov/assets/home/downloads/pdf/reports/2017/Youth-Employment-Taskforce-Report.pdf>

⁴¹ Gelber, A., Isen, A. and Kessler, J. (2014). The Effects of Youth Employment: Evidence from New York City's Summer Youth Employment Program Lotteries. The National Bureau of Economic Research Working Paper. <http://www.nber.org/digest/apr15/w20810.html>

⁴² Youth Employment Task Force Report.

⁴³ NYC Department of Youth and Community Development Commissioner Bill Chong (2018). Stated in testimony to the New York City Council Committee on Education.

⁴⁴ Treschan, L. (2016). Extending the High School Year Through Universal Summer Jobs for New York City Youth. The Community Service Society. <http://www.cssny.org/publications/entry/universal-summer-jobs-for-new-york-city-youth>

After-School/Out-of-School-Time Opportunities – Policy Priorities and Recommendations

| | Coalition Alignment | City | State |
|---------------------------|---------------------------|--|---|
| High-Quality After-School | Network for Youth Success | | Budget Ask: Increase funding for after-school seats to be in line with the cost of providing high-quality after-school programming without reducing the number of students being served. |
| | CHCF | The Mayor should expand COMPASS to create universal after-school for elementary school to cover the gap between state funded programs | |
| Summer Youth Employment | CHCF | <ul style="list-style-type: none"> CHCF commends the Mayor and Council on producing the Youth Employment Task Force in 2017, recognizing and demonstrating the benefits of providing access to youth employment opportunities CHCF additionally commends the city on its efforts to continually increase the number of seats available to NYC youth through SYEP CHCF calls for an increase in funding for SYEP to make summer employment opportunities for 14-21-year-old youth universal CHCF additionally supports increased funding to expand WLG to eventual universal access for 16-21-year-old youth Increased funding should also support the Youth Employment Task Force recommendations: <ul style="list-style-type: none"> SYEP and WLG should be part of a broader series of in- and out-of-school opportunities for learning, work experience and career | |
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| | | <p>exploration, rather than as isolated, one-time programs. NYC should develop intentional pathways that offer multi-year, progressive experiences for youth.</p> <ul style="list-style-type: none"> ○ Ensure the right operations and systems are in place to support improved program quality | |
|--|--|--|--|

Community Schools

As the CBO partner at the Bronx High School of Business, CHCF has spent the past three years building a strong relationship with our students and families and has developed a true partnership with the school administration to deliver high quality, holistic supports and produce tremendous gains with our students. As part of the Coalition for Community School Excellence, we are engaged in the advocacy for equitable funding to support the community school model across New York City and State. We know that our school faces difficult funding circumstances, even with the additional support it gets as a Community School in New York City. Staffing shortages and the ability to effectively implement all elements of the community school model, including social emotional and mental health supports and services, are just a few of the ongoing challenges we face in our community school. There continue to be community schools and community-based organizations that are severely underfunded and constantly face funding insecurity. CHCF continues to advocate for reliable, appropriate, sustainable, and equitable funding that allows for fidelity to the community school model.⁴⁵

Community Schools – Policy Priorities and Recommendations

| Coalition Alignment | City | |
|--|---|--|
| Coalition for Community School Excellence | Sustainability <ul style="list-style-type: none"> • Work with the Division of Contracts and Procurement to speed up and facilitate payment to CBOs • OCS should offer differentiated trainings, including a funding stream for CBOs to lead trainings on their areas of expertise, and trainings for school leadership, district leadership, and school staff about the community school model Transparency and Accountability | |
| | Equity <ul style="list-style-type: none"> • Expand use of restorative practices, community liaisons to work with SSAs and Level 2s, and other strategies to advance positive school culture and climate in community schools • Provide cultural competency trainings for <i>all</i> school and CBO staff, including School Resource Officers, on implicit bias, racial disproportionality, and culturally responsive strategies, aligned with Chancellor’s citywide training initiative Fidelity to the Model <ul style="list-style-type: none"> • Funding equity across community schools | |

⁴⁵ NYC Council Committee on Education Budget Hearing: Testimony Submitted by The Committee for Hispanic Children and Families, Inc. (2018).

Students in Temporary Housing

Rent Burden and Cost of Living:

A steadily rising cost of living and consistently high percentage of residents facing rent burden (paying more than 30 percent of their household income towards rent) are leading to alarming increases in the number of students in temporary housing across the state. New York State saw an increase of over 4,600 students in temporary housing in the 2017-18 school year, bringing the state-wide total to 152,839 students living in temporary housing. In New York City, the number of students in temporary housing has grown from 65,921 during the 2009-10 school year to over 105,000 students in SY 2017-18 (an increase of over 1,000 students from SY 2016-17). The Bronx continues to see the highest concentration of students in temporary housing at 36%, with the largest pockets of these students in districts 9 and 10. During the 2017-18 school year, there were over 19,000 students in temporary housing in these two districts alone – that is 18 percent of the total city population of students in temporary housing concentrated in just two districts.⁴⁶ Much of this has to do with the concentration of shelters in this area, but rent burden continues to grow which leads to families doubling up, turning to the shelters, or the streets.

In the Bronx in 2017, 61.8% of residents were paying more than 30 percent of their household income towards rent, up from just under 60% in 2016, with 52.3% facing extreme rent burden by paying more than 35% of their household income, up from 49.9% in 2016.⁴⁷ In 2016, New York City had 51% of residents experiencing rent burden, 34% with a household income under \$35,000. New York State had 50% of residents experiencing rent burden, 36% with a household income under \$35,000.⁴⁸

Access to Social-Emotional Supports:

The Committee for Hispanic Children and Families signed-on to Advocates for Children’s FY18 recommendations for improving access and success for the rising number of students in temporary housing, citing research that shows that New York City students in temporary housing have worse educational outcomes than their permanently housed peers across a number of measures. Students in shelters have particularly concerning outcomes; the Institute for Children, Poverty, and Homelessness Atlas of Student Homelessness in New York City found that 53% of NYS students living in shelters were absent on 20 or more school days – the equivalent of one month of school. Additionally, 10% of middle and high school students living in shelters were suspended from school compared to 4% of housed middle schoolers and 4.6% of housed high schoolers.⁴⁹ Recognizing that youth who experience housing loss and housing insecurity are exposed to extreme stress, both within the circumstances that led homelessness and in being uprooted from the systems of support and care in their communities and schools – especially given that 50% of families are placed in

⁴⁶ Students Identified as Homeless 2017-2018. New York State Technical and Education Assistance Center for Homeless Students. <http://nysteachs.org/info-topic/statistics.html>

⁴⁷ American Fact Finder Selected Housing Characteristics 2017 1-Year Estimates (2018). U.S. Census Bureau American Community Survey. <https://www.census.gov/acs/www/data/data-tables-and-tools/american-factfinder/>

⁴⁸ Tenure by Housing Costs as a Percentage of Household Income in the Past 12 Months (2018). 2012-2016 American Community Survey 5-Year Estimates. U.S. Census Bureau American Fact Finder.

⁴⁹ On the Map: The Atlas of Student Homelessness in New York City (2017). Institute for Children, Poverty, and Homelessness. http://www.icphusa.org/new_york_city/map-atlas-student-homelessness-new-york-city-2017/

different boroughs and school districts when entering shelter⁵⁰ - we must ever look to the resources that are being offered to socially and emotionally support these youth both in the schools and in the shelters.

With the 50% increase of students in temporary housing in NYC during the past 5 years, the only increase in DOE staffing to serve this population was the addition of 43 Bridging the Gap social workers, who work with the 38,000 students living in shelter at schools with high numbers of these students, provide after-school literacy programs at shelters, and provide enrollment assistance for families living in shelters.⁵¹ This doesn't address the students who are in temporary housing outside of the shelter system - the other 67,000 students throughout New York City who were identified as homeless in 2017-18. While the Mayor and City Council did allocate and increase funds to continue and grow the Bridging the Gap (BtG) social workers available throughout the city, there are still schools and communities that may not hit the threshold to get one of the anticipated 69 BtG social workers (reflective of the 10 additional promised by the Mayor and the 16 funded through Council discretionary funds), but still have a significant number of students facing homelessness or housing insecurity that are not likely getting the full social and emotional supports that they deserve. For example, in one of the schools that CHCF serves, the percentage of students in temporary housing is 30% of the student body at the beginning of this school year – while 46 students were living in shelter nearly 263 students were living in doubled-up conditions. The school does not have a Bridging the Gap social worker connected to it, and in fact has only one counselor that must attend to student IEPs in addition to any other needs of the entire student body.

Academic Achievement of Homeless and Formerly Homeless Students

The Education Trust-NY and NYS Equity Coalition released a report in 2017 that looked at the achievement for students who are homeless or formerly homeless, with guidance for how to use the New York State ESSA plan as a tool for changing the trajectory for homeless student outcomes. The analysis of results from the 2015-16 state assessments in English language arts and math for students who were either homeless in the 2015-16 school year or at any time since kindergarten. The three findings reported were that (1) statewide, homeless students are half as likely to meet state proficiency standards compared to students who have never been homeless; (2) the proficiency rates for formerly homeless students are nearly the same levels as students who are currently homeless; (3) Students in temporary housing can and do achieve at high levels in NYS, with enormous variability in how schools are serving homeless and formerly homeless students.⁵²

⁵⁰ New York City Preliminary Fiscal 2018 Mayor's Management Report – Homeless Services.
https://www1.nyc.gov/assets/operations/downloads/pdf/pmmr2018/2018_pmmr.pdf

⁵¹ Recommendations for Improving School Access and Success for Rising Numbers of Students in Temporary Housing (2018). Advocates for Children. <http://www.advocatesforchildren.org/node/1212>

⁵² Improving Opportunity & Achievement for Students Experiencing Homelessness: Recommendations for New York State's Implementation of the Every Student Succeeds Act (ESSA) (2017). Education Trust-NY and the NYS Equity Coalition. <https://newyork.edtrust.org/press-release/homeless-formerly-homeless-students-new-york-half-likely-meet-state-academic-standards-peers/>

Students in Temporary Housing – Policy Priorities and Recommendations

| | Coalition Alignment | City |
|---|--|--|
| Social-Emotional Supports | Advocates for Children | <ul style="list-style-type: none"> Hire DOE Field Support Center Directors for Highly Mobile Students Base-line and expand the DOE Bridging the Gap social worker program to 100 social workers at schools Hire 50 DOE social workers to provide intensive supports at shelters to address education-related issues <p>AFC estimates the need for an additional \$20 million in new funding, beyond the \$10.3 million initially allocated for Bridging the Gap social workers in FY 2017</p> |
| | CHCF | NYC DOE should work with districts with students identified as homeless – including those living in shelter, in temporary housing, in doubled-up settings – to review the use of McKinney-Vento funds and ensure appropriate social-emotional supports for students going through housing insecurity and homelessness |
| | | State |
| Supporting Academic Achievement for Homeless Students and Formerly Homeless Students | Equity Coalition/Education Trust-NY | <ul style="list-style-type: none"> NYSED should disaggregate homeless student data and report academic outcomes for students in shelters, students who are doubled up, and unaccompanied youth to help schools properly target supports that are evidence-based NYSED should report at the school and district levels on outcomes for students who previously experienced homelessness NYSED should review districts' use of McKinney-Vento grants to identify best practices that can be shared and to review the effectiveness of programs currently being offered NYSED should ensure that school improvement plans under ESSA address the needs of students experiencing homelessness or who previously experienced homelessness Leverage the new chronic absenteeism and school discipline accountability indicators to address high rates of homeless student chronic absenteeism in their plans NYSED should monitor school districts and data for disproportionate discipline against any group of students, including homeless students |

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|--|-------------------------------|--|
| | | <ul style="list-style-type: none"> • Improve equity in high school course access and transition to postsecondary education • Improve access to early childhood education for students in temporary housing |
| | | City |
| | Advocates for Children | <ul style="list-style-type: none"> • As NYC DOE extends Pre-K and EarlyLearn, extend EarlyLearn eligibility to all children who are homeless • Develop universal protocols for identifying, enrolling, and serving children who are homeless • Provide training and technical assistance to Pre-K,3-K, and EarlyLearn program • Hire early childhood education liaisons to work at shelters <p>To see more about Advocates for Children’s recommendations in their testimony to NYC Council Committee on General Welfare here.</p> |
| | CHCF | Continue to develop the Family Child Care Field Support networks to engage home-based providers in connecting families experiencing housing instability to services |

Intersectional Issues – Protecting Immigrant Communities

Executive Summary:

The Committee for Hispanic Children and Families believes that education programs and schools do not exist in a vacuum, separate from the community in which they exist and serve. To ignore the climate that exists in the community and for specific groups, and the day-to-day experiences that families and children have leads to a catastrophic disservice of our vulnerable populations. With that, CHCF continues to acknowledge the intersectional impact of attacks being made against specific communities, groups, and populations.

CHCF recognizes that every child has a right to a free, public education in this country, regardless of ethnicity, immigration status, nation of origin, language spoken, where they live in the United States, or income level. We have entered a time of paralyzing fear and uncertainty that is impacting our families and children. Not only is the chill effecting the physical attendance of students at school out of fear that parents will be detained when dropping their children off or while their children are in school, but it is having a severe social-emotional impact on students and their families. The mere lack of a school climate that is welcoming, supportive, and protective of its children and families takes a devastating toll on our young people's ability to thrive in their education.

New York State and City have the ability to demonstrate true sanctuary for all of its residents, regardless of federal immigration status. These are our neighbors, our workers, our children. They deserve to have clear communication that New York State stands by all residents, that its agencies will support, defend and protect them to the full extent of the law. Where possible, the state should act to remove instances that create the threat of being detained, deported, and separated from family.

We believe that by advocating with and defending our communities in a holistic way, we support the stable foundation from which children and families can grow and thrive. Every resident and family of this state deserves to exist in a safe, stable, and supportive community and environment, regardless of race, ethnicity, nation of origin, immigration status, language spoken, or income level.

Protecting Students and Families

The 1982 Supreme Court Ruling in *Plyler v. Doe* found that [undocumented] immigrant children have just as much of a right to public education as their documented peers. Schools not only have the obligation of educating all children, regardless of race, ethnicity, country of origin, documentation status, and language spoken, they have an obligation to also create a space that allows children to grow and thrive. This means a space that is welcoming, inclusive, and free of fear and intimidation. A 2017 report released by Education Trust-NY, Advocates for Children, New York Immigration Coalition, and the Committee for Hispanic Children and Families recognizes the unique space that schools provide – they have the ability to allow all children to develop academically, social-emotionally, and civically. This is also a space that holds sensitive information about their students and families and should be expected to gather that information in a non-chilling manner and protect that information to the fullest extent.

The Safe Havens report gathered information from 25 school districts across New York State that serve 80% of all immigrant students in New York. While there are some indications of strong and supportive practices, there is clear variability in how each of the districts is serving its immigrant student and family populations. 8 of the 25 districts shared communications that demonstrate a commitment to ensuring that all students and their families are welcomed, regardless of immigration status or national origin, especially in response to recent anti-immigrant rhetoric and a pervasive climate of fear. When collecting information for student enrollment, none of the districts requested student social security numbers or explicitly asked for immigration status, however, 15 of the 25 districts ask questions on registration forms (rather than after enrollment) that can imply national origin. Additionally, some districts in requiring proof of residency request documents and forms of identification that can reveal immigration status. Regarding federal authorities' enforcement of immigration laws in schools, New York City has adopted the clearest protocols for school staff to follow if an ICE agent seeks to access a school; Rochester has also provided instructions to school employees if they receive any questions from ICE. No other school district provided such evidence to suggest existing policies or protocols specific to ICE.⁵⁴

Green Light New York

The Driver License Access and Privacy Act, a bill introduced by NYS Assembly member Marcos Crespo, would bring New York State in line with the 12 states, Washington D.C., and Puerto Rico that give all state residents access to driver's licenses, regardless of immigration status. New Yorkers were previously able to get a driver's license regardless of immigration status up until 2002 when Governor Pataki changed the law to require a social security number. The consequence of this action was to make the simple daily action of driving to the grocery store, work, or dropping one's children off at school a fear-inducing task for undocumented immigrants across New York State. Something as simple as a traffic stop for a broken taillight could place someone into deportation proceedings and lead to family separation. If the Driver License Access and Privacy Act were passed, it is estimated that 300,000 state residents would apply for a license.⁵⁵ Beyond the obvious benefits of increased annual (\$53 million) and one-time revenue (\$26 million) to the state for licensing, car purchases, registration, sales and gas tax, this policy would also

⁵⁴ Safe Havens: Protecting and Supporting New York State's Immigrant Students – A Statewide Call to Action (2017). The Education Trust-NY, Advocates for Children, New York Immigration Coalition, and The Committee for Hispanic Children and Families. <https://newyork.edtrust.org/press-release/safehavens/>

⁵⁵ Access to Driver's Licenses for All New Yorkers (2016). <file:///P:/luz-verde-fact-sheet-sep-8-2016-3-44-pm.pdf>

alleviate fear and demonstrate protection for some of New York’s most vulnerable residents, as well as increase safety on New York roads.^{56 57}

Public Charge

Early into the current administration, released policy priorities alerted advocates to an intended change to the Public Charge rule in the execution of immigration law. Public Charge is something that is applied specifically to individuals applying for status change to Legal Permanent Residency (LPR) and those applying for initial entry into the U.S. This rule does not apply to individuals applying for citizenship and those here in a temporary or protected status, such as refugees and asylees. Public Charge essentially assesses the likelihood of an individual becoming a public charge or relying on public funds and services. Under the current form of this rule, the only two factors considered to determine public charge are use of cash assistance and long-term medical issues with no private health-insurance.

In September of 2018, the Department of Homeland Security (DHS) released a public statement and official language, which will be released through the Federal Register for public comment in October of 2018. Based on language in the DHS-released version, the proposed rule change would expand the list of factors that could determine public charge to include other supports such as SNAP (supplemental nutrition assistance program), Medicaid and Section 8 Housing Assistance. There is still a consideration for including CHIP (child health insurance) in this expanded list. While DHS has said that they will not include the use of benefits by U.S. citizen children in determining public charge for parents applying for status change, child health is directly connected to parent health. The obvious concern arises that, if this rule were to change, families would begin to forgo use of social supports that sustain the health of all family members so as not to jeopardize status change of individuals intending to apply for status change. If parents are not accessing food, housing, and health care supports that are needed, *their children will be directly affected*. Additionally, the chill effect would be felt even by those immigrants to whom this rule does not apply. The consistent use of confusion and fear as a suppression tactic will apply with this rule – even when the rule hasn’t been officially changed, fear and misinformation have caused families to begin unenrolling in social programs.

Furthermore, this rule change would have system-wide impacts; on health alone, this policy change would impact access and utilization of health care, the public health risk, disparities based on race, gender and socioeconomic status, as well as the overall economy of localities. CHCF has been following the Center for Law and Social Policy (CLASP) and National Immigration Law Center (NILC) Protecting Immigrant Families Campaign as we wait for the rule to be submitted to the Office of Management and Budget (OMB) and opened to public comment. At this time the largest concern is misinformation being spread to add to the chill effect of this potential rule change. The PIF has shared estimates for anticipated impact of this rule change, specifically on citizen children with one or more immigrant parent.⁵⁸

⁵⁶ Immigrants and Driver’s Licenses in New York: Fact Sheet (2016). New York Immigration Campaign, Green Light NY Coalition. https://workerscenterdcny.files.wordpress.com/2016/06/factsheet_driverslicensesbilingual_april2016.pdf

⁵⁷ Ready, Set, Greenlight Campaign for Driver’s Licenses For All New Yorkers (2018). New York Immigration Coalition <https://www.nyic.org/2018/04/ready-set-greenlight-campaign-drivers-licenses-new-yorkers/>

⁵⁸ Protecting Immigrant Families Campaign resources. Center for Law and Social Policy (CLASP) and National Immigration Law Center (NILC). <https://protectingimmigrantfamilies.org/resources/>

Undocumented Immigrant Youth and Young Adults

New York is home to an estimated 817,000 undocumented immigrants as of 2014.⁵⁹ The specific group that is referred to as DREAMers fit the criteria set out by the federal DREAM Act – essentially youth and young adults who were brought into the United States as young children. These young people ultimately grew up in U.S. education and social systems and are citizens in every way except on paper. As a result, DREAMers are often denied access to education beyond the K-12 system and career opportunities. The Obama Administration introduced Deferred Action for Childhood Arrivals (DACA) in 2012, in an attempt to provide protection for this vulnerable population when Congress refused to act. DACA generally applied to the DREAMer population, providing a temporary renewable deferral of deportation and access to a social security number, which grants access to work and a driver's license. The Migration Policy Institute estimates that there are 76,000 undocumented New Yorkers that are eligible for DACA as of 2017. Between 2012 and 2018, just over 135,000 DACA initial and renewal applications have been approved for New York State residents.⁶⁰

In September 2017, the Trump Administration repealed DACA with a 6-month delay for Congress to pass a permanent legal pathway for DREAMers. However, the added conditions by the administration tying border wall funding, changing immigration law to eliminate family reunification immigration, and vetting practices for visa recipients to DREAMer legislation, which should address the path for DREAMers separate from the larger debate over the immigration system, has made an agreement difficult to move. Simultaneously, federal court rulings in San Francisco, Washington D.C., and Brooklyn have forced the federal government to resume accepting renewal applications for DACA recipients. While a recent case in a Federal Court in Texas denied an injunction to cease acceptance of DACA renewal applications, it is anticipated that this case will eventually make its way to the Supreme Court. With a shifting Supreme Court, the outcome for DREAMers remains uncertain as they are relying on the borrowed time of the courts to remain in status. CHCF continues to monitor the status of DACA to ensure rapid communication to our community members and connection to resources.

Even with DACA still available to current recipients, these youth and young adults are still ineligible for most financial aid for post-secondary education. This lack of support creates extremely difficult circumstances for DREAMers to pursue a college education. Without scholarships that cover part of the cost, DREAMers often find it difficult to attend school full time, especially if they need to work to pay for school. Attending school part-time extends out the time it takes to achieve a degree and attending full-time while maintaining necessary employment to pay school costs creates nearly impossible circumstances in which to commit the required energy to their education. Ultimately, without access to financial aid, these young people face significant barriers in completing post-secondary education.

⁵⁹ Warren, R. (2016). U.S. Undocumented Population Drops Below 11 Million in 2014, With Continued Declines in the Mexican Undocumented Population. Center for Migration Studies of New York. Journal of Migration and Human Security 4(1) p. 1-15. <http://jmhs.cmsny.org/index.php/jmhs/article/view/58>

⁶⁰ Consideration of Deferred Action for Childhood Arrivals by Fiscal Year (2018). U.S. Citizenship and Immigration Services. <https://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-form-i-821d-deferred-action-childhood-arrivals>

Protection Immigrant Families – Policy Priorities and Recommendations

| | Coalition Alignment | City | State |
|----------------------------------|---|---|-------|
| Protecting Students and Families | Education Trust-NY, Advocates for Children, New York Immigration Coalition | <p>Safe Havens:</p> <ol style="list-style-type: none"> 1. Ensure all students and their families are welcomed regardless of immigration status or national origin – i.e. (see citation for full report and recommendations) <ul style="list-style-type: none"> • SED should gather model curricula to promote tolerance and combat anti-immigrant rhetoric and bias to be shared state-wide • SED should provide a model for how school districts can establish a safe environment • SED should issue best practices for making public announcements in support of immigrant students and families • SED should issue best practices for districts to link families to resources and strengthen partnerships with community-based organizations 2. Handling collection, retention, storage, and release of information that includes students' and families' immigration status, place of birth, country of origin, years in U.S. schools, and U.S. entry date – i.e. (see full report below) <ul style="list-style-type: none"> • SED should reiterate the intent of the Commissioner's Regulation 100.2(y) that addresses protocol for gathering documents upon registration • SED should require school districts to provide training/information to staff on how to handle the collection, retention, and storage of information that includes sensitive immigration data and maintaining confidentiality 3. Responding to requests by federal authorities regarding enforcement of immigration laws – i.e. (see full report below) <ul style="list-style-type: none"> • SED should require all school districts to publicize and translate their protocols and criteria for evaluating ICE access 4. Support students and families when a parent, family member, or guardian is at risk of deportation or has been deported <ul style="list-style-type: none"> • SED should issue further guidelines reminding school districts of best practices such as social-emotional support, culturally and linguistically competent resources, Know Your Rights workshops, procedures if a parent is detained and no emergency contacts are available for school pick-up, updating emergency contact information, establishing policies that students and parents will not be referred to ICE with questions about immigration status, and providing accurate information around rumors about ICE activity | |

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| Green Light New York | Green Light Campaign | | Pass the “Driver’s License Access and Privacy Act” |
| Public Charge | Center for Law and Social Policy (CLASP) and National Immigration Law Center (NILC) | <p>CHCF commends the NYC MOIA on planning for the pending release of the public charge rule change including</p> <ul style="list-style-type: none"> • Developing public education campaign • Holding informational conversations with members of the health field and service organizations | <p>CHCF encourages New York State to develop an emergency action plan to respond to the anticipated chill effects of the Public Charge rule change, responding to</p> <ul style="list-style-type: none"> • Issues of misinformation • Identifying communities that might feel the impact of a decreased use of social benefits • Working with localities to determine means of supporting communities impacted by potential rule change |
| Undocumented Youth and Young | CHCF/Hispanic Federation | | <p>Pass the New York State Dream Act.</p> <p>NYS Excelsior Scholarship and Part-Time Scholarship (PTS) should be extended to New York residents, regardless of immigration status.</p> |