

Testimony of NYC Public Schools on Language access Before the NYC Council Committee on Education

September 30, 2025

Testimony of Dr. Cristina Meléndez, Deputy Chancellor for the Division of Family, Community, and Student Empowerment

Good afternoon, Chair Joseph and members of the City Council Committee on Education. My name is Dr. Cristina Meléndez, and I serve as the Deputy Chancellor for the Division of Family, Community, and Student Empowerment. I am joined by Kleber Palma, Executive Director of the Office of Language Access, or OLA; Kyle McDonald, Executive Director of Data and Policy for the Office of Multilingual Learners; and colleagues from New York City Public Schools. Thank you for the opportunity to join this important conversation and to highlight the progress and impact of New York City Public Schools' language access efforts. We are proud to celebrate this work and its role in strengthening connections with families across our city.

As you know, family engagement and empowerment is at the heart of what we do at New York City Public Schools, and true partnerships with families are not possible without language access. In a school system encompassing more than 180 different languages, with approximately 38 percent of households speaking a language other than English, OLA has been spearheading this work for over two decades by creating the infrastructure needed to communicate and engage families who communicate in a language other than English.

As part of this work OLA processes requests from schools and offices for written translation services, on-site and virtual interpreters, and over-the-phone interpretation services. OLA also distributes language access kits to all schools each year, which includes multilingual posters and guides to help school staff assist parents with limited English proficiency. OLA monitors the implementation and effectiveness of language access services to ensure that we are communicating effectively with our families.

Under this Administration, OLA continues to address critical priorities, including supporting new and emerging languages, ensuring the safe and appropriate use of translation technologies to engage families, and establishing partnerships with elected officials and community stakeholders to advance language access. The City Council has been a true partner in this work and I would like to thank you for your longstanding commitment and leadership on this issue.

Expansion of Language Access Initiatives

Our most recent major accomplishment occurred just a few months ago, in June of 2025, when our Chancellor's Regulation A-663 was amended. That regulation establishes our policy and procedures for ensuring that parents who communicate in a language other than English are provided with a meaningful opportunity to participate in and have access to programs and services critical to their child's education.

Among its key provisions, the amended regulation expands the New York City Public Schools' covered languages from nine to twelve, formally establishes a Language Access Coordinator at each school, strengthens guidance for school-based Language Translation and Interpretation Plans, and requires language access training for school staff. With the addition of the three new covered languages—Albanian, Ukrainian and Uzbek—New York City Public Schools now proactively translates general communications for nearly 99 percent of our families.

Chancellor's Regulation A-663 also now aligns with Local Law 115/2024, requiring distribution of information regarding interpretation and translation services to families. Our most recent instructions to principals to distribute our multilingual "Get Help in Your Language" notice to families took place early this month, during the week of September 8th.

Our approach to language access has always been multifaceted. It is based on the premise that language access requires both the creation of support systems and the provision of services that are ultimately the responsibility of all, not just a few. A critical component of this work is raising awareness and ensuring that language access remains a priority for both school staff and families. In the recently concluded school year, 98 percent of our schools had a designated Language Access Coordinator, with 90 percent of those coordinators completing the required training. Language Access Coordinators play a vital role in supporting the schools' language assistance services, ensuring families receive communications in their preferred language.

Additionally, in the spring of 2025, New York City Public Schools rolled out mandatory language access training for Principals and Parent Coordinators for the first time, resulting in 2,423 staff completing the online asynchronous training. This fall, the mandatory training will be expanded to include all parent-facing school-based staff. The training is designed to equip staff with essential tools to effectively engage parents who prefer to communicate in a language other than English. This means having multilingual signage in place at school entry ways, as well as access to translations of critical communications and interpretation services.

Engaging Multilingual Families

One main component of our work focuses on disseminating information about New York City Public Schools' language assistance services to families through a variety of channels, including family events and trainings, backpacked notices, emails, text messages, robocalls, mailers, our website and social media. Thanks to the City Council's generous language access investment, we also launched an annual citywide public awareness campaign to further amplify our message to families, including print and digital ads, digital displays, and radio spots.

The second component of our approach is creating an enduring yet flexible language access support system for our schools. At the core of this support is OLA, with an approximate budget of \$12 million and 90 positions. Over the past few years, OLA has developed workstreams that extend beyond its traditional translation and interpretation functions, including community partnerships, compliance, language data metrics, and usage evaluation, to name a few. One

particularly notable initiative rooted in this evolution of OLA is new partnerships with community-based organizations to reach hard-to-engage communities. Another key initiative is the development of data dashboards that allow us to monitor language access performance at a school, district, and citywide levels. Other language access support mechanisms include online archives of translated materials and templates, monthly newsletters for schools with updates and best practices, and an annual school allocation of \$7 million to help schools address local language needs. The City Council has been instrumental in all those investments.

Lastly, our third component is the provision of direct language assistance services to families. Last school year, New York City Public Schools provided interpretation for over 422,000 phone calls with families and provided professional interpreters to more than 6,500 family meetings. OLA also facilitated translation of over 1,400 general communications, 15,000 IEPs, and 1,500 foreign transcripts into English for student placement. These numbers do not include the countless daily family interactions facilitated by our school-based bilingual staff.

Language Access for the Deaf and Hard of Hearing

The Office of Sign Language Interpreting Services (OSLIS) is a key partner in language access for the NYCPS school community. OSLIS provides interpreting services between American Sign Language (ASL) and English for families and caregivers, staff, students, and other stakeholders throughout NYCPS. Their purpose is to promote cross-cultural communication among deaf and hard of hearing members of the NYCPS community, while fostering inclusivity and communication access for the ASL signing community in their schools and workplaces.

In addition to interpreting services, the office also provides screening and mentoring for agency interpreters working in the classroom, ASL observations of deaf and hard of hearing children in the system, and assistance with outreach to parent coordinators, principals, schools and other departments within NYCPS. We are also proud that P.S. 347, The American Sign Language & English Lower School, is a Dual Language PreK-to-8 public school in NYC serving d/Deaf, hard-of-hearing, children of deaf adults, and hearing students.

Advancing Multilingual Education

In addition to fulfilling families' rights to language access, we are equally committed to advancing students' rights to multilingual education. Our Office of Multilingual Learners partners with district- and school-based teams to ensure the timely identification of English Language Learners, improve record-keeping, and fulfill bilingual staffing needs. These ongoing priorities of our system's work are part of a broader effort to provide every child with access to high quality instruction in a welcoming and inclusive environment. For multilingual learners, this includes our initiatives to strengthen bilingual program quality and sustainability, increase the availability of curricula and materials in students' home languages, and equip all teachers to serve ELLs effectively.

Just as importantly, we are focused on making sure that students' abilities to speak multiple languages translate into tangible academic and career benefits, such as paid work-based learning experiences and college credits. To deepen this work, NYCPS launched the Advisory Council to Boldly Reimagine Multilingual Education to integrate community perspectives in shaping priorities. In alignment to NYC Reads and our commitment to family empowerment, this school year we are piloting two English Language development curricula - HMH English 3D and National Geographic: Reach Higher, to ensure the needs of our English Language Learners are met. For Year 1 implementation, the pilot will impact approximately 9,000 English Language Learners. While there are long-standing challenges, historic investments by this administration and the Council have driven real progress: an 8.7-point decrease in dropout rates for Current ELLs over five years and a 29 percent increase in students graduating with the Seal of Biliteracy between August 2024 and August 2025.

Conclusion

While we have made significant progress, our work is far from complete. We need to leverage translation technologies to supplement current services. We are currently exploring translation tools that will allow families and staff to communicate on smart devices in a responsible manner without compromising privacy concerns. We need to promote and celebrate our three new New York City Public Schools' languages through multicultural events. And we need to look beyond our borders, to other multilingual societies with longstanding expertise in this area to learn more. To this end, New York City Public Schools is prepared to enter the next era of language access and looks forward to continuing its collaboration with the City Council to support our multilingual families.

Lastly, I would like to turn to the legislation. Intro 1336 would require New York City Public Schools, in collaboration with The Department of Mental Health and Hygiene (The Health Department) through the joint office of School Health, to distribute information about the importance of dental care. We support the collaboration allowing all students and families to receive oral health education, ensuring consistent and efficient use of public health expertise. Intro 1337 would require the distribution of information on vaccines to parents of all students, in collaboration with the Health Department also through the Office of School Health. We are also in support of that legislation. The Office of School Health currently develops and shares immunization information on requirements, guidance, and resources with families, and support efforts to continue to do so. We look forward to working with the Council on how we identify the best methods for distributing important information to families to best support their health.

Thank you to the Council for the opportunity to speak today. I look forward to your questions.



August 22, 2025

Maura Hayes - Chaffe
Deputy Comptroller for Audit
The City of New York
Office of the Comptroller
One Centre Street
New York, NY 10007-2341

**RE: Draft Audit Report on the Department of
Education's Compliance with Regulations
Regarding English Language Learners
(SR23-057A)**

Dear Ms. Hayes-Chaffe:

This letter constitutes the New York City Public School's (NYCPS)/Department of Education's (DOE) formal response to the New York City Comptroller's (Comptroller) draft audit report, covering school years 2022-23, 2023-24, and 2024-25, on the *Department of Education's Compliance with Regulations Regarding English Language Learners* (Report).

The DOE is committed to empowering families and communities and meeting the needs of Multilingual Learners (MLs) and English Language Learners (ELLs) attending NYC Public Schools. This includes adherence to federal, state, and local regulations such as NYS Commissioner's Regulation Part 154 (CR Part 154) and the Aspira Consent Decree regarding ELL identification, placement, notifications in families' preferred languages, and mandated services.

In 2024, the DOE affirmed its commitment to improving educational outcomes for multilingual learners and students with disabilities with the creation of the Division of Inclusive and Accessible Learning (DIAL).

Since this onset of this audit, DOE has:

- Opened 103 new bilingual education programs in three years.
- Enrolled 13,758 additional English Language Learners than three years ago.
- Improved policy metrics to be more actionable and strengthen connections between compliance and academic achievement.
- Launched the Chancellor's advisory council to boldly reimagine multilingual education in December 2024 to provide every student with a pathway to multilingualism from preschool to graduation with equitable access for ELLs.

- Awarded 1,275 students with the NYS Seal of Biliteracy¹ upon graduation in spring 2025.

DIAL is committed to ensuring that multilingual learners receive the resources and opportunities necessary to reach their full potential. By honoring and incorporating students' diverse cultural backgrounds, the DOE creates inclusive classrooms where every learner feels valued and understood.

Changes in New York City's ELL Demographics from 2022 to Present

Both historic global and national crises have impacted NYC in recent years. In 2022, DOE transitioned fully back to in-person instruction after the global COVID-19 pandemic — a period during which “the families of English learners experienced disproportionate distress” (Council of Great City Schools, 2020). That same year, the nation saw historic increases in migration, with New York City receiving a substantial number of asylum seekers between spring 2022 and December 2024.² This influx significantly impacted the DOE, particularly in the enrollment and support of multilingual learners.

Between school years 2022-23 and 2023-24, the DOE saw an increase of 13,758 ELLs, bringing the total to 174,014 ELLs. Of these, 121,336 were newcomers—students with 0–3 years of ELL services—representing nearly 70% of the total ELL population. Additionally, 1,533 ELLs were identified as Students with Interrupted Formal Education (SIFE).

Demographics within this population have shifted rapidly across the city, with many students living in temporary housing, and having to transfer to different schools due to shelter policies that affected duration of stay. As a result, numerous school communities which had not historically served large numbers of ELLs welcomed these students. In response, the DOE implemented targeted support, professional learning opportunities, and policy protocols to ensure accurate identification and placement of ELLs.

The following sections highlight systemic improvements and measurable gains aligned with recommendations from the Report.

New York City DOE's Ongoing Improvements in Policy Compliance

Increase in ELLs Receiving English as a New Language (ENL) Instruction

Beginning in the 2019-20 school year, the DOE enhanced its ENL compliance metrics to more accurately ensure that ELLs receive services aligned with the requirements of CR Part 154. The revised framework introduces five layers of ENL compliance, each designed to strengthen

¹ The NYS Seal of Biliteracy is an award bestowed by the NYS Commissioner of Education upon high school graduates who have met the requirements to earn a Regents Diploma and who can demonstrate an advance proficiency in English and one or more other world languages.

² Rafee, A. (2025, April 29). Migrant Influx Helps Curb New York's K-12 Enrollment Decline. [new-yorkers-in-need-homelessness-nys.pdf](#)

accountability and instructional quality. These five layers allow DOE to monitor whether students receive at least the minimum mandated number of minutes and type of ENL instruction, and that at least some instruction is provided by an appropriately certified teacher. When these rules were initially implemented in the 2019-2020 school year, only 68% of ELLs were fully served in ENL; this has increased to 93% of ELLs in the 2024-25 school year.

Increase in ELLs Receiving Bilingual Education

The DOE remains committed to expanding and sustaining high-quality bilingual education programs, including Transitional Bilingual Education (TBE) and Dual Language Bilingual Education (DLBE). As of the 2024–25 school year, the DOE offers 566 bilingual programs citywide, with 103 new programs launched between 2022 and 2024. These include programs in Spanish and Chinese, as well as in low-incidence languages such as Arabic, American Sign Language (ASL), Bengali (Bangla), and Albanian.

Between the 2022–23 and 2024–25 school years, the number of ELLs served in bilingual education programs increased from 30,329 to 31,469, reflecting an increase of 1,140 students. To strengthen program accountability, in spring 2024, the DOE began training borough ML/ELL Directors and ELL Compliance and Performance Specialists (ELL CPS) on newly developed data tools to track CR Part 154 compliance for bilingual education. Like the ENL compliance metrics, the bilingual compliance framework includes multi-layered rules that the DOE is currently evaluating and refining.

Increased Recruitment of Bilingual Education and ENL Teachers

As of March 2025, DOE has hired over 550 new educators in bilingual education, bilingual special education, and ENL through targeted strategies that strengthen the DOE’s pipeline and support current educators in earning bilingual certifications.

Key initiatives include:

- Hiring stipends and dedicated teacher recruiters for traditional candidates.
- Alternate certification pathways such as NYC Teaching Fellows, EdPrep NYC and extended certification programs.
- Retention programs include professional development, mentorship, and the Emerging Teacher Leadership Program.
- Incentives for current teachers to change their city license to bilingual, bilingual special education, or ENL.

To build on this progress, the DOE continues to implement a range of recruitment, incentive, and certification initiatives aimed at expanding access to high-quality bilingual instruction across the city.

NYC Comptroller's Findings Omit Important Considerations

Analysis of Low-Incidence Bilingual Program Waivers Submissions

NYSED requires districts to submit low-incidence language waivers (for languages other than Spanish and Chinese) based on enrollment of ELLs. However, waiver submissions do not account for parents' ELL program preference (whether parents want their child to be placed in a bilingual program or ENL only program). DOE engages superintendents around the low-incidence language waivers submitted for districts, however, since waivers do not account for demand of bilingual programs in those districts, relying on waiver submissions alone overstates the demand for bilingual programs in low-incidence languages.

ELLs Are Placed in Appropriate Programs Per NYS CR Part 154

As stated in the Report, "CR Part 154 states that every school district must provide ELLs with either a Bilingual Education or ENL Program". The DOE makes every effort to honor the parent/guardian's ELL program preference. As required by CR part 154:

- DOE captures the parent's ELL program preference from the ELL Parent Survey and Program Agreement form to maintain a record of the parent or guardian's initial program selection.
- In cases where the parent prefers a bilingual program and there are no bilingual programs at a student's current school, DOE has systems in place to offer families the option of pursuing a bilingual program transfer or including the student in a bilingual program wait list. This information is clearly outlined for families in the "Parent Agreement" section of the ELL Parent Survey and Program Agreement form, where families indicate that "they understand that this school currently does not have a bilingual program, and their child will receive ENL at the school" and then indicate whether they would like to pursue a transfer or be added to a bilingual list maintained by the school.
- When no bilingual education program is available, or parents decline a transfer to a school with a bilingual program, DOE places students into an ENL only program, which every DOE school have at a minimum.

In the Report, the auditors highlight seven instances where parents requested transfers to a school with a bilingual program, but students remained in ENL programs. To make this determination, auditors reviewed whether families indicated they were interested in a transfer to a bilingual program on the ELL Parent Survey and Program Agreement form. However, the auditors did not consider the form in its entirety, as two parents clearly indicated on the forms that they wanted their child placed in an ENL program, and one student's form indicated a provisional placement in Transitional Bilingual Education; this student's placement letter also indicated placement in a bilingual education program.

DOE Regularly Monitors Policy Compliance of All Schools

The Comptroller's statement that "DOE's monitoring tools are ineffective" (page 9) is an overgeneralization based on a limited review of one monitoring tool—the annual ML/ELL School Support Survey. This survey is designed to identify and provide targeted support to a subset of schools selected using approximately 32 indicators, many of which reflect higher levels of need for policy and compliance assistance. It is not intended to represent the effectiveness of DOE's overall monitoring framework.

The annual policy monitoring visits referenced in the report are only one component of DOE's multi-layered monitoring system and are not the primary mechanism for ensuring compliance. The audit methodology did not account for other critical tools that drive improved compliance across all schools, such as the monthly ELL Data Update Report (EDUR) and DOE's dashboards, which are updated daily and enable district staff to monitor programming and intervene as needed. These tools, combined with ongoing support and oversight, provide a comprehensive approach to ensuring that English Language Learners receive mandated services.

Auditors Cited Ineligible Students in Findings

Student Sample

The auditors selected a sample of three hundred eighty-three students to test compliance with the requirements of CR Part 154, including whether schools maintained required ELL documentation, whether students were placed in the correct ELL program and received the required units of study by an appropriately certified teacher. Of these sample students, forty students were determined not to have language acquisition needs and therefore are not ELLs. However, these students were included as part of the auditors' findings below but should have been excluded as the requirements of CR Part 154 would only apply to ELLs. For example:

- **Missing or Incomplete Parent Survey:** Eighteen students who the auditors identified as missing or having an incomplete Parent Survey should be excluded from the analysis as they were determined to not have language acquisition needs and were not ELLs.
- **Students not Placed in Correct Program:** One student should be removed from this analysis as the student was determined not to have language acquisition needs and was not an ELL.
- **Not Receiving Required Courses of Enough Minutes:** Nine students should be excluded from this analysis as they were determined not to have language acquisition needs and were not ELLs.
- **Not Served by Certified Teachers:** Three students should be excluded from this analysis as they were determined not to have language acquisition needs and were not ELLs.

Entire Student Population

The auditors also conducted an analysis of the larger student population based on ATS records. While the auditors properly excluded students who were determined not to have language acquisition needs from the NYSITELL findings, the auditors did not exclude these same students from the Spanish LAB related findings. Specifically,

- **Spanish LAB:** Fifty-seven students identified by the auditors as not administered the Spanish LAB were not eligible for the Spanish LAB administered since they were determined to not have language acquisition needs and were not ELLs. Similarly, thirty-four of these students should also be excluded from the analysis of Spanish LAB timeliness for the same reason cited above.

Determination of Eligibility for ELL Identification and Timeliness for ELL Assessments Requires Analysis Beyond Available Source Systems

As part of this audit, the Comptroller originally requested information on “All students who newly enrolled on or after July 2022, and all reentry students who were outside the NYS system for more than two years.” DOE’s data systems do not have a single indicator that captures newly enrolled students or reentry students who were outside the NYS system for more than two years. DOE provided source data from the Automate the School (ATS) system that would enable auditors to conduct independent tests. However, when DOE conducts its own end-of-year reporting, it references multiple data sources and applies business rules that cannot be replicated from the ATS biographic data table (BIOG). Therefore, the auditors could not review all the items DOE typically checks for when producing final reporting. As a result, the auditors findings include many students who may not have been eligible for the ELL identification process in school year 2022-23, since they may not have been newly enrolled, reentry, or been enrolled at a DOE school for 10 school days or 20 school days, for incoming students with an Individualized Education Program (IEP).

After the exit conference, DOE was provided with an opportunity to provide supporting evidence of students who may not have been eligible for the ELL identification process. As part of this draft report, DOE conducted additional analysis and submitted additional data, including the number of days students were enrolled in the 2022-23 school year.

- 1,396 students without an IEP were enrolled for less than ten school days in the 2022-23 school year, the timeline required for the ELL identification process to be completed, including completion of the Home Language Identification Survey, NYSITELL and Spanish LAB administration.
- 78 students with an IEP were enrolled for less than 20 school days in the 2022-23 school year, the timeline required for the ELL identification process to be completed, including completion of the Home Language Identification Survey, NYSITELL and Spanish LAB administration.

- Following an analysis of prior enrollment, the DOE was also able to identify 1,241 students who were neither newly enrolled nor reentry students and therefore ineligible for the ELL identification process.

Although the DOE agrees timely identification of all ELLs is critical, such errors in methodology should be addressed in any follow-up by NYC Comptroller's Office.

NYC DOE Responses to Recommendations

Recommendation 1. *Finalize rules for implementing a tracking and monitoring system for Bilingual Education and English as a New Language Programs to ensure students are being adequately served.*

Response. The DOE agrees with this recommendation as it aligns with the DOE's current practices and ongoing initiatives.

- **English as a New Language (ENL) programming compliance:** Since the rollout of the five layers of ENL programming compliance in the 2019-20 school year, DOE continues to enhance the associated business rules and integrate them into DOE systems and reporting tools. These include ENL STARS Action items, dashboards, and monthly school-level ELL Data Update Reports (EDURs).
- **Bilingual Education Compliance:** Since Spring 2024, the DOE continues to develop and evaluate bilingual programming compliance rules that align to CR Part 154.

Recommendation 2. *Implement and further develop a system to monitor ENL units of study to ensure that students are receiving all required ENL minutes by a certified ENL teacher, in compliance with CR-Part 154.*

Response. The DOE agrees with the recommendation to further improve the monitoring of ENL programming compliance. As mentioned above, the DOE is already planning to enhance systems to ensure students are fully served.

Recommendation 3. *Continue their efforts to recruit more qualified teachers for English Language Learners program classes and encourage current DOE personnel to obtain the required certifications to become ELL certified educators.*

Response. DOE agrees with this recommendation as it aligns with DOE's current efforts and ongoing initiatives, including key hiring pipeline initiatives below:

- **Grow Your Own Programs**
 - **Bilingual Pupil Services Program:** Supports paraprofessionals in becoming bilingual and ENL teachers. It was expanded in 2024, with nine additional interns

added, for a total of 50 participants, seven of whom will graduate by June.

- EdPrep NYC: Supporting current DOE employees (e.g., paraprofessionals, family workers, and substitute teachers) in obtaining bilingual special education and ENL certifications.
- Extended Certification Programs:
 - The Office of Teacher Recruitment and Quality used the funding from the Office of Multilingual Learners to pay tuition for 59 current DOE teachers to complete coursework to earn their bilingual extension.
 - Partnerships with CUNY and NYSED enable teachers to earn dual certifications in bilingual education and special education.
- Two Memorandums of Understanding (MOUs) signed between the DOE and the United Federation of Teachers (UFT) to allow bilingual and ENL-certified teachers to switch licenses without probation.
- New Teacher Recruitment and Incentives
 - Traditional Candidate Pool: Partnerships with local education schools, virtual recruitment events, and utilize advertising to attract bilingual teachers in high-demand languages, including Arabic, Bengali (Bangla), Haitian Creole, Mandarin, Russian, and Spanish.
 - NYC Teaching Fellows: Enrolling 1,000 teachers to start teaching in fall 2025, including those pursuing bilingual special education and ENL certifications.
 - Financial Incentives for Early Commitment: Traditionally certified candidates committing early to teach in high-need areas, including bilingual education, ENL, and bilingual special education—receive a hiring stipend.

Recommendation 4. *Develop a centralized system for tracking teachers Continuing Teacher and Leader Education (CTLE) hours, to ensure that they are receiving the minimum 50% of required professional development hours, as outlined in CR Part 154. Additionally, DOE should designate a team to monitor CTLE compliance and provide periodic status reports.*

Response. DOE disagrees with this recommendation as NYC DOE fully complies with NYS Commissioner’s Regulation (CR) Part 154-2(k), requirement that “each school district shall provide professional development to all teachers and administrators that specifically addresses the needs of English Language Learners.” Evidence of DOE’s provision of adequate professional learning opportunities on language acquisition is now required to be provided to NYSED by each community district superintendent as part of the Comprehensive ELL Education Plan, beginning with the 2024-25 school year. To renew their certification, CTLE certificate holders certify they met the requirements, and are required to maintain a record of completed CTLE and provide

records to NYSED for review upon request. NYC DOE reviews teachers' certifications to be current and valid.

Recommendation 5. *Continue to conduct regular audits and inspections during Policy Monitoring Visits to ensure that all required school level ELL-critical documentation is completed, retained in students' cumulative records, and accurately entered in ATS.*

Response. The DOE agrees with this recommendation and has been exploring ways to collect digital copies of documents in a new student information system that is currently in development.

Recommendation 6. *Improve oversight of waiver requests, evaluate recruitment efforts, and expand bilingual programs in high-demand districts to reduce reliance on waivers and ensure ELL students receive appropriate language services.*

Response. The DOE agrees with these recommendations as it aligns with our current practices and ongoing initiatives.

- **Oversight of low incidence language program waiver requests:** Beginning in the 2018-19 school year, the DOE central office began to submit low-incidence language waivers to NYSED on behalf of districts³. Beginning in 2021, DOE began providing superintendents with annual bilingual program summaries which highlight the need for low-incidence bilingual programs in their district. Since the 2024-25 school year, DOE supports superintendents with information on low-incidence language waivers to report on their districts' NYS Commissioner Regulation Part 154 Comprehensive ELL Education Plan (CEEP).
- **Expand bilingual programs in high demand districts:** Since 2019, the DOE engages superintendents regarding bilingual programs in their districts and provides an annual bilingual program summary that outlines the state of current bilingual programs in each district and opportunities to open new programs.
- **Evaluate Recruitment efforts:** The DOE currently tracks engagement with recruitment materials, applications submitted, and the outcomes of staffing annually.

Recommendation 7. *Implement standardized procedures to ensure that all schools provide complete and accurate ELL program information to parents/guardians in Parent Survey and Program Agreement Forms.*

Response. The DOE agrees with this recommendation as it aligns with our current practices. The DOE is currently in the process of reviewing and revising the ELL Parent Survey and Program Agreement form. In July 2023, DOE previously revised this form to include:

³ NYS Commissioner's Regulation Part 154 allows schools submit waivers for bilingual education programs in low-incidence languages other than Spanish and Chinese.

- A link to NYSED’s ELL parent orientation video⁴ to ensure families have access to information about all ELL programs, regardless of whether they are available at the student’s current school.
- A checkbox that allows school staff to clearly indicate when there is no bilingual program in the district that meets the grade and home language requirements for the student, and
- School certification section with a checklist to ensure the DOE honors the requests made by parents/guardians to the extent possible.

Additionally, all DOE schools outline their plan on how they will provide the mandated ELL parent orientation as part of their annual Language Allocation Policy.

Recommendation 8. *Establish a centralized process to collect, analyze, and act on data from the Parent Survey and Program Agreement Forms across all schools.*

Response. The DOE agrees with the recommendation as it aligns with our current practices. All schools are required to collect and enter the following information from the ELL Parent Survey and Program Agreement form in ATS:

- Whether the parent did not return the ELL Parent Survey (parent option defaults to bilingual education), and
- Whether school staff provided parents an orientation or parents did not attend the orientation.
- Changes to the parent’s program preference.

This data informs DOE reporting and allows district and school staff to analyze and monitor parent/guardian’s preference and whether mandated parent orientations have been provided as required. Examples of DOE reporting include:

- **ATS Fair Student Funding ELL Report (RFSF)** - lists all current ELLs at a school and their program option.
- **ELL Bilingual Program Transfer Requests (ELTR)** - list all the students at a school who are eligible for a bilingual program transfer.
- **Monthly ELL Data Update Reports (EDURs)** - provide schools with a list of students for whom they must update parent preference information in ATS.
- **Dashboards and annual bilingual program summaries** - allow central and district staff to analyze ELL program selection and demand for bilingual programs citywide.

⁴ <https://www.nysed.gov/bilingual-ed/parent-orientation-video-english-language-learner-ell-programs-new-york-state>

The DOE selects schools with low compliance entering these data points for the annual monitoring visits.

Recommendation 9. *Develop and implement a centralized tracking system for waitlists and transfer requests in ATS and enhance oversight to ensure all bilingual program preferences are honored timely.*

Response. The DOE agrees with the recommendation as it aligns with our current practices and existing data systems.

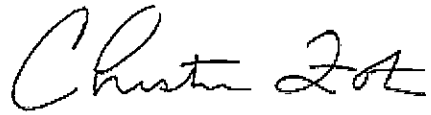
- **Centralized System for Bilingual Program Transfers:** The ELTR screen allows the DOE to initiate and centrally track transfer requests; this ELTR screen was implemented in the 2020-21 school year and (i) includes a list of all students with a bilingual program preference that are eligible for a bilingual program transfer, (ii) allows principals to submit a transfer request and indicate the parent's preferences for distance, (iii) allows principals to update the outcome of the transfer request, and (iv) generates daily reports of all the bilingual program transfer requests submitted citywide, and the latest status of each request. In Fall 2024, OML transferred the review and authorization of bilingual education program transfers to local superintendents' ML/ELL staff to expand the capacity to support families and schools. OML continues to support district ML/ELL staff with this process and has a centralized system to collect transfer information from district ML/ELL staff.
- **Centralized system for Bilingual Program Waiting Lists:** DOE has revised its guidance to schools in July 2025 to clearly identify the fields that must be included as part of the bilingual program waitlist. DOE is currently exploring the existing ATS ELL Fair Student Funding Report (RFSF) report as a centralized waitlist for individual schools and how to further standardize and improve oversight over this process.

Recommendation 10. *Implement a school level monitoring system to ensure that the ELL identification process is being completed in accordance with their Policy and Reference Guide and CR Part 154.*

Response. The DOE agrees with this recommendation as it aligns with current practices and ongoing initiatives. All schools complete an annual Language Allocation Policy and outline their plan for completing the ELL identification process aligned to CR Part 154. DOE also provides all schools with monthly EDURs to help schools monitor and meet the requirements of the ELL identification process. The report provides schools with a list of students that are out of compliance and schools must address.

As presented in this response, the DOE is committed to continuously monitoring and planning for the improvement of the key data metrics in service of the city's multilingual learners. The DOE understands that the implementation of city, state, and federal mandates as they pertain to serving the city's multilingual learners are a critical lever towards achieving an equitable education for every multilingual learner in NYC.

Sincerely,

A handwritten signature in black ink, appearing to read "Christina Foti". The script is fluid and cursive, with the first name "Christina" written in a larger, more prominent hand than the last name "Foti".

Christina Foti
Deputy Chancellor, Division of Inclusive and Accessible Learning

Parents: NYC Public Schools Speak Your Language

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학부모: 뉴욕시 공립학교는 여러분의 언어를 구사합니다

[Korean]

모든 뉴욕시 공립학교는 영어 이외 언어로 의사소통을 선호하시는 가정을 대상으로 무료 통역 및 번역 서비스를 제공합니다. 학부모-교사 컨퍼런스 시간과 같은 상황에 도움이 필요하시거나 여러분의 학생을 위한 특수교육 서비스를 찾으시려면, 학교의 교장 또는 학부모 코디네이터에게 연락하십시오. 또한 추가적인 언어 지원 리소스를 찾거나 의견 제공 또는 질문이나 불만을 제기하시려면 schools.nyc.gov/hello를 방문해 보십시오.

Родители, муниципальные школы Нью-Йорка говорят на вашем языке

[Russian]

Все муниципальные школы Нью-Йорка предоставляют бесплатные услуги устного и письменного перевода семьям, предпочитающим общение на языках помимо английского. За языковой поддержкой, к примеру, при планировании встреч родителей с учителями или организации услуг специального образования для учащегося, обращайтесь к директору школы или координатору по работе с родителями. Посетите страницу schools.nyc.gov/hello, чтобы получить дополнительные ресурсы языковой поддержки, оставить отзыв, запрос или жалобу.

Padres: las escuelas públicas de la Ciudad de Nueva York hablan su idioma

[Spanish]

Todas las escuelas públicas de la Ciudad de Nueva York ofrecen servicios gratuitos de traducción e interpretación para las familias que prefieren comunicarse en un idioma distinto del inglés. Si necesita ayuda, bien sea para una reunión de padres y maestros o para obtener servicios de educación especial para el estudiante, hable con el director o el coordinador de padres de su escuela. También puede ingresar a schools.nyc.gov/hello para acceder a recursos adicionales de ayuda lingüística, para dar su opinión o para presentar inquietudes o quejas.

Батьки: Безкоштовні школи міста Нью-Йорк розмовляють вашою мовою

[Ukrainian]

Усі безкоштовні школи міста Нью-Йорк надають безкоштовні послуги усного та письмового перекладу сім'ям, які воліють спілкуватися мовою, відмінною від англійської. Якщо вам потрібна допомога, наприклад, під час батьківських зборів або для отримання послуг спеціальної освіти для вашої дитини, зверніться до директора школи або координатора по роботі з батьками. Також можна відвідати веб-сайт schools.nyc.gov/hello для отримання додаткових мовних ресурсів, щоб залишити відгук, запит або скаргу.

[Urdu]

والدین: این وائی سی پبلک اسکول آپکی زبان بولتے ہیں

تمام این وائی سی پبلک اسکول انگریزی کے علاوہ کسی اور زبان میں ابلاغ کو ترجیح دینے والے خاندانوں کے لیے بلامعاوضہ ترجمہ اور ترجمانی کی خدمات فراہم کرتے ہیں۔ اگر آپکو مدد درکار ہے، جیسے والدین اساتذہ کانفرنس کے دوران یا اپنے طالب علم کے لیے خاص تعلیمی خدمات حاصل کرنے کے لیے، اپنے اسکول کے پرنسپل یا والدین رابطہ کار سے رابطہ کریں۔ آپ اضافی لسانی مدد کے وسائل کے لیے، اپنے تبصرات فراہم کرنے، یا استفسارات یا شکایت درج کروانے کے لیے schools.nyc.gov/hello پر بھی جا سکتے ہیں۔

Ota-ona: NYC Davlat Maktablari Sizning tilingizda gapiradi

[Uzbek]

Barcha NYC public schools (NYC davlat maktablari) ingliz tilidan boshqa tilda muloqot qilishni ma'qul ko'rgan oilalar uchun bepul tarjima va tarjima xizmatlarini taqdim etadi. Agar sizga yordam kerak bo'lsa, masalan, ota-onalar konferentsiyasi paytida yoki o'quvchigiz uchun maxsus ta'lim xizmatlarini olish uchun maktabingiz direktori yoki ota-ona koordinatoriga murojaat qiling. Shuningdek, siz til bo'yicha qo'shimcha manbalar, fikr-mulohaza bildirish, so'rov yoki shikoyat yuborish uchun schools.nyc.gov/hello saytiga tashrif buyurishingiz mumkin.



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Prindërit: Shkollat Publike NYC flasin Gjuhën Tuaj

[Albanian]

Të gjitha shkollat publike NYC ofrojnë shërbime përkthimi dhe interpretimi falas për familjet që preferojnë të komunikojnë në një gjuhë tjetër përveç anglishtes. Nëse keni nevojë për ndihmë, si për shembull, gjatë një takimi prindër-mësues/e ose për të marrë shërbime arsimore speciale për fëmijën tuaj, kontaktoni drejtorin ose koordinatorin e prindërve të shkollës suaj. Gjithashtu mund të vizitoni schools.nyc.gov/hello për burime shtesë ndihme gjuhësore, për të dhënë mendime dhe sugjerime ose për pyetje apo ankesa.

[Arabic]

أعزائنا الآباء: المدارس العامة بمدينة نيويورك تتحدث لغتكم

تقدم جميع المدارس العامة بمدينة نيويورك خدمات الترجمة التحريرية والترجمة الشفوية مجاناً للعائلات التي تفضل التواصل بلغة غير اللغة الإنكليزية. إذا كنتم بحاجة إلى مساعدة، مثل أثناء اجتماعات الآباء والمعلمين أو للحصول على خدمات التعليم لذوي الاحتياجات الخاصة لتلميذكم، اتصلوا بمدير(ة) مدرستكم أو منسق(ة) شؤون الآباء. يمكنكم أيضاً زيارة الرابط schools.nyc.gov/hello للحصول على موارد إضافية لخدمات المساعدة اللغوية، أو لتقديم ملاحظات، أو لتقديم استفسارات أو شكوى.

পিতামাতাগণ: নিউ ইয়র্ক সিটি পাবলিক স্কুলস্ আপনার ভাষায় কথা বলে

[Bangla]

যেসব পরিবার ইংরেজি ভিন্ন অন্য ভাষায় কথাপকথন করতে পছন্দ করেন, তাদের জন্য নিউ ইয়র্ক সিটির সকল পাবলিক স্কুল বিনা খরচে অনুবাদ এবং দোভাষী পরিষেবা প্রদান করে। আপনার যদি সহায়তা প্রয়োজন হয়, যেমন একটি প্যারেন্ট টিচার কনফারেন্সের সময় অথবা আপনার শিক্ষার্থীর জন্য বিভিন্ন স্পেশাল এডুকেশন পরিষেবা পেতে, তবে আপনার স্কুলের প্রিন্সিপাল অথবা প্যারেন্ট কোঅর্ডিনেটরের সাথে যোগাযোগ করুন। এছাড়াও আপনি ভাষাগত সহায়তা সংক্রান্ত বাড়তি তথ্য-সংস্থান পেতে, মতামত প্রদান করতে, অথবা প্রশ্ন কিংবা অভিযোগ জমা দেয়ার জন্য schools.nyc.gov/hello দেখতে পারেন।

各位家长：纽约市公立学校讲您的语言

[Chinese- Simplified]

所有纽约市公立学校为想以英语以外的其他语言沟通的家庭提供免费的翻译和口译服务。如果您需要协助（例如在召开家长教师会议期间，或为学生要求得到特殊教育服务时），请联络您学校的校长或家长专员。您也可以造访网址：schools.nyc.gov/hello，查看更多语言协助资源、提供反馈意见，或者递交要求或投诉。

各位家长：紐約市公立學校說您的語言

[Chinese-Traditional]

所有紐約市公立學校為想以英語以外的其他語言溝通的家庭提供免費的翻譯和口譯服務。如果您需要協助（例如在召開家長教師會議期間，或為學生要求得到特殊教育服務時），請聯絡您學校的校長或家長專員。您也可以造訪網址：schools.nyc.gov/hello，查看更多語言協助資源、提供反饋意見，或者遞交要求或投訴。

Parents : les écoles publiques de NYC parlent votre langue

[French]

Toutes les écoles publiques de NYC proposent des services gratuits de traduction et d'interprétation aux familles qui préfèrent communiquer dans une langue autre que l'anglais. Si vous avez besoin d'aide, par exemple lors d'une rencontre parents-enseignants ou pour obtenir des services d'éducation spécialisée pour votre enfant, contactez le directeur/la directrice de son école ou la personne en charge de la coordination des parents. Vous pouvez aussi vous rendre sur schools.nyc.gov/hello pour obtenir des ressources supplémentaires en matière de services d'assistance linguistique, donner votre avis ou soumettre des questions ou une réclamation.

Paran: Lekòl Leta Vil Nouyòk pale lang ou pale a

[Haitian Creole]

Tout lekòl leta Vil Nouyòk yo ofri sèvis tradiksyon ak entèpretasyon gratis pou fanmi ki prefere kominike nan yon lòt lang ki pa anglè. Si w bezwen èd, tankou pandan yon konferans pwofesè paran oswa pou w jwenn sèvis edikasyon espesyal pou elèv ou a, kontakte direktè oswa kowòdonatè paran lekòl ou a. Ou ka ale tou nan schools.nyc.gov/hello pou jwenn lòt resous ki ede nan lang, pou bay opinyon, oswa pou fè yon demann oswa pote yon plant.





**JUMAANE D.
WILLIAMS**

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON EDUCATION
SEPTEMBER 30, 2025**

Good morning,

I am Jumaane D. Williams, the Public Advocate for the City of New York. I thank Chair Joseph and the members of the Committee on Education for holding this important hearing.

The Trump Administration has made relentless attacks on immigrant communities, as well as language access itself by declaring English the official language of the United States and instructing the federal government not to provide aid in any other language. It is more important than ever to ensure that we as a city are supporting English Language Learners (ELLs) and the immigrants who call this city home. In response, my office released “Let’s Talk: A Review of Language Access in NYC,” a report that examined the current language access landscape and made recommendations for how to improve such access in our city.

New York City is the most linguistically diverse place in the world, with over 700 languages and dialects spoken within the five boroughs.¹ In 2024, almost half of New Yorkers spoke a language other than English at home, with almost half of those speaking English “less than very well.”² The share of New York City public school students who are learning English has increased by almost 17 percent in the last three years as the city and its schools welcomed tens of thousands of asylum-seekers and immigrants.³ On average, English learners are less likely to graduate in four years than their English-speaking peers.⁴

Under New York State law, public schools are required to provide English Language Learner

¹ <https://languagemap.nyc/info/About>

²

<https://data.census.gov/table/ACSST1Y2024.S1601?t=Language+Spoken+at+Home&g=160XX00US3651000>

³ <https://www.nytimes.com/2025/09/09/nyregion/new-york-schools-english-language-learners.html>

⁴

<https://www.nyu.edu/about/news-publications/news/2024/may/how-likely-are-english-learners-to-graduate-from-high-school--ne.html>

students with equal access to all school programs and services offered to non-ELL students.⁵ This mandate does not only include classroom instruction, but also entitles them to full participation in extracurricular activities, support services and interventions.⁶ Parents and caregivers also have a right to an interpreter or translator during critical interactions with the school district, and to receive information about their child's progress and development.

Despite New York's protections for ELL students, a recent audit by the New York City Comptroller's Office found that NYC Public Schools routinely fail to provide the required ELL instruction and ensure ELL students are educated by teachers with the proper certification.⁷ In their analysis of the records of over 300 ELL students, nearly half did not receive required courses or the minimum amount of instructional time. Forty percent of the students were served by teachers who did not have the required certifications.⁸

In addition, the Comptroller's investigation found that NYCPS failed to implement bilingual education programs as required by improperly relying on waivers for low-incidence languages. Schools are required to create bilingual education programs if there are 15 or more students in two contiguous grades who speak the same home language other than English, or if there are 20 or more students in the same grade who speak the same language.⁹ Waivers for low-incidence languages last for one year and can be requested for no more than five consecutive years. Out of the 150 waivers NYCPS requested during the 2024-2025 school year, 146 exceeded the five-year exemption limit. Despite the increasing number of ELL students, NYCPS only added nine bilingual programs between the 2022-2023 school year and last school year.¹⁰ This is unacceptable. NYCPS has also routinely failed to provide parents and caregivers with information about their ELL program options, including bilingual education programs in their districts.¹¹ Schools often do not communicate with parents and caregivers who have Limited English Proficiency (LEP) in their preferred languages. Earlier this year, NYCPS settled a 2019 lawsuit alleging that NYCPS did not provide sufficient language access services to four

5

<https://comptroller.nyc.gov/reports/audit-report-on-the-department-of-educations-compliance-with-regulations-regarding-english-language-learners-audit/>

6

https://docs.steinhardt.nyu.edu/pdfs/metrocenter/nbm3/parents_rights_english.pdf?_ga=2.200069480.79352691.1757961915-569572895.1757961203

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<https://comptroller.nyc.gov/reports/audit-report-on-the-department-of-educations-compliance-with-regulations-regarding-english-language-learners-audit/>

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<https://comptroller.nyc.gov/reports/audit-report-on-the-department-of-educations-compliance-with-regulations-regarding-english-language-learners-audit/>

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<https://comptroller.nyc.gov/reports/audit-report-on-the-department-of-educations-compliance-with-regulations-regarding-english-language-learners-audit/>

10

<https://www.chalkbeat.org/newyork/2025/09/08/comptroller-brad-lander-english-language-learners-audit-nyc-public-schools/>

11

<https://comptroller.nyc.gov/reports/audit-report-on-the-department-of-educations-compliance-with-regulations-regarding-english-language-learners-audit/>

immigrant parents with limited English proficiency.¹² Each of the four families represented received \$11,000 for the harm they experienced, which included a mother receiving a call in English informing her that her child had been hospitalized following a seizure and was unable to understand any of the details other than the name of the hospital. Another plaintiff, the mother of an autistic student, requested an interpreter for a school meeting and was told by a staff member, “Why don’t you learn English?” This is both inappropriate and illegal, and no parent should experience such discrimination in our public schools.

Lastly, the Office of Pupil Transportation (OPT) Call Center only provides service in English and Spanish—and the Spanish-language support is only available during certain hours. Families and schools have reported, again and again, that school buses are frequently late, delayed, or do not show up at all, and that students’ IEPs are not being followed, leaving parents and schools scrambling to locate students. For parents and caregivers who do not speak English, the lack of language access at the OPT Call Center means they are unable to communicate with those who are best positioned to assist them.

NYCPS awarded OPT \$14 million to improve its help desk. The first priority must be to provide language access in the 16 languages NYCPS is required to support. Further, the emergency contact cards distributed to parents to provide crucial information about their child, such as who can receive a child and whether or not the child may be dropped off unattended, must be double-sided—the front, to be filled out by the parent, in English, with translations into nine languages on the back. However, the card accessible on the NYCPS’s website does not include the second side, leaving the form only available in English. NYCPS and OPT must mail these two-sided cards to students’ homes with route letters, and they should be resupplied to vendors before the first day of school every year. At an absolute minimum, the two-sided, printable card should be available online.

New York City must ensure that all students receive the support and services they need and are legally entitled to receive. Teachers have the proper certification to teach ELL students. The city should create a centralized Office of Language Access, which would ensure compliance across city agencies with Local Law 30 of 2017, the city’s comprehensive language access law. At a time when the Supreme Court has ruled that merely speaking Spanish is grounds to be stopped by law enforcement, we must do all we can to protect our immigrant friends, neighbors, community members, and loved ones.

Thank you.

¹² <https://documentednyc.com/2025/02/07/immigrant-parents-lawsuit-school-nyc/>

Oversight: Language Access in New York City Public Schools-09-30-25

Greetings! My name is Shirley Aubin and I am the Queens Borough President Donovan Richards' Appointee to the Panel for Educational Policy (QBPA PEP) testifying in my personal capacity. Thank you for the opportunity to give input today. I am in support of:

- **Int. No. 1136 (Krishnan)**, a Local Law... in relation to requiring the department of education to distribute information about the importance of dental care
- **Int. No. 1137 (Krishnan)**, a Local Law... in relation to distributing information on vaccines to parents of students in New York city schools
- **Res. No. 54 (Ayala)**, a Resolution calling on the New York City Department of Education and the New York State Education Department to collaborate on and prioritize increasing the number of educators trained to work with English Language Learners and to improve the quality and comprehensiveness of English Language Learners' education

Our NYC Public Schools (NYCPS) play a pivotal role in ensuring equity and language access in our communities in the city of New York.

There is no denying of the simple fact, the school community affects the community/communities where that school building stands and the surrounding community/communities will shape and affect what happens in that school building. It is symbiotic. It is imperative that NYCPS is able to communicate and reach all scholars and their families of the needed resources, opportunities, wellness, and education regardless of their native or comfortable language to receive pertinent information. Education is tied in with NYC communities' well-being.

I have seen NYCPS starting to disseminate information on dental care and vaccines on various social media platform but in English. I haven't seen messaging in another language yet but I have seen plenty of other messaging from NYCPS in other languages on social media platforms. Can they do better, absolutely! NYCPS has acknowledged there is a gap in language access and started to take steps to further narrow the gap. Earlier in the year, 3 more languages were added. It increases NYCPS languages from 10 to 13 (which includes English). They have increased funding for Language, Interpretation and Translation services. NYCPS has also added additional languages to an event because there is a large need for a specific community.

Finally, addressing Resolution # 54, in order to accomplish this (besides more money for NYCPS):

1. You need to make the job attractive: Besides pay, housing and transportation need to be addressed. Cost of living in NYC is very high.

2. Tier 6 needs to be amended to attract new educators
3. Protection from the current immigration climate
4. More dual language programs

These are just a few suggestions.

Societies are better when all community members are well-informed and feel as if they belong; they are a part of the whole that is being heard. Breaking down the language barriers and increasing language access in NYC does not fall solely on NYCPS. All city agencies should be breaking down the language barriers. Especially agencies who interact with New Yorkers daily, such as: NYPD, Dept. of Health and Mental Hygiene, NYCHA, and Dept. of Transportation. Collectively, we as a city must come together to ensure language access and equity.

Thank you all for reading my testimony and allowing my voice to be heard on language access in NYCPS.

Educationally Yours,
Shirley Aubin



Testimony of Michael Mulgrew, UFT president, submitted before the New York City Council Committee on Education

My name is Michael Mulgrew, and I am the president of the United Federation of Teachers (UFT). On behalf of our 200,000 members, I want to thank Education Chair Rita Joseph and the members of the City Council Committee on Education for holding today's hearing. I would also like to thank Council Member Diana Ayala for sponsoring City Council Res. 54 (2025), which calls on the New York City Department of Education (NYC DOE) and the New York State Education Department (NYSED) to collaborate on and prioritize increasing the number of educators trained to work with English language learners and to improve the quality and comprehensiveness of English language learners' education.

This conversation is always important, but it is especially critical now as we confront federal funding cuts and reflect on how the school year began for English language learners (ELLs) in New York City.

This past June, the Trump administration slashed millions from NYC's budget, including essential funding for programs that support migrant students. While this funding was restored, thanks to the advocacy of educators and our allies, the initial cuts highlight how precarious funding is for our immigrant students and all students who are acquiring English at this time.

Just weeks ago, thousands of ELLs began the 2025–26 school year without their legally mandated services. According to the comptroller's office, 48% of sampled ELL students were not provided with their required courses or instructional minutes. The comptroller's audit also found that the DOE was inappropriately requesting waivers so it wouldn't have to create mandated bilingual education programs and did not maintain records to show that the DOE informed parents of their rights in their native languages.

Further, teachers have reported to us that their students miss out on weeks of instructional minutes at the beginning of the school year as they deal with paperwork and intake assessments related to the identification process. This happens again at the end of the school year when teachers are administering and correcting the New York State English as a Second Language Achievement Test (NYSESLAT).

These failings are due to a lack of certified English as a new language (ENL) and bilingual teachers, as well as a lack of oversight and policy enforcement at the ground level — two overarching issues that the UFT has actively worked to combat.



In the 2023–24 school year, when many immigrant students arrived in NYC, the union negotiated annual bonuses for teachers who were willing to become certified ENL and bilingual educators. In November of 2024, the union negotiated another annual bonus of \$5,000 for tenured special education teachers with a bilingual extension to combine those two specialties. Both agreements have been renewed for the 2025–26 school year.

Additionally, the UFT has made it possible for more teachers to enter the ENL field by creating two graduate-level courses in teaching English to speakers of other languages. We offer these courses each semester, and many teachers have used them to earn NY State certification. We also provide professional development for ENL teachers through the UFT Teacher Center and other community partners. We publish a monthly newsletter, “The ELL Educator,” to share resources and professional learning opportunities with educators who serve multilingual students.

For the past few years, the UFT has repeatedly asked for a point person within each district to build relationships with educators of ELLs and provide guidance. We have also asked that principals and superintendents receive training on best practices for programming ENL teachers and on intake and assessment processes that ensure ELLs will receive the ENL services to which they are entitled. These requests have not been met in all districts or schools. The UFT believes their consistent implementation will enable the DOE to better meet student needs.

All students deserve an education that allows them to grow and thrive, regardless of what languages they speak. We must do better for our ELL students to ensure that they do not miss out on any academic and developmental opportunities.



Advocates for Children of New York

Protecting every child's right to learn

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

Re: Language Access in New York City Public Schools

September 30, 2025

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Thank you for the opportunity to discuss language access in New York City public schools. My name is Rita Rodriguez Engberg, and I am the Director of the Immigrant Students' Rights Project at Advocates for Children of New York (AFC). For more than 50 years, AFC has worked to ensure a high-quality education for New York students who face barriers to academic success, focusing on students from low-income backgrounds. We speak out for students whose needs are often overlooked, such as students with disabilities, students from immigrant families, and students who are homeless.

AFC's Immigrant Students' Rights Project advocates for better educational opportunities for English Language Learners (ELLs) and immigrant families in New York City Public Schools (NYCPS). We provide direct one-on-one assistance to families whose primary language is not English on education-related issues including enrollment, special education, ELL services, and language access, and we provide know-your-rights workshops in multiple languages and share resources at family fairs throughout the City. Based on this work and our extensive contact with immigrant families, we are highlighting several concerns and recommendations regarding language access and communication.

Diversity of NYCPS Families Requires Multifaceted Communication Methods

As you know, New York City is home to families who speak over 200 languages, including Indigenous and unwritten languages. Many NYCPS parents have limited literacy in their home language, and others have limited digital literacy or lack reliable internet access, preventing them from fully engaging with their children's schools. In our work, we see parents who rely on translated paper communications because they do not use email or the web. We meet other parents who do not read or write in their home language, and who rely entirely on in-person meetings and phone calls with an interpreter to stay up-to-date on their children's education. When we



address language access, we must address communication more generally because providing translation and interpretation is not enough – families must first have access to the language. This is why we urge NYCPS to utilize a multifaceted approach to communicating with families which uses phone calls, paper notices, in-person meetings, ethnic media, poster campaigns in our neighborhoods, partnerships with community-based organizations (CBOs) and other forms of culturally appropriate communication.

Schools Must Provide Language Access to All Families Who Need It

We continue to hear from families who do not receive basic language access services from their schools or NYCPS offices. For example, we hear about:

- Family-facing school staff who do not offer the use of phone interpretation to families and turn them away when they visit their school with a concern or question
- Special education teams who are not aware that parents have the right to translated special education documents provided by the Office of Language Access
- Educators who ask children to interpret for adults at Parent-Teacher Conferences
- School staff who are not trained interpreters and do not follow basic practices when serving as interpreters at formal school meetings such as Individualized Education Program (IEP) meetings
- Parents who inform the schools that they speak one of the top 12 covered languages but who continue to receive school documents in English only
- Schools that do not address the language needs of families who speak low-incidence and Indigenous languages despite having a budget for translation and interpretation needs
- Automatic-reply emails from NYCPS offices which are in English only
- Information and links on NYCPS's website which are not translated properly

We urge NYCPS to ensure that all schools have a designated Language Access Coordinator, as required by the Chancellor's Regulations, who is trained to ensure parents receive high-quality, culturally appropriate translation and interpretation services from their schools and to make sure parents know who this staff member is and how to get assistance from them.

Renew and Baseline Funding for Immigrant Family Communications

I want to express my gratitude to the Council for working to secure investments in NYCPS's language access services and immigrant family communication initiatives. With the \$4M allocated each year for the last four school years for immigrant family communications and outreach, NYCPS has been able to help families whose primary language is not English by:

- Partnering with community-based organizations to reach families where they live
- Utilizing local and ethnic media to share school-related updates
- Providing translated paper notices about special education



Advocates for Children of New York

Protecting every child's right to learn

- Supporting schools in acquiring interpretation equipment
- Conducting outreach to ensure parents understand their right to an interpreter
- Carrying out language access campaigns on NYC's subways and buses
- Offering centralized translation and interpretation services for schools with high numbers of newcomer immigrant students

This funding is essential to help ensure all parents can understand important communications from schools, including information about their rights, their children's progress, and important school events. However, we are concerned that this funding is not baselined and advocates have to fight for it each year. We therefore urge the City to provide long-term funding for immigrant family communications and outreach which would allow NYCPS to plan ahead and ensure continuity of these essential services.

By investing in these vital services, we are empowering parents to be active partners in their children's education, and we are creating a more equitable and inclusive school system for all. Thank you for the opportunity to testify today. I would be happy to answer any questions you may have.



Asian American Federation

Testimony to the New York City Council

Committee on Education

September 30, 2025

Thank you, Chair Rita C. Joseph, and members of the Committee on Education for holding this hearing and providing us with the opportunity to testify. My name is Nat Moghe, the new Advocacy Coordinator at the Asian American Federation (AAF), where we proudly represent a collective voice of more than 70 member nonprofits serving 1.5 million Asian New Yorkers. Ensuring access to linguistically and culturally competent services plays a vital role in AAF's mission of raising the influence and well-being of the pan-Asian American community through research, policy advocacy, and nonprofit support.

Barriers to Accessing Linguistically Competent Services

Language access for our communities is a matter of equity, dignity, and civil rights. In our current political climate, the nation's official language has been narrowed to "English-only" through Executive Order 14224 signed on March 1, 2025, creating additional barriers for our limited English proficient community members. Essentially, this not only declares English as the official language of the country, but also instructs the federal government to not provide support in any other language. Asian Americans have the highest rate of limited-English language proficiency (LEP) in the city, with nearly 45% of all Asians in NYC and 72% of our seniors being LEP. This means that nearly one in two Asians face barriers to accessing the services they need. Furthermore, LEP Asian Americans are more likely to live in poverty and have lower education levels than their non-LEP counterparts. As of 2020, only 22% of LEP Asian adults over 25 years old had a bachelor's degree or higher, compared to 67% of English-proficient Asian adults of the same age group.¹

Specifically in education, linguistically isolated households and schools serve as a major barrier for Asian American children. School-aged children, defined as those between the ages of 5 and 17, make up a significant share of the Asian American community in NYC, greater than 15% of the population in 21 districts.² As found in our 2021 brief, *Hidden in Plain Sight: Asian Poverty in the New York Metro Area*, Asian children living in poverty were more than twice as likely as non-Asian children to be living in a linguistically isolated household.³ In linguistically isolated households, adults may be unable to access the educational programs and assistance they need for their children or the family as a whole due to limited English language skills. These services include oral interpretation, written translation of vital documents, and more. Another barrier our communities often face is a lack of resources for those with a preferred language that is not widely spoken. In the midst of these challenges, our community-based organizations (CBOs) have offered an outlet of safety and support for immigrant communities by providing culturally and linguistically appropriate services and initiatives. With our communities facing extreme linguistic barriers due to changes in federal policy, our city must step up to ensure New Yorkers have access to language support.

¹ Asian Languages in New York City - Asian American Federation. (2023, August 16). Asian American Federation. <https://www.aafederation.org/research/asian-languages-in-new-york-city/>

² Asian American Federation Census Information Center. (2025, May 5). Expanding Communities, Expanding Needs: Asian Communities in New York City Council Districts 2025 - Asian American Federation. Asian American Federation. <https://www.aafederation.org/expanding-communities-expanding-needs-asian-communities-in-new-york-city-council-districts-2025/>

³ Asian American Federation. (2021, October 15). Hidden in Plain Sight: Asian Poverty in the New York Metro Area - Asian American Federation. Asian American Federation. <https://www.aafederation.org/hidden-in-plain-sight-asian-poverty-in-the-new-york-metro-area/>

AAF's Language Access Advocacy

AAF is a member of the Language Justice Collaborative (LJC), and we work closely with mission-aligned advocates, African Communities Together (ACT), MASA, NY Immigration Coalition (NYIC), and Haitian Americans United for Progress (HAUP) with a shared goal - to eliminate language and cultural barriers for immigrants' access to public services. Together, we advocate for increased language access through the enforcement of existing laws and by creating innovative programs to address gaps in language interpretation services. To that end, we have developed language worker cooperatives, a language bank, and provided interpreter training to address these barriers while also creating pathways to employment for our communities. We are grateful for the council's investment in language access services, which will allow immigrants to participate fully and benefit from critical services, regardless of the language they speak.⁴

Through this work, AAF worked with our nonprofit member organizations to recruit 15 community members to serve as prospective interpreters in the Asian language worker cooperative. These community members are fluent in the top Asian languages in NYC - Arabic, Bengali, Chinese (Cantonese and Mandarin) Korean, and Urdu. These interpreters, alongside translators from other immigrant communities served by LJC, are training to fill the critical need for high-quality interpretation for NYC area government, nonprofits, schools, hospitals, and the private sector, while also providing opportunities for income and business ownership for the same immigrant communities that need them. We applaud the City Council's support and encourage the Council to continue supporting our work in the FY27 budget to ensure continuity and sustainability for the development of these ongoing programs.

Recommendations

Over the long term, educational opportunities for both LEP children and adults are the route out of poverty and lead to increased integration of immigrant communities. We recommend the City Council:

- **Continue to prioritize funding for worker language co-ops** that are trying to get off the ground so that LEP community members can access the interpretation/translation services they need in their preferred language.
- **Support and advance the NY State Language Access Expansion Act**, which would expand uniform language access standards to local branches of critical state agencies that immigrant families depend on- such as the Department of Education- and establish a countywide list of languages for translation.
- **Implement a comprehensive in-language outreach campaign**, particularly for low-income families, to ensure that Asian American parents and children are aware of and have access to all educational opportunities available to them (See the 2023 NYC Language Access Campaign).⁵
- **Ensure that NYC public schools have linguistically and culturally competent resources through the educational workforce development programs** that prioritize adult language learners, especially female Asian American immigrants, who experience higher rates of poverty and lower workforce participation than Asian men, and are tailored to address their specific cultural needs.
- **Strengthen partnerships between government agencies and CBOs** that provide language translation and interpretation services to bridge critical service gaps in education.
- **Support Int 1336 and Int 1337**, introduced by Council Member Krishnan, to ensure the DOE develops in-language materials for students and parents.

⁴ Language Justice Collaborative. (2019). *Language Justice Collaborative*. Language Justice Collaborative. <https://www.languagejustice.nyc/>

⁵ Language Justice Collaborative. (2023). 2023 NYC Language Access Campaign. Language Justice Collaborative. <https://www.languagejustice.nyc/2023-nyc-language-access-campaign>



Asian American Federation

- **Support Resolution 0054**, introduced by Deputy Speaker Ayala, prioritizing the increase of culturally and linguistically competent educators trained to work with English Language Learners.

Conclusion

With our LEP communities currently being met with detrimental barriers to accessing the services they need, this moment presents an opportunity for the City Council to show that NYC can lead by example in protecting its most vulnerable. We at the Asian American Federation thank you for allowing us to testify and look forward to working with you all to ensure our LEP Asian communities continue to get the support they deserve. If you have any questions, I can be contacted at nat.moghe@aafederation.org.

TESTIMONY

**NYC COUNCIL COMMITTEE ON EDUCATION
CHAIR, RITA JOSEPH**

Oversight – Language Access in NYC Public Schools

**Presented on
Tuesday, September 30, 2025**



**SINCE 1962
COUNCIL OF SCHOOL
SUPERVISORS &
ADMINISTRATORS
Local 1: AFSA, AFL-CIO**

**The Council of School Supervisors and Administrators
Henry Rubio, President
Dale Kelly, Executive Vice President
Stamo Karalazarides Rosenberg, First Vice President**

**40 Rector Street, 12th Floor
New York, NY 10006
(212) 823-2020
www.csa-nyc.org**

Good morning, Chair Rita Joseph, and members of the City Council Committee on Education. Thank you for holding this critical hearing on Language Access in New York City Public Schools. My name is Henry Rubio, and I am the President of the Council of School Supervisors and Administrators, representing nearly 20,000 in-service and retired public school leaders: our principals, assistant principals, administrators, supervisors, and early childhood education directors.

Language access is not an abstract policy for our members, but essential to our daily work. Every morning, we welcome families who speak more than 180 different languages, each with the same hope: that they will be understood, that they will have the same access to a high-quality education as their neighbors, and that their children will be given every opportunity to thrive. This hearing signals that the City Council, the Department of Education, and school leaders are united in that vision.

Every new school year, our principals sit with immigrant parents, helping them register their children, explaining schedules, and translating the culture of our schools. Imagine a mother who speaks a foreign language, registering her first-grader for her first year of school in New York City. She wants to know that the school understands her child's needs, that she will receive report cards and IEP notices in a language she can read, and that her voice will shape her child's education. That trust begins with clear, timely, and accurate communication in her home language.

New York City has long recognized this responsibility. The Parents' Bill of Rights for Multilingual Learners and the DOE's Language Access Policy guarantee free interpretation at meetings and translation of vital documents, while Local Law 30 requires agencies to provide services in twelve major languages and to make best efforts in all others. These are strong commitments. Yet, as the New York City Comptroller's September 2025 audit revealed, we have work to do: nearly half of the English Language Learners in the audit's sample did not receive the required instructional minutes or proper program placement, and about 40 percent were taught by teachers without the appropriate certification.

These shortcomings are even more pronounced when special education is involved. Many Individualized Education Programs (IEPs) specify that services such as speech therapy, occupational therapy, and literacy support must be delivered in a student's home language. Federal law under the Individuals with Disabilities Education Act (IDEA) makes this a legal requirement. Yet too often the DOE cannot locate certified bilingual special-education teachers or related-service providers beyond English and Spanish. Families leave IEP meetings believing their child will receive therapy in their own language, only to discover that no provider is available. Children who need both language access and special-education support can wait weeks or months for appropriate services, or receive English-only instruction with an interpreter, which is not the same as the bilingual service promised.

This gap between promise and practice for general and special education students has become even more visible in the past two years. Since 2022, hundreds of thousands of asylum seekers have arrived in New York City, with tens of thousands of children entering our public schools. ELL enrollment has increased by nearly 10 percent in a single year, a historic rise that has

strained bilingual programs and exposed long-standing staffing shortages. Principals who want to open dual-language programs cannot simply conjure certified bilingual teachers.

Consider a principal in Queens suddenly enrolling twenty-five foreign-speaking newcomers. He knows a dual-language program would serve them best. But there are not enough state-certified bilingual teachers nor enough curriculum materials. Families, meanwhile, hear DOE messages like “ask your principal to start a dual-language program,” despite not having enough resources to do so. Frustration grows for everyone.

This is where managing expectations becomes so essential. When parents receive DOE brochures that present three exciting program models—Dual Language, Transitional Bilingual, and English as a New Language (ENL)—they often believe those options are equally available everywhere. They sit across from a principal expecting to choose freely among them. But the hard reality is that, because of staffing shortages and a limited pool of certified bilingual teachers, most families will only have access to ENL. Without clear, upfront communication from the central office, principals are left explaining why what was promised on paper cannot be delivered in practice. Parents feel misled, and principals feel as though they are failing families when, in truth, this is a systemic resource issue, not an individual school’s reluctance.

Our principals know that trust with families depends on honesty. Our school leaders, the DOE, and the City Council are partners striving for the same goal: ensuring that every parent, regardless of language, has meaningful access to their child’s education. We recognize the progress that has been made, including the 2025 settlement with Legal Services NYC that requires better tracking of interpretation requests and stronger notification to families. But we also know that real improvement demands honest conversation and shared action.

First, we must provide families with clear, realistic information from the start. Parents should know which bilingual programs truly exist in their district and how long it might take to secure a seat. This prevents disappointment and builds trust. It also allows parents to advocate for what is feasible and to work with school leaders on creative interim supports.

Second, we need centralized support for staffing and curriculum. Recruiting and retaining certified bilingual and bilingual-special-education teachers requires citywide pipelines, salary incentives, and partnerships with our universities. When the DOE mandates a curriculum, it must also secure legally licensed translations or alternative materials so that schools are not left to improvise. They also know that when the DOE centrally mandates a curriculum or program, the DOE must also ensure that materials and staffing exist in the languages our students need.

Third, we need transparent data and accountability. Public reporting on ELL services (minutes provided, certification levels, interpreter requests and fulfillment) will help families, school leaders, and the Council see where we are succeeding and where we must do more.

Imagine the difference these steps can make. Newly arrived parents would be able to register simply online and immediately receive a welcome packet in their first language. They’d be able to choose a program based on accurate seat availability and they’d be provided all materials and

communications in their native language as well as English. Teachers would have curriculum resources in English and the native language of every student in their class.

As educators, we can work together to focus on instruction and the holistic growth of each child, not on patching systemic gaps. Our leaders are committed to doing their part. They will continue to welcome families regardless of the language they speak, to advocate for resources, and to innovate in their schools. With your partnership and the DOE's support, we can make the City's promises of language access real for every family.

Thank you for the opportunity to testify and for your steadfast commitment to New York City's multilingual students and families.

Sincerely,

Henry D. Rubio

CSA President

**Statement for the Record
New York City Council
Committee on Education
Hearing on Resolution 54
September 30, 2025**

[EdTrust-New York](#) is a statewide nonprofit organization dedicated to eliminating equity and opportunity gaps that hinder students from reaching their full potential. We focus on ensuring that students of color, including Black, Latinx, Native American, and Asian American and Pacific Islander students, and those from low-income backgrounds achieve high levels of success from early childhood through college. Thank you for the opportunity to submit our statement for this hearing.

Today, nearly one in five students in New York City Public Schools (NYCPS) - approximately 19% - are multilingual learners, and 44% of students speak a primary home language other than English.¹ These demographics reflect both the richness of our city and the urgency of our responsibility to ensure that schools in our city remain places where every child feels safe, supported, and empowered to thrive.

In New York City, the English and Language Arts proficiency rate of current multilingual learners is 12.5%. Although this reflects an increase of 4.7 percentage points from the previous year², the data make clear that multilingual learners continue to face systemic barriers to achieving grade-level outcomes, particularly in academic language development and access to rigorous content.

It is important to note that “Ever English Language Learners (Ever ELLs),” which represents students who were once classified as English Language Learners (ELLs) but have since demonstrated English proficiency and exited ELL status, outperformed all students with a 71.9% proficiency rate. This is compared to 62.7% for “Never ELLs”, which represents students who have never been classified as ELLs in English and Language Arts (NYC DOE, 2025). This success demonstrates that when multilingual learners receive rigorous, grade-level instruction, they can achieve proficiency and thrive, as is also ³.


Too often, responsibility for multilingual learner success is placed solely on bilingual or English as a New Language (ENL) specialists. Yet multilingual learners are enrolled in every subject and every classroom, making it clear that their academic achievement is a collective responsibility.

¹ New York City Department of Education. (2025, August). *2024-25 ELL demographics: At-a-glance*. <https://infohub.nyced.org/docs/default-source/default-document-library/2024-25-ell-demographics-at-a-glance.pdf>

² New York City Department of Education. (2025, August). *2025 math & ELA results (Web deck)*. <https://infohub.nyced.org/docs/default-source/default-document-library/2025-math-ela---web-deck.pdf>

³ New York City Department of Education. (2025, January). *2024 graduation rates: Class of 2024 (2020 cohort)*. <https://infohub.nyced.org/docs/default-source/default-document-library/2024-graduation-rates---forweb.pdf>





Earlier this week, Chancellor Aviles-Ramos announced an investment in an English Language Department curriculum for multilingual learners as part of NYC Reads. We applaud this decision, which is critical for advancing literacy among multilingual learners. However, there remains a pressing need for bilingual curricula in the city's top languages other than English, and multilingual learners require additional scaffolding and support across the English and Language Arts curriculum overall.

Even when students have adequate access to bilingual or ENL specialists, they still face barriers to high-quality instructional supports. As NYC Reads expands literacy instruction grounded in the science of reading, minimal effort has been made to ensure that these supports are built in from the outset or that the curricula are bilingual, leaving multilingual learners at a disadvantage and compounding the academic challenges they already face.

New York City is also expanding its NYC Solves initiative, which aims to standardize math instruction across schools using the high-quality Illustrated Mathematics curriculum. The city plans to expand both NYC Reads and NYC Solves into middle schools next year. As these programs are implemented, it will be critical to ensure that bilingual curriculum supports and scaffolds are available for multilingual learners and their teachers from the outset.

The Case for Building Content Teacher Capacity

While addressing teacher shortages in bilingual and ENL programs is critical, the larger challenge is ensuring that all educators—math, science, social studies, and literacy teachers—are prepared to integrate language development into daily instruction. Students cannot wait until their ENL period to learn the academic vocabulary of algebra, practice scientific reasoning, or develop writing skills in history. If content teachers lack the training and strategies to support multilingual learners, we lose countless opportunities each day to accelerate their growth.

Both New York State Commissioner's Regulation Part 154 and the Blueprint for English Language Learners/Multilingual Learners⁴ affirm that every teacher is a teacher of multilingual learners.


Increasing educator capacity across the workforce—including content teachers, bilingual educators, and ENL specialists—is essential. Resolution 54 rightly urges NYCPS and New York State Education Department (NYSED) to strengthen teacher preparation programs to ensure all educators can support students' linguistic development.

Teacher Shortages and Preparation

ENL and bilingual education remain long-standing statewide shortage areas. NYSED data consistently identify these fields as critical shortage areas, leaving schools underprepared to meet the needs of multilingual learners. New York cannot serve its growing multilingual learner

⁴ New York State Education Department. (2015). *Blueprint for English Language Learner/Multilingual Learner (ELL/MLL) success*. <https://www.nysed.gov/sites/default/files/nys-blueprint-for-ell-success.pdf>





population without both expanding teacher pipelines and equipping all educators—not only ENL and bilingual specialists—with the tools to integrate language and content.

We must also ensure that we create strategic incentives for teachers to enter the workforce, thereby enabling us to increase the number of educators that can provide instruction that meet their linguistic needs. This includes working with NYSED to reinstate the conditional certification program that allowed for reciprocity for qualifying international teachers.

New York has both the opportunity and the obligation to lead the nation in preparing teachers who view multilingualism as an asset. This is especially important in the context of a federal administration rolling back support and guidance for ELLs and multilingual learners. We call on the City Council, NYCPS, and NYSED to leverage policy and collaboration to increase the preparation and capacity of all educators to serve multilingual learners.

Thank you for the opportunity to share our statement.

Please feel free to contact Arlen Benjamin-Gomez at abgomez@edtrustny.org with any additional questions regarding this statement. Thank you.



Committee on Education

“Oversight- Language Access in NYC Public Schools”

Testimony from African Communities Together

September 30, 2025

Good afternoon Chair Joseph and members of the Committee on Education. Thank you for holding today's important hearing.

My name is Airenakhue B. Omoragbon and I am the New York Policy Manager at African Communities Together (ACT). I drive the organization's Hair Braiding, Right to Shelter, and Language Access campaigns, and I also work full-time on the Language Justice Collaborative (LJC) to eliminate language and cultural barriers to immigrants' access to public services.

I am here today to highlight the need to protect and increase the quality of English Language Learning services offered to African young people living in New York City.

Over the past three years, New York City has seen an increase in over 225,000 New Arrivals, seeking asylum and other protection in the United States. Studies show that between 10 and 20% of those migrants are Black, and they speak dialects that are not included in the city's top-ten languages, including but not exclusive to Haitian Creole, Garifuna, Wolof, Fulani, Pulaar, and Swahili. Many came to this city with school-age children, and as a result, we have also seen over 13,000 new English Language Learners enter the public school system between the 2022 and 2023 academic years.

As a national membership organization that is by and for African immigrants, ACT is dedicated to fighting for civil rights, opportunity, and a better life for our communities in the United States. At this time, ACT is concerned about the quality of ELL programs the Department of Education is offering in New York City's public schools, and the longevity of these services in light of federal efforts to deprioritize non-English speaking citizens living in the United States.

For example, earlier this month New York City's Comptroller Office published an Audit Report on the Department of Education's compliance with regulations regarding English Language Learners. In this audit, they found that:

- 48% of sampled ELL students did not receive the required courses or minimum instructional minutes necessary for them to learn alongside their English-speaking peers;
- 40% of sampled ELL students were taught by one or more teachers that lacked the required certifications to teach bilingual courses; and that
- The DOE filed 146 waiver requests to avoid creating mandated Bilingual English Programs for ELL students; The latter especially impacted young people from Russian, Uzbek, Arabic, Bengali, and Haitian-communities.

Due to existing policies like the 30- and 60-day rule, and the constant moving associated with it, many asylum seekers already run the risk of having to constantly file paperwork informing schools of their changes to their address, falling behind in classes, and failing to receive important school documents, like notices to take the NYS English as a Second Language Achievement Tests (NYSESLAT).

By failing to adequately provide them with Bilingual Programs, the Department of Education is actively choosing to set African young people up to fail in their efforts to learn the English language and ultimately get the jobs they need to be successful here in the United States.

Earlier this year our President issued an Executive Order designating English as the official language of the United States. While many people living in the United States are able to speak English fluently, the beautiful history of immigration in this country has made it such that there are millions of Americans who do not.

While the Executive Order doesn't explicitly ban agencies from producing documents in languages other than English, it unfortunately gives social service providers the agency to stop considering the language needs of so many American residents.

In the fight for language justice, ACT is known for:

- Advocating for New York City's Local Law 30, mandating the translation of documents into the 10 designated citywide languages; and
- Pushing for the passage of New York State Language Access Law (Chapter 56 of 2022), which codified New York's language access policy and expanded the statewide languages of translation from 6 to 12, to include languages like French and Arabic.

However, we are most proud of the work we did to create and bolster AfriLingual, New York's first and premier African worker-owned language collaborative.

Back in 2022, when there was an influx in New Arrivals coming into New York City, African Communities Together partnered with AfriLingual, to conduct a set of cultural competency workshops for Department of Education (DOE) staff and complete a GenConnect project involving African families and the DOE. We educated people on the hundreds of languages that are spoken in the continent of Africa, the cultural and language barriers young people face at school, and the challenges they face in trying to get an education and learn English here in the United States.

So you can only imagine the disappointment we face in seeing the extent to which African children are being neglected in the classroom.

For ACT, the fight to protect and increase the quality of ELL programs offered to African young people is personal. Because of this, we ask the City Council to continue to see ACT and AfriLingual as a resource in solving this challenge, now and in years to come.

Thank you.

Submitted by:

Airenakhue B. Omoragbon, MSSW, LMSW

NY Policy Manager

African Communities Together



INTERNATIONALS NETWORK

Transforming education for multilingual learners

TESTIMONY

TO: NYC Council Committee on Education

FROM: Eduardo Antonetti, Internationals Network for Public Schools

DATE: September 30, 2025

RE: Meeting the Needs of ELLs in NYCPS

Esteemed Chair Joseph and Members of the Committee on Education:

My name is Dr. Eduardo Antonetti, and I am the Senior Director of Advancement for Internationals Network. Internationals Network is an education nonprofit organization with more than 20 years of success in supporting immigrant and refugee students in New York City public schools. There are 17 International schools in New York City, and we have supported an additional 20 schools with their newcomer population since 2023. I'm pleased to report that Queens International Secondary School, our first grades 6-12 school, just opened in Ridgewood, and its doors are open to welcome new students. Thank you for the opportunity to offer testimony on the oversight topic of Language Access in NYC public schools. I am here today to emphasize the critical importance of increasing the number of educators trained to work with multilingual learners.

The influx of new arrivals into New York City Schools in recent years has amplified the need for more highly trained teachers to serve newcomer multilingual learners. In the early 2000s, Internationals partnered with other organizations and advocated for the creation of the NYC Department of Education's Translation and Interpretation unit, and we worked to ensure the T&I unit was structured to meet the needs of schools providing these language services for families. Today, our schools continue to actively use T&I services, and we appreciate the funding that the city council provides each year to ensure that these services continue and even expand promising programs such as the Future Ready interpreter program.

One way New York can increase the number of qualified educators is to create a pipeline from within our schools by investing in our multilingual students. Currently, nearly one hundred alumni from our Internationals schools are working in our public schools as principals, assistant principals, school counselors, teachers, and staff. These amazing educators are former multilingual students whose lives were deeply impacted by our schools, and they chose to pursue careers as educators so they could give back to the next generation.

Thank you for your continued support of our public schools and our newest New Yorkers.

Respectfully submitted,

Eduardo Antonetti, Ed.D.



**Testimony of Katherine DiVasto Before
the New York City Council, Committee on Education
Regarding Oversight of Language Access Services in NYC Public Schools
September 30, 2025**

Legal Services NYC (LSNYC) respectfully submits the following testimony as part of the hearing held by the City Council's Committee on Education regarding oversight of language access services in New York City (NYC) Public Schools.

Introduction:

I am Katherine DiVasto, a staff attorney in the Education & Students' Rights Unit of Queens Legal Services, part of Legal Services NYC, the largest provider of free civil legal services in the country. For over 50 years, LSNYC staff have fought for racial, social, and economic justice for low-income NYC residents. The Education & Student's Rights Unit fights for students to access appropriate special education services, combat the school-to-prison pipeline, support healing-centered schools, and enforce families' language access rights.

Thank you to the Committee on Education for the opportunity to discuss language access issues in NYC public schools, particularly for English Language Learner students and their families. Language access issues are very important and there are a number of concrete steps that the NYC Department of Education (DOE) could take to improve access to schooling information for all NYC families, no matter their language. For example, multiple recommendations made by the NYC Comptroller to improve recruitment of trained staff, training, and tracking of communications to families about their educational rights in the ELL process could benefit NYC families if applied to DOE processes for communicating with families more broadly.

Demand Justice.

Students and Families with Limited English Proficiency in the NYC Public School System

In the 2023-24 school year, students who were English Language Learners (ELLs) composed 16.3%, or approximately 148,666, of the nearly one million New York City Public School students.¹ Many parents and caregivers of these students also have Limited English Proficiency (LEP) and require communications in their home language instead of English. Many students who are not ELLs also have parents who require language access services.

At Queens Legal Services, we are passionate about serving families in Queens, one of the most ethnically and culturally diverse areas of the United States, where the majority of residents speak a language other than English at home². Much of my work with clients includes working with interpreters to explain complex educational policies such as the special education process to families who cannot easily access information on these topics in their home language. The Education & Student's Rights Unit also advocates for families to receive timely bilingual evaluations, translated notices, interpretation for hearings and critical meetings, as well as consistent verbal and written communications from school staff in clients' home languages so that parents and caregivers can fully participate in educational decision making for their children. In addition to individual client services, my LSNYC colleagues and I have enforced these rights through federal litigation and conduct presentations to inform families about their language access rights in NYC public schools.

¹ *NYCPS Data at a Glance*, NYC PUBLIC SCHOOLS, <https://www.schools.nyc.gov/about-us/reports/nycps-data-at-a-glance>

² Dataset of Spoken Language at Home for Queens County, UNITED STATES CENSUS BUREAU, *available at* <https://data.census.gov/table/ACSST1Y2024.S0501?q=queens>; Selected Characteristics of the Native and Foreign-Born Populations for Queens County, UNITED STATES CENSUS BUREAU, *available at* <https://data.census.gov/table/ACSST1Y2019.S1601?q=S1601&g=050XX00US36081>

LSNYC Language Access Litigation and Settlement with NYC Department of Education

A new report by the NYC Comptroller found that from at least July 2022 through March 2025, ELL students “did not have equal access to school programs and services” and their parents were not able to meaningfully participate in their children’s education.³ Unfortunately, the NYC Department of Education’s (DOE’s) failures to communicate with families in their home languages is not a new issue. Prior to 2019, LSNYC routinely heard from individual families and community-based organizations like the Alliance for Families with Development Needs (AFDN) that families were not receiving legally required language access services necessary for them to communicate with their children’s schools. Spurred by these stories, in 2019, LSNYC filed a lawsuit on behalf of AFDN and several parents who experienced emotional and educational harm from the NYC DOE’s failure to provide translated or interpreted communications on critical matters of their children’s safety, health, and special education.⁴ LSNYC maintained that such failures violated local and federal educational and civil rights laws including that denial of language access services amounted to discrimination based on national origin.⁵ Further, LSNYC argued that such lack of language access services violated requirements for ensuring notice to parents and their right to informed consent and participation in the special education process.⁶

³ NYC City Comptroller, *Audit Report on the Department of Education’s Compliance with Regulations Regarding English Language Learners Audit* (September 8, 2025), <https://comptroller.nyc.gov/reports/audit-report-on-the-department-of-educations-compliance-with-regulations-regarding-english-language-learners-audit/>

⁴ Press Release, Legal Services NYC, Legal Services NYC Requires NYC Department of Education to Provide Language Access to Non-English Speaking Residents in Recent Settlement (February 7, 2025), <https://www.legalservicesnyc.org/news/legal-services-nyc-requires-nyc-department-of-education-to-provide-language-access-to-non-english-speaking-residents-in-recent-settlement/>

⁵ *Id.*

⁶ *Id.*

This year, LSNYC finally settled that case with an agreement that requires multiple reforms by the NYC DOE concerning staff training, administration of services, accountability measures, and outreach to families about their rights to language access services.⁷ All NYC DOE staff will be required to complete training on provision of language access services and given new guidance on best practices for translation and interpretation.⁸ Every school must have a designated Language Access Coordinator as a point person for school staff on language access questions.⁹ There is now a public complaint form on the NYC DOE website for language access issues, and the DOE is required to monitor data such as the amount of translation and interpretation requests received and the number of requests fulfilled each semester.¹⁰ LSNYC appreciates the NYC DOE committing to taking these steps in addition to updating the Chancellor Regulation A-663 on language access policy, including expanding the covered languages from nine to twelve.

Ongoing Language Access Issues Interfering with the Educational Rights of Parents and Caregivers

However, despite the above settlement, LSNYC continues to see holes in the language access provision for families within NYC public schools. We routinely hear from families that they still receive records from NYC DOE about pre-school, special education, or school discipline that are not at all or only partially translated. The DOE also continues to struggle to identify sufficient providers for bilingual evaluations and offer timely translations of special

⁷ *Id.*

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

education records. This results in longer delays in obtaining services or failure to obtain them at all because the family is unable to understand English documents about their schooling options.

The findings in the NYC Comptroller’s report, which match the experiences that LSNYC advocates witness among our clients, show that these language access issues are systemic, not isolated incidents. For example, the NYC Comptroller’s report found that for approximately 31.5% of sampled students who were eligible for ELL services, the NYC DOE did not have record of providing the parents or caregivers a written notice in their home language about their rights to ELL program information and options.¹¹ Additionally, for another 29% of sampled students, while the DOE did provide their parents with notice, the notices sent did not include all of the required information about available programs for ELL students.¹² By failing to provide parents and caregivers of ELL students with complete notices in their language, the DOE “ignored” parent’s rights and contributed to “eroding trust and access for all families” to critical educational opportunities.¹³ Such lack of communication to parents also caused delays or denial of appropriate educational programming because parents were not made aware in their language of the schooling options available for instruction of ELL students.

The NYC Comptroller’s disturbing findings mirror trends we have seen where our clients do not receive translated communications about special education or school discipline processes – all of which involve multiple step processes that can already be difficult for English-proficient families to navigate. The NYC DOE’s failure to provide timely translated or interpreted

¹¹ NYC City Comptroller, *Audit Report on the Department of Education’s Compliance with Regulations Regarding English Language Learners Audit* (September 8, 2025), <https://comptroller.nyc.gov/reports/audit-report-on-the-department-of-educations-compliance-with-regulations-regarding-english-language-learners-audit/>

¹² *Id.*

¹³ New York City Comptroller, *DOE Flunks in Comptroller Lander’s Audit of English Language Learning Service*, (September 8, 2025) <https://comptroller.nyc.gov/newsroom/doe-flunks-in-comptroller-landers-audit-of-english-language-learning-services/>

information can lead students to not receive critical services when needed or at all and impairs parent's abilities to effectively advocate for their children.

The DOE process for conducting Individualized Education Program (IEP) evaluations and meetings for pre-school aged children who are bilingual and/or have parents with LEP often face delays in initial eligibility evaluations that delay services. A parent contacted my office looking for information about how to start the eligibility process after finding out from the pre-K teacher that her daughter showed signs of a speech delay. I sent her translated materials to request the evaluation. The parent submitted the request but did not hear anything from her daughter's pre-K site or Committee on Pre-School Education (CPSE) by her email, phone, or in-person. Instead, only months later she found out that she had received a message in a parent's portal that was only partially translated in Spanish. The letter explained that the parent would have to select an evaluator and call them from a list of providers only given to her in English. I then contacted the CPSE to further help her in arranging an evaluation as soon as possible. Yet, the parent only was given another phone number to call. Thankfully, at the start of a new school year, the child's new Pre-K site offered to restart the initial eligibility process and provide the evaluations during the school day so that the process could finally proceed after months of delays. These delays were avoidable if the DOE more clearly communicated with families, not through limited portals but instead through communication methods already confirmed to work well, and proactively assisted in arranging bilingual evaluations for children with home languages that are not English.

I share another example to show how the DOE process for school discipline continues to frequently fail to sufficiently inform parents and caregivers of their child's case information and their rights in their preferred language so that they effectively advocate for their children. The

student was in middle school and had an IEP for a learning disability and emotional regulation difficulties. He was facing a suspension for behaviors that were later determined to be caused by his disabilities and required more supports like a behavior intervention plan. His mother called my office looking for help after facing difficulties communicating with the school about the suspension, his alternative instruction, and obtaining school records.

However, throughout the disciplinary and special education processes, the parent required my assistance after the DOE failed to fully inform her of her rights and critical facts of about her son's behaviors in her language. Starting with the initial notice of the suspension, the parent did not receive a written notice of the suspension until she went to her son's school and was told that her son had to attend an alternative learning center. The DOE then gave the parent a notice of the suspension hearing that did not have the alleged behaviors and disciplinary infraction translated. The process for preparing for a disciplinary hearing, including being able to review evidence from the school, also placed the parent at a disadvantage because of her limited English proficiency. The school staff collected evidence only written in English and only provided this to the parent without any translation of what it contained.

To address these language access failures by the DOE, I met with the parent to inform the parent for the first time of the details of the alleged disciplinary infraction and behavior, that the school had seen her child engage in similar behavior before and did not report it to her, and comforted her in learning such difficult news. At the meeting to discuss whether the behavior was due to his disabilities, called a manifestation determination review meeting, I had to stop the IEP team members and a teacher who acted as an interpreter, to remind them multiple times to slow and pause for interpretation rather than to only summarize discussion for the parent. The school staff were unfamiliar with professional interpretation practices, and the parent had the

right to know each detail about her son that was discussed. Thankfully, the meeting resulted in her son receiving an evaluation and updated plan to address his disability-related behaviors. However, no parent who is LEP should be forced to hire a lawyer in order to know or exercise their rights to have full access to school disciplinary and special education processes or to stay informed of their child's behaviors, safety, and challenges in school.

The NYC Comptroller's report makes several recommendations to improve the ELL program that we believe could also be applied to the process for pre-school IEPs, superintendent suspension hearing processes, and overall special education processes, thereby benefitting all students whose parents speak a language other than English in the home. For example, the Comptroller stressed the need to enhance efforts to recruit certified teachers for ELL students, enforce training requirements for staff working with ELL students, and have better record-keeping and monitoring requirements.¹⁴ We believe that this would benefit ELL students and their families. Similarly, continuing to monitor training of NYC public school staff on language access rights and obligations, like that agreed to in our 2025 settlement agreement, and expanding it to also include training for staff in Committee on Special Education (CSE) offices, suspension hearing offices, and with special education services vendors could help ensure that *all* parents and caregivers who have limited English proficiency are appropriately advised and able to meaningfully participate in their children's education.

In addition, expanding recruitment efforts for bilingual evaluators and additional staffing for the DOE's Office of Language Access would assist in addressing delays in obtaining evaluations necessary for special education services and the subsequent translations of reports.

¹⁴ *Id.*

Lastly, the NYC Comptroller's report makes several recommendations for implementing tracking, monitoring, and accountability systems, including centralizing collection of data and standardizing procedures for providing accurate information for ELL families.¹⁵ Similar tracking, monitoring, and accountability systems for notices and consent forms about other topics, such as for special education processes for IEPs of pre-school age children and superintendent hearing processes. An example of such changes to tracking and monitoring could include requiring local schools to collect and provide to a centralized citywide tracking system, the parent's preferred language for communications and whether interpretation was provided at the IEP meeting, Increasing monitoring and tracking systems within the NYC Department of Education on measures of language access services provision would significantly benefit families by preventing loss of key educational benefits that regularly stem from the inability to navigate these complex educational processes without sufficient language access services.

The City and Department of Education must work together to make sure no child is denied vital educational opportunity due to an unaddressed language barrier. Thank you for your time.

¹⁵ *Id.*



The New York City Council Committee on Education
Honorable Rita Joseph, Chair
Oversight - Language Access in NYC Public Schools

Testimony of the New York Immigration Coalition
September 30, 2025

Good afternoon Chair Joseph, and members of the Committee. Thank you for the opportunity to testify on the urgent need for language access in our public schools. My name is Yasmin Naji, Manager of Early Childhood & Education Policy at the New York Immigration Coalition (NYIC). The NYIC is an umbrella policy and advocacy organization for more than 200 groups serving immigrants and refugees across New York State. For more than 30 years, the NYIC's Education Collaborative has been at the forefront of efforts to improve education for English Language Learners (ELL) and immigrant students.

We also commend the Council for its leadership in pressing the NYC Department of Education (DOE) to expand supported languages, strengthen oversight, and sustain critical investments such as the Family Communications and Outreach Initiative and Project Open Arms. But with federal protections under attack, your role is even more critical now.

However, today's hearing shows that while DOE claims it is now meeting its obligations, the lived experiences of families and the City's Comptroller's audit show otherwise.

Local Law 30 was intended to guarantee immigrant New Yorkers access to city services in their preferred languages. In schools, this means families should be able to read academic notices, disciplinary letters, and safety alerts without relying on their children to translate. In addition, the recent amendments to Chancellor's Regulation A-663 require principals and parent coordinators to complete training and mandate that each principal designate a Language Access Coordinator responsible for supporting language assistance services within the school, with clear duties outlined for the role. These amendments also increased DOE's supported languages from nine to twelve, an important step forward for immigrant parents who have long



been denied basic communication with their children's schools. But compliance remains inconsistent, accountability is limited, and immigrant families are still being denied the services they are legally entitled to.

Since 2022, New York City has enrolled more than 48,000 newly arrived students into its schools. That surge did not create new problems in our schools; it exacerbated long-standing inequities. In one Manhattan elementary school that welcomed many recent arrivals, one student [explained](#) that all instruction and communication were only in English. She did not talk to any of her classmates and felt she had no choice but to stay silent. Her mother described the difficulty of communicating with the school because so few staff spoke Spanish. There was one person she could sometimes turn to for help, but that staff member could not possibly meet the needs of every family. This experience exemplifies what thousands of immigrant parents and children across the city encounter daily: students left silent and isolated, parents frustrated and excluded, and rights guaranteed on paper but denied in practice.

Now, three years after the influx of recent arrivals, the City Comptroller's 2025 audit makes clear that DOE is still failing to meet its obligations. The changes to Chancellor's Regulation A-663 came directly out of a 2019 federal civil rights lawsuit that exposed a pattern and practice of denying interpretation services in the City's public schools. Families were unable to access essential information about bullying, lead contamination, and even serious medical conditions. The City's response to the migrant arrival surge, Project Open Arms, invested \$27 million to expand the number of bilingual programs. Yet even with this funding, many schools that received money still had [no bilingual educator](#) two years later.

Today, nearly half of ELL students in the Comptroller's [audit](#) sample did not receive the legally required instructional minutes or courses. 40% of students were taught by uncertified teachers (p.12). The DOE filed 146 improper waivers to avoid creating bilingual programs, disproportionately harming Russian, Bengali, Arabic, Uzbek, Haitian-Creole, and



Spanish-speaking students, the last of whom make up two-thirds of all ELLs. These are not oversights, but clear violations of Chancellor's Regulation Part 154.

The legislation before the Council today addresses these challenges in important ways:

- **Int 1336-2025** would ensure that language access in schools doesn't stop at the classroom door but extends to every part of a child's education, including their health and safety. Families cannot support their children if notices about vaccines, asthma treatment, mental health supports, or even school safety are only in English. Too often, immigrant parents are misinformed about the issues that directly affect whether their child shows up to school healthy, ready, and able to learn. This legislation ensures that vital public health information is translated into the languages families speak, reducing absenteeism, and protecting students;
- **Int 1337-2025** is critical as it would ensure that immigrant families receive accurate, timely public health information in their primary languages. The bill would require city agencies and schools to proactively translate and disseminate notices on health and safety, on vaccinations, infectious disease outbreaks, air quality alerts, or mental health resources, into the top languages spoken by New Yorkers. By mandating linguistically accessible communications, Int 1337 would directly combat the spread of misinformation in immigrant communities. Without multilingual outreach; and
- **Resolution 54-2024**, which calls on the City and State to expand the pipeline of certified bilingual educators and staff, so schools can stop relying on improper waivers and temporary fixes. The absence of certified bilingual teachers has serious consequences. The City Comptroller's audit found that when students are not taught by certified bilingual teachers, the quality of instruction suffers,



services for ELLs are less effective, and students' English development and overall academic achievement are put at risk. When DOE fails to provide these programs, it is not only breaking the law, but it is also holding back children's futures.

We urge this Council to immediately pass **Int 1336-2025**, **Int 1337-2025**, and **Resolution 54-2024**, including advancing legislation to codify oversight into law by requiring DOE to disaggregate and publicly report data on language access requests and fulfillment rates, so families and advocates can see where schools are falling short, and introduce a resolution calling on Albany to pass the Language Access Expansion Act (A.4875/ S.5535) which would expand enforceable statewide standards and oversight across all agencies to ensure compliance. The act would close the loopholes that allow agencies like DOE to claim compliance while families still go without services, and it would guarantee accountability across every level of government. At a time when the federal government and the Department of Justice are seeking to dismantle language access protections, maintaining and expanding legal protections is critical.

We also urge the Council to address the bilingual teacher pipeline crisis. The DOE's own initiatives, such as the [Extended Certification Opportunities](#) program for teachers and the [Bilingual Pupil Services](#) program for paraprofessionals, demonstrate what is possible when the City invests in growing bilingual educator capacity. But these programs are far too limited for a system serving more than [168,000](#) multilingual learners. Districts continue to claim they cannot find bilingual educators, yet teachers are not incentivized to pursue certification, and for some languages, certification exams do not even exist. The Council can help fix this crisis by expanding and strengthening pipeline programs so every student can access a certified bilingual teacher.

Ultimately, the question today is not whether immigrant families have rights. The



question is whether DOE will finally meet its obligations, and whether the Council will continue to enforce them. No child should sit silent and scared in a classroom because they do not understand their teacher. No parent should be left without answers for their child's education because they do not receive school communication in their preferred language. And immigrant families across this city must not be robbed of the opportunities the law already promises them.

Submitted by:

Yasmin Naji
Manager of Early Childhood & Education Policy
New York Immigration Coalition (NYIC)



Testimonial Letter to the New York City Council Committee on Education

Hon. Rita Joseph, Chair

September 30, 2025

Thank you to the chair and city council members for your time today. My name is Brooke Edwards and I am a speech-language pathologist testifying on behalf of the nonprofit organization, SAY: The Stuttering Association for the Young. I hope to demonstrate the need to include our students who stutter in the conversation of improving language accessibility in NYC public schools.

Stuttering is a complex and often-misunderstood communication difference that occurs due to variations in the neurological pathways involved in speaking. Stuttering is characterized by interruptions in the flow of a person's speech that may vary across time and situations. Stuttering is not an emotional disorder but might cause a child to experience feelings of shame, anxiety or discomfort about their speech. Some children may exert a lot of energy switching words, shortening their message or even not speaking at all to conceal the fact that they stutter. These variable and sometimes covert characteristics often lead to schools overlooking the needs of students who stutter.

At SAY, we run a sleepaway camp, speech therapy & family sessions, creative arts programming, and professional trainings, all with the mission to build a community of acceptance and encouragement for children who stutter. Our schools **MUST** be a part of this community. Unfortunately, there is a growing body of research that shows that both teachers and school-based speech therapists consistently report a lack of confidence about their training on stuttering (Gabel, 2013; Kelly et al., 2020; Plexico et al., 2013; Tellis et al., 2008). At SAY, we hope schools improve trainings so that students who stutter receive the time, respect and accommodations that they deserve.

A SAY participant wrote "Because I could never string a sentence of words together without stumbling . . . I was without a voice. My opinion was never heard and my . . . beliefs and feelings were forced to stay in the recesses of my mind. Then I found theater." It was SAY's theater program that provided him space to share his authentic voice. With proper training, teachers and other school staff members can be empowered to do that for countless other children as well.

Thank you, Council, for your openness to seeing stuttering through the lens of neurodiversity and ensuring stuttered voices are accepted and accommodated for in NYC public schools.

Brooke Leiman Edwards MA, CCC-SLP, BCS-SCF

Board Certified Specialist in Stuttering, Cluttering and Fluency Disorders

Ally of Stuttering™

Director of SAY:Speech

SAY: The Stuttering Association for the Young

www.say.org

(646) 403-3519



*Please see attachments for more information on the educational and support-based programs SAY offers children and teens who stutter and the professionals who work with them!

References:

Gabel, R. M. (2014). School speech-language pathologists' experiences with stuttering: An Ohio survey. *eHearsay*, 3(3), 5-29.

Kelly, E. M., Singer, C. M., Henderson, J. K., & Shaw, K. O. (2020). Stuttering practice self-assessment by school speech-language practitioners. *Language, speech, and hearing services in schools*, 51(4), 1156-1171.

Plexico, L. W., Plumb, A. M., & Beacham, J. (2013). Teacher Knowledge and Perceptions of Stuttering and Bullying in School-Age Children. *Perspectives on Fluency and Fluency Disorders*, 23(2), 39-53.

Tellis, G. M., Bressler, L., & Emerick, K. (2008). An exploration of clinician's views about assessment and treatment of stuttering. *Perspectives on Fluency and Fluency Disorders*, 18(1), 16-23.



PROFESSIONAL SUPPORT FROM SAY

Stuttering is a complex and often-misunderstood communication difference that impacts over 80 million people worldwide. It is not easy to define because it looks different in each person and can even fluctuate across time and situations. Not all aspects of stuttering are visible and some people who stutter may experience feelings of shame, embarrassment or frustration. This might lead to a person switching words, shortening their message or even not speaking at all to conceal the fact that they stutter. **SAY: The Stuttering Association for the Young** was founded to help children and teens who stutter build confidence in their voice. To do this, we must help our community to understand stuttering and to learn how to be better listeners.

A SAY participant wrote **"Because I could never string a sentence of words together without stumbling...I was without a voice. My opinion was never heard and my...beliefs and feelings were forced to stay in the recesses of my mind. Then I found theater."** It was SAY's Confident Voices program that provided him space to share his authentic voice. With proper training, teachers and other school staff members can be empowered to do that for countless other children as well.

Whether you are a **speech-language pathologist (SLP), day care provider, teacher, guidance counselor, school administrator or other professional**, SAY is dedicated to helping our community better understand stuttering and evidence-based stuttering therapy & resources. Professionals can connect with SAY staff via phone/zoom consultations, peer group learning opportunities, school presentations, school partnerships and more. Please contact **Brooke@say.org** if you are interested in learning and collaborating with SAY!

PHONE/ZOOM CONSULTATIONS

SAY: The Stuttering Association for the Young invites daycare providers, teachers, guidance counselors, school administrators and other professionals to contact us with questions about stuttering and how to support your students. Whether you are unsure if one of your students is truly stuttering or you're looking for advice on how to make the proper accommodations in the classroom for your student who stutters, we're here to help! Contact **Brooke@SAY.org** to schedule a consultation.

INTERVISION FOR SPEECH LANGUAGE PATHOLOGISTS

SAY: The Stuttering Association for the Young invites speech language pathologists (SLPs) across the world to our FREE bi-monthly virtual peer mentorship group called "Intervision." At Intervision, SLPs of all levels of knowledge and experience with stuttering therapy gather via Zoom to share and learn from one another through case presentations and breakout discussion groups. Undergraduate and graduate students are invited to contact the host to volunteer to observe and help at meetings. Certificates of attendance will be provided for 1 **professional development hour (PDH)** to all certified SLPs!

Hosted by Brooke Edwards MA, CCC-SLP, BCS-SCF
For questions or volunteer opportunities, contact **Brooke@SAY.org**



SCHOOL PRESENTATIONS

SAY: The Stuttering Association for the Young offers interactive school presentations (30–120 minutes) designed to raise stuttering awareness and create more supportive, inclusive learning environments. Through stories, activities, and open dialogue, students and educators gain tools to better understand stuttering and support young people who stutter. Presentations are available throughout NY, NJ, CT, and PA, with priority given to schools in these regions.

SAY: SPEECH'S SCHOOL-BASED SPEECH THERAPY OUTREACH PROGRAM

SAY: The Stuttering Association for the Young invites the speech therapy departments of public schools to partner up and enhance your knowledge and support of the students who stutter in your district. The outreach program provides FREE and accessible resources and support specifically for school-based speech pathologists working with students who stutter in the public school system. Depending on the level of programming agreed upon, your staff will be provided with access to resources such as:

- A live or recorded webinar that focuses on the foundations of providing evaluations and treatment for students who stutter
- Clinical resources (ex. informative hands outs and templates for evaluating or providing stuttering therapy)
- 1:1 monthly "office hours" for clinicians to meet with a board-certified stuttering specialist

How does a school district take advantage of the SAY: Speech School-Based Speech Therapy Outreach Program?

The program requires very little time or resources from the school district itself. SAY: Speech will independently develop and maintain all resources or "office hours" registrations. This program was piloted with the New York City Department of Education and is open to expanding to a school district near YOU! School districts can easily obtain more information about this outreach program by contacting the director of SAY: Speech, Brooke Edwards MA, CCC-SLP, BCS-SCF, to inquire if the program is currently accepting new school districts. For questions contact **Brooke@SAY.org**.



ABOUT SAY

SAY: The Stuttering Association for the Young is a national 501(c)(3) non-profit organization that provides support, advocacy, and life-changing experiences for young people who stutter, ages 3-18. For over 20 years, SAY has offered comprehensive and innovative programs that address the physical, social, and emotional impacts of stuttering. Through summer camp, regional day camps, speech therapy, and creative arts programming, SAY builds a community of acceptance, friendship, and encouragement where kids and teens who stutter can develop the confidence and communication skills they need to thrive.

OUR COMMITMENT

SAY is dedicated to serving children who stutter from all socioeconomic backgrounds, regardless of financial constraints. We are committed to breaking down barriers to participation, which is why our school-year programming is offered FREE of charge.

Visit our website: www.say.org

Contact us: info@say.org


Follow us on social media: [@sayorg](https://www.instagram.com/sayorg)



Scan here for more info.



Creative Programs for Young People Who Stutter

A close-up portrait of a young boy with dark hair and eyes, resting his chin on his hand. The background is dark and out of focus. A teal horizontal bar is at the bottom of the image.

Reuben, age 10

“

SAY brought Reuben out of his shell, and in addition to building self-confidence, Reuben has made so many new friendships.”

— Maria, Reuben’s Mother

ABOUT US

For over 20 years, The Stuttering Association for the Young has provided support, advocacy, and life-changing experiences for young people who stutter. Through summer camp, regional day camps, speech therapy, and creative arts programming, SAY builds a community of acceptance, friendship, and encouragement where young people who stutter can develop the confidence and communication skills they need to thrive.

OUR MISSION

To empower young people who stutter and inspire the world to treat them with compassion and respect so they can achieve their dreams.

HOW WE HELP

Over 80 million people in the world stutter, including 5% of all children. Young people who stutter often face unimaginable fear and cruelty from a world that doesn't understand them. Over time, they may recoil from the world, silencing themselves to hide their stutter, embarrassment, and shame. Young people who stutter may also feel incredibly isolated and alone, and many face daily ridicule, teasing, and bullying.

Since 2001, SAY has offered comprehensive, innovative programs that address the physical, social, and emotional impacts of stuttering. So many incredible children have come to our programs in despair. Their courage has lifted us, and we have witnessed the transformation that occurs when children who stutter develop the self-confidence, lasting friendships, and support they need to express themselves fully and freely. We believe that every young person who stutters has a voice that deserves to be heard.

SAY programs are free or offered on a pay-what-you-can basis. To date, no child has ever been turned away from SAY's programs due to financial limitations.

FOUNDER'S MESSAGE



I believe every voice matters. Not some. Not most. Every voice.

— **Taro Alexander**
SAY Founder and CEO



Every day, kids who stutter shut down. How many silent kids, hiding in the back row of class, are actually brilliant — just pretending not to know the answers because they're afraid to talk? How many young people are keeping their heads down or not making friends because they are terrified of being laughed at, ridiculed, or bullied for the way they speak?

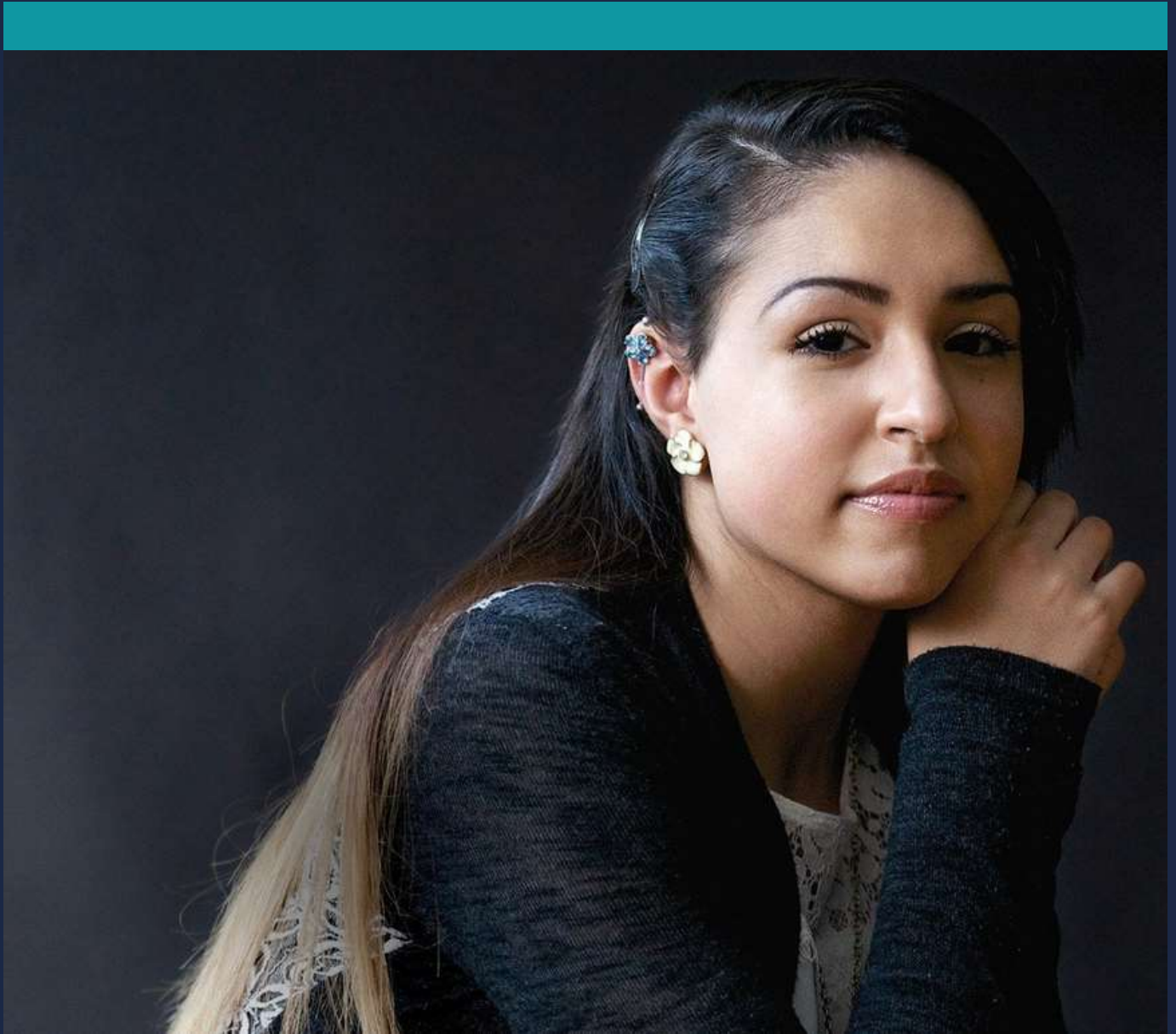
For years, I lived this way myself. I have stuttered since I was five years old, and I wish there had been an organization like SAY when I was a child. For much of my life, from the moment I woke up until the moment I fell asleep, my number one goal was to hide the fact that I stuttered. Of course, the best way not to stutter is not to talk. And I did a lot of not talking. I did a lot of watching the world from the sidelines, desperately wanting to throw myself into the game, but allowing fear to win out more times than not. I started SAY to reach out to young people who might otherwise never know the reassurance and relief of connecting with another person who stutters. I started SAY to affirm that every voice matters, to help parents know that being an effective communicator is more important than being 100% fluent.

I started SAY to make the world listen, to inspire even the quietest amongst us to embrace their voice and dreams. Seeing a child give up on communicating is a tragedy that we don't accept at SAY. Our dream is that each and every child will live out of courage instead of fear. Our expectations are high. We believe that young people who stutter can achieve whatever they dream of.

“

SAY helped me develop the self-esteem necessary to find my own voice. Thanks to SAY, I now live each day with more confidence - whether it's speaking in class or singing an original song - it's been so life-changing.”

— Julianna, age 16



CAMP SAY

Join us at Camp SAY, the exciting summer camp where everything seems possible for a young person who stutters, where they develop the skills they need to communicate more effectively, build self-confidence, and forge friendships to last a lifetime.

Camp SAY is an American Camp Association (ACA)-Accredited, 2-week, sleep-away summer camp for young people who stutter, ages 8-18. Young people from across the country and beyond attend Camp SAY year after year.

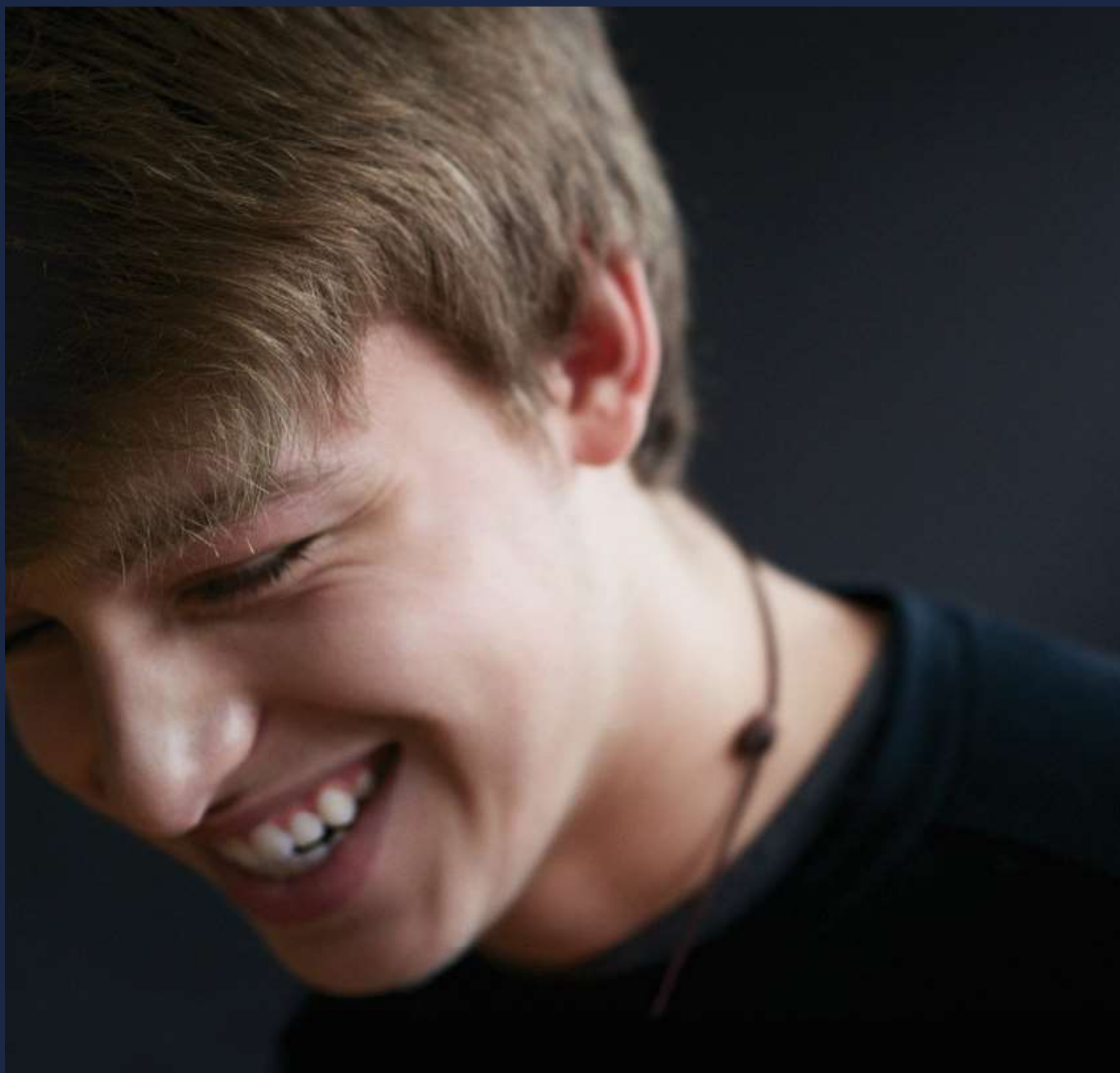
THE SUMMER OF A LIFETIME

Each day at camp provides an essential balance between structured activities and choice, so children can discover their unique talents and enjoy the freedom of pursuing their personal interests and dreams. Campers spend time with children their own age and are also paired with camp buddies, so that older and younger campers can enjoy a rewarding mentoring experience.

In addition to having incredible fun, kids and teens leave Camp SAY with many meaningful and lasting benefits, including increased confidence, new friendships, greater independence, and the feeling of being much better prepared to begin a new school year.

At Camp SAY, campers are welcomed by friendly staff and fellow campers who stutter and immediately see that Camp SAY is a very different place where they are free to express themselves without fear or ridicule. Camp programs and activities are specially designed to meet each child's individual goals and needs. We offer sliding scale rates for Camp SAY. No child has been turned away from our programming due to a family's inability to pay. **Learn more about the camp experience at CampSAY.org.**





“

"I love Camp SAY because I make friends from across the country that I stay in touch with all year long - which is awesome."

— Joe, age 18

SPEECH THERAPY

SAY: Speech provides customized, comprehensive speech therapy to help young people who stutter improve communication skills, build self-esteem, develop greater independence, increase academic and social skills, and advocate for themselves.

THE SAY APPROACH

SAY's speech therapy program is led by speech-language pathologist and board-certified stuttering specialist Brooke Leiman Edwards, MA, CCC-SLP, BCS-SCF. We currently offer teletherapy to families all over DC, MD, and NY, from the onset of stuttering through 18 years of age. Our holistic approach to therapy addresses the individual needs and goals of each child and family and incorporates education & advocacy, fear & avoidance reduction, physical strategies to make speaking easier, family & community integration, and a focus on overall communication skills.

We provide a unique depth of expertise because we are fully dedicated to addressing the challenges of stuttering and helping kids and teens build communication skills, increase self-esteem, develop independence, and enjoy more dynamic school and social participation. **Sliding scale fees are available** so that every child has access to SAY: Speech.

Our comprehensive services include informative consultations and referrals, diagnostic evaluations, individual and group teletherapy sessions, parent support & networking groups, consultations with other service providers, and other professional resources and outreach. Our services help young people become more confident at home, school, work, and in their community. Sessions provide a fully accepting environment where kids and teens safely share their thoughts and fears and develop a plan that leads to successful and joyful communication.

Learn more about speech therapy at
[SAY.org/programs/sayspeech](https://say.org/programs/sayspeech)

CONFIDENT VOICES

SAY developed its ground-breaking Confident Voices weekend arts program to help young people who stutter develop the confidence and courage they need to communicate more effectively, build a sense of community, and establish rewarding friendships. This program is offered free of charge.

SHARE YOUR VOICE

Our Confident Voices program helps young people who stutter, ages 8-18, develop essential skills and enjoy a unique forum to freely express their thoughts, ideas, goals, and dreams. This program occurs every Saturday, in-person in New York City.

By utilizing a broad range of practical program formats that build communication skills and self-confidence, our dynamic staff helps kids and teens safely expand their comfort zones. Tapping into each child's strengths and interests, SAY creates a highly individualized experience that generates profound results. Powerful peer collaborations also enable young people who stutter to establish strong support groups and forge important new friendships.

Since 2001, Confident Voices has helped young people who stutter develop a crucial support network. Led by SAY's Artistic Director, Travis Robertson, and Programming Associate Danielle Leneé, kids and teens build life-long bonds and friendships, with the opportunity to continue and create new connections each season.

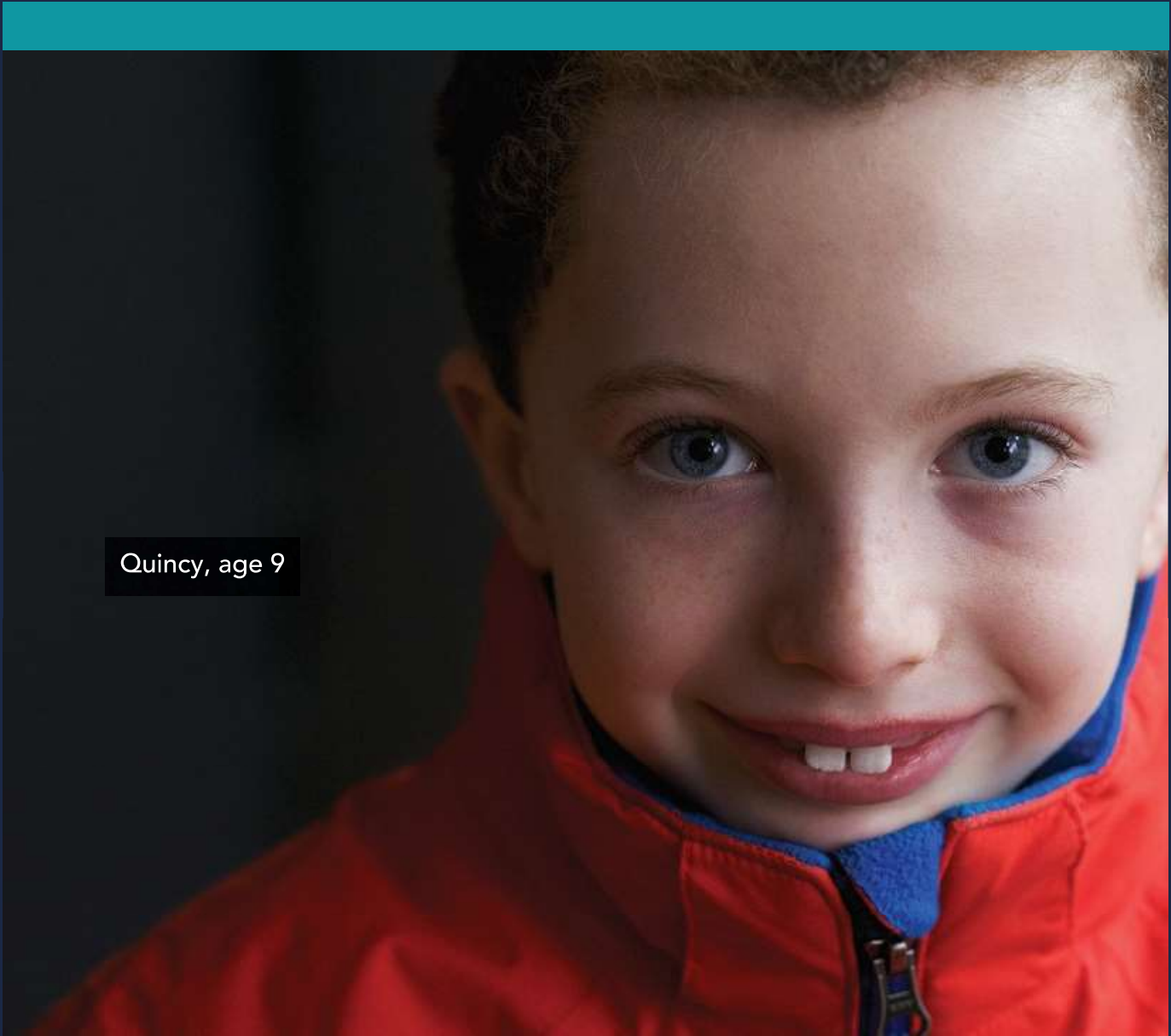
As each program culminates, participants have the chance to present their projects to family and friends, sometimes in an off-Broadway theater. It's this unique experience, delivered in an accepting and supportive environment, which allows many young people to express themselves fully for the first time in their lives.

Learn more at [SAY.org/programs/confidentvoices](https://say.org/programs/confidentvoices)

“

Quincy is a self-confident, eager, and proud student as a result of his participation in SAY's Confident Voices program for the past several years.”

— Rachel, Quincy's Mother



Quincy, age 9

SAY: DC

SAY: DC programs leverage the power of listening, art-making, and community to open up new worlds of possibility for each participant.

SAY: DC is a free, mixed-age, weekly creative arts program focused on self-expression, collaboration, and connection for ages 5-18.

THE POWER OF THE ARTS

At SAY, we believe the arts are for everybody. Here, young people can feel free to explore new modes of expression in a safe and supported context. At the forefront is our trust in the power of listening and the inner strength that comes from nurturing supportive friendships. When you know your friends truly understand and empathize with you and have your back, you can do anything.

SAY: DC happens every Saturday at our studio in Washington, DC. Located on Rhode Island Avenue NW, these “Clubhouse” gatherings are offered 100% free of charge. All project materials are provided.

At Clubhouse gatherings, we come together to create a community of fun, support, creativity, and imagination. With the guidance of SAY: DC Co-Founder and Director, Leigh Pennebaker, and a team of accomplished Teaching Artists, participants explore a variety of approaches to making art. We emphasize increasing confidence, maximizing joy, unleashing curiosity, and inspiring collaboration. Over the course of the year, projects will incorporate creative writing, printmaking, sculpture, painting, mixed-media, drawing, creative movement, games, textile art, jewelry-making, acting, and improvisation. The Clubhouse creates a supportive haven to make new friends and explore self-expression in a caring, safe environment.

Learn more at [SAY.org/dcprograms](https://say.org/dcprograms)

THE MY STUTTER PROJECT

The My Stutter Project offers a brave online space for young people who stutter to make friends with others who understand what they're going through. They'll use this creative outlet to share their stories and learn new ways of advocating for themselves. This online program offers community, support, and creative workshops for young people who stutter worldwide.

This program is open to all young people who stutter, ages 8-18. There is no charge to participate; all you need is an internet connection. At this time, all sessions will be led in English.

JOIN A GLOBAL COMMUNITY

Over the course of the program, The My Stutter Project offers weekly Zoom sessions that blend creative arts, personal storytelling, and skill-building to help each participant find their voice in a supportive, nurturing environment.

Led by SAY's Artistic Director, Travis Robertson, and Programming Associate Danielle Leneé, The My Stutter Project curriculum is rooted in a deep understanding of the needs of young people who stutter. We believe in using the Arts to ignite the power of deep listening, connection, support, and self-expression. We are committed to creating a fun, inspiring virtual environment where participants feel empowered to express themselves and have as much time as they need to speak.

At the culmination of the program, participants showcase their artistic work and presentations to an audience of friends and family. This final gathering celebrates their talents and stories while reinforcing the connections and confidence they have built throughout the program.

Learn more at [SAY.org/mystutterproject](https://say.org/mystutterproject)

say.org

SAY: PARENTS

An integral part of empowering and creating a supportive community for our children and teens, is ensuring their parents and caregivers are empowered and have a supportive community as well. SAY has always strived to create programs that provide a brave and safe space for children and teens to meet on a consistent basis to learn and grow, and now we're excited to announce we're creating that environment for parents and caregivers as well.

Join our free monthly parents' and caregivers' group and find a community of loved ones who are asking tough questions, sharing their highs and lows, and building their confidence in becoming their child's best advocate and ally!

JOIN A COMMUNITY OF SUPPORT

This is a welcoming space to connect with others, learn, and feel supported. You'll leave feeling more informed, empowered, and part of a strong community. Each month, our very own Director of SAY: Speech, Brooke Leiman Edwards, MA, CCC-SLP, BCS-SCF, will host with special guest co- hosts, including our Founder, Taro Alexander, our Artistic Director, Travis Robertson, our Development Manager, Kate Detrick, and many more! There is no commitment, just register for the months you want to attend to receive your Zoom link.

Learn more about this monthly group at [SAY.org/parents](https://say.org/parents)

OUR ADVOCATES

Joseph R. Biden Jr.

46th President of the United States & person who stutters

"Growing up, I struggled with stuttering and understand firsthand the anguish, frustration, and anxiety that this common speech disorder inflicts on young people. I hope that every child who stutters has the opportunity to benefit from SAY's program and that others will support this vital organization."

Paul Rudd

Actor & SAY Trustee

"To see these kids get in front of an audience and speak, which is difficult for anyone, is incredibly moving. What they do just speaks to the power of joining a group and gaining confidence."

George Springer

Professional Baseball Player & SAY Spokesperson

"Some people have blue eyes, some have yellow hair, and some people stutter. I've never let it hold me back, and with SAY, I want to help kids who stutter build the confidence they need to pursue their own dreams."



Manifesto

SAY what's in your heart.

SAY what's on your mind.

SAY what you want to say.

SAY the story you want to tell.

SAY the things you want the
world to know about you.

SAY the things you want the
world to hear.

Because in the end, what you have
to SAY, not only says a lot about
you, it says a lot about all of us.

We're here to help you SAY the
things that shouldn't go unsaid.





SAY: The Stuttering Association for the Young is a leading national nonprofit dedicated to supporting young people who stutter and their families. Through summer camps, regional day camps, speech therapy, and creative arts programming, SAY fosters a community of acceptance, friendship, and encouragement where kids and teens who stutter can build the confidence and communication skills they need to thrive. We offer sliding scale rates for Camp SAY and SAY: Speech, and **all other programs are free.**

To date, no child has ever been turned away due to financial limitations. Visit say.org/programs to learn more.

The Stuttering Association for the Young is a non-profit 501(c)(3) organization. Donations are tax-deductible to the fullest extent permitted by law.



Email Us

Info@say.org



SAY Admin Office

333 West 39th Street, Suite 604

New York, NY 10018

212-414-9696



Website

[SAY.org](https://say.org) | [CampSAY.org](https://campsay.org)

Connect with us:



@SAYorg

TESTIMONY

New York City Council
Committee on Education
Oversight – Language Access in Public Schools
September 30, 2025

Submitted by:
The Legal Aid Society

The Legal Aid Society welcomes the opportunity to testify and thanks Chairs Joseph and Hanif and the City Council for their leadership on English Language Learners in New York City Public Schools.

Throughout our more than 145-year-history, The Legal Aid Society (LAS) has been a tireless advocate for those least able to advocate for themselves. Our mission is simple: we believe that no New Yorker should be denied their right to equal justice because of poverty. LAS annually provides legal assistance to low-income families and individuals in more than 250,000 legal matters involving civil, juvenile, and criminal matters, including education advocacy for school-age children and youth. The Civil Practice provides advice, training, and representation that benefits more than 100,000 New Yorkers each year. Our work ensures that our clients can earn a living wage, have a place to sleep, and can care for themselves and their families. The Juvenile Rights Practice handles more than 20,000 matters each year, representing over 90% of the children who appear in New York City's Family Court through juvenile justice or child protection cases. Our work with these most vulnerable New Yorkers keeps them safe and makes our city's families and communities stronger. The Criminal Defense Practice is the premier public defender program in the country, handling 125,000 criminal matters in a typical year. Our victories in and out of the courtroom protect the constitutional rights of our clients and strive for greater humanity in the criminal legal system. Our Civil, Juvenile, and Criminal Practices engage in educational advocacy for our clients, in the areas of special education, school discipline, and school placement and programming. In addition to representing these children each year in administrative hearings, appeals, and court proceedings, we also pursue impact litigation and other law reform initiatives on behalf of our clients.

Our perspective comes from our daily contacts with children, youths, and their families as well as our frequent interactions with courts, social service providers, and NYC agencies including the Departments of Education (DOE), Health and Mental Hygiene (DOHMH), and

Homeless Services (DHS); the Administration for Children's Services (ACS), and the Human Resources Administration (HRA). Collaboration within LAS practices, including the Homeless Rights Project, Health Law Unit, Immigration Law Practice, and the Education Law and Education Advocacy Projects, ensures that we approach resolving our young clients' barriers to education from a multidisciplinary perspective.

Oversight - Language Access in NYC Public Schools

The recent Comptroller's Report on English Language Learner (ELL) programs and services paints a stark and unacceptable picture of the state of multilingual education in New York City. In the 2023–2024 school year, nearly 174,000 students in New York City public schools were identified as English Language Learners. These students come from families speaking more than 150 languages with Spanish, Chinese, Arabic, Russian, and Bengali being the most common. State and federal law guarantee these students timely identification, placement, and access to appropriate programs, including bilingual and English as a New Language (ENL) instruction delivered by certified teachers. However, about 48 percent of ELL students did not receive the required instructional time or courses, and approximately 40 percent were taught by teachers who lacked the necessary bilingual or ENL certification. Year over year, the DOE's use of waivers increased by 35% between 2021-2022 and 2023-2024, primarily with respect to Russian, Bengali, and Arabic speakers. Moreover, newly enrolled students were not consistently assessed through the NYS Identification Test for English Language Learners.

These failures are not mere administrative oversights; instead, they constitute a systemic denial of rights guaranteed under state and federal law. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on national origin, which includes language-based discrimination. In *Lau v. Nichols*, the Supreme Court held that failing to provide language assistance to non-English speaking students denies them a meaningful education in violation of Title VI. New York State Commissioner's Regulation Part 154 codifies these principles by requiring timely

assessment, mandated instructional units, and services delivered by appropriately certified bilingual or ENL teachers. The DOE's failures, as documented by the Comptroller, therefore reflect ongoing violations of both federal and state obligations.

While all eligible students are entitled to ELL services, many of the most vulnerable – those with disabilities – are also the most negatively impacted by inadequate provision of language programs. During the 2023-2024 school year, only 42% of students requiring bilingual classrooms (integrated coteaching and special class) and Special Education Teacher Support Services (SETSS) were fully served. While the numbers look better for students requiring bilingual speech and language therapy, still, 16% were not fully served in 2023-2024.

The consequences of these failures are profound. Students who are denied required services fall behind not only in English language learning but also in all academic subjects taught in English, which impacts graduation rates, college readiness, and long-term opportunities. Families are frequently left without critical information in their native language, undermining their ability to advocate effectively for their children. However, the consequences are not confined only to these students' own communities, they ripple outward and impact the city as a whole. If these students are not equipped with the skills they need to succeed academically and professionally, the entire workforce suffers from a loss of talent and innovation, and businesses struggle to meet the demands of an increasingly diverse economy. Public systems also bear the burden because it creates higher unemployment rates and an increased dependence on social services.

We acknowledge that to some extent, the failure to adequately identify, track, and serve eligible students stems from shortages of certified teachers and other staff. NYCPS must cast a very wide recruiting net if it intends to reach complete fulfillment of its ELL obligations. We therefore fully support Resolution 0054-2024 urging NYCPS and NYSED to collaborate on efforts to recruit additional teachers.

We thank the Education Committee for considering this testimony.

SUSAN J. HORWITZ
Director, Education Law Project
Civil Practice

MELINDA ANDRA
Attorney-in-Charge, Education Advocacy
Project

SHANA NAUMBERG
Legal Intern

The Legal Aid Society
49 Thomas Street
New York, NY 10013

Support for Reso 54

Thank you for putting together this resolution urging for more staff qualified to work with English language learners. I am a parent of a middle school child in district 30. She has been in a dual language program since kindergarten. She has benefited a lot from being in this program. We enrolled in the dual language program to provide our daughter with enrichment. She has had a bilingual teacher throughout her time in this program for each class, but I want to share the experience of a child and parent who are fairly new to New York and are both are English language learners.

This child was placed in a monolingual English class with a monolingual English speaking teacher. Because the child has limited English language understanding, it was difficult for her to follow class instruction or participate in class. She was a third grader at the time this parent shared her story with me.

The child experienced bullying from her peers and was unable to communicate this with her teacher, mom tried communicating the situation to the teacher and wasn't accommodated with proper translation. The teacher's response to the parent was that she spoke little Spanish and continued speaking to mom in English. On a separate occasion the child tried explaining to the teacher of another incident and the teachers response was that she was lying. The teacher should have not responded in this way but the reason she did was mainly because she couldn't understand what the child was saying and there was no effort from the teachers part to try and understand.

Mom expressed how the child changed how she felt about school, lost trust in her teacher and did not want to continue going to school. There should be more accountability within DOE, to ensure children are in spaces that will allow them to grow and succeed in their studies.

We need more bilingual teachers in order to support our growing English language learning students. Experiences like this one contribute to the chronic absenteeism we currently have happening within our schools.

Thanks for reading my testimony.

Marlene Rossi

From: [Qingxia Zhu](#)
To: [Testimony](#)
Subject: [EXTERNAL] Language Access Is Educational Equity.
Date: Monday, September 29, 2025 1:41:27 AM

Good afternoon, Members of the City Council,

My name is Qingxia Zhu. I am a mother of two children and the English Language Learners Representative for the District 15 Community Education Council. Thank you for giving me the opportunity to speak today.

My daughter was born prematurely at just 24 weeks, weighing a little over one pound. As a new immigrant who spoke no English, I felt completely helpless. When she started school at age three, she needed speech therapy. But the school had only one speech therapist with a full caseload, and my daughter received no services her first year. External agencies were overwhelmed, and we had to wait another year before therapy could begin, further delaying her language development.

This is not just a problem for my family. Many parents of English Language Learners, children with IEPs, and immigrant families face the same challenges. Data I collected from my daughter's preschool shows that several children did not receive timely language interventions. Securing services for a child is already difficult, but without language access, advocacy becomes nearly impossible. Important forms are often provided only in English, and even when interpreters are available, their quality is inconsistent. Parents struggle to understand their children's needs and cannot effectively communicate with schools because of language barriers.

Language access cannot remain words on paper. It must respond to families' real needs. Schools and districts should provide clear, multilingual information, improve the quality of translation services, increase resources for English learners, and ensure timely interventions. Children should not be disadvantaged due to lack of resources or communication barriers, and all families should be able to participate equally in education.

Thank you all for listening.

Good afternoon. I'm here today on behalf of families who cannot file complaints about their children's bus service — because OPT does not provide language support.

Families tell me the same thing again and again:

- *The buses are late.*
- *The routes are too long.*
- *The IEPs are not being followed.*

And yet — they cannot speak to you, because you do not speak their language.

One mother told me her child's two-plus-hour one-way bus ride was "good enough." She begged me not to file a complaint — because she feared it might get worse. That is the level of fear we are dealing with.

Here are the facts:

- Students are arriving late.
- Students are staying home.
- Parents are getting "no bus today" calls, and they have no way to advocate for their children.

So I have one question for you: **Who is accountable for the \$14 million you awarded OPT to improve their help desk — when there is still barely Spanish support, in a city where 23% of residents speak Spanish at home? When there is no Chinese support, in a city with over 628,000 Chinese New Yorkers — more than half of whom report limited English proficiency? When nearly half of all New Yorkers speak a language other than English at home?**

This is New York City. A city of immigrants. Yet our families cannot speak to OPT, and our children suffer.

So I will say it again: **Families cannot complain. Children cannot arrive safely. IEPs are not followed. And no one is accountable.**

Tonight, I urge you to make a clear commitment: **Fix this. Provide real language access. Hold OPT accountable. Our children deserve nothing less.**

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Qingxia Zhu

Address: _____

I represent: CCEC 15

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Taina Wagnac

Address: _____

I represent: ~~NYC~~ New York Immigration

Address: Coalition

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Airenakhue B. Omoragbon

Address: _____

I represent: African Communities Together

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Yves Carmel Valerius

Address: 2348 Flatbush Ave, FL 2

I represent: CWA

Address: 2348 Flatbush Ave, BK, NY 11234

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 9/30/25

(PLEASE PRINT)

Name: Anabel Ruggiero

Address: [REDACTED] Brooklyn NY 11238

I represent: N/A

Address: N/A

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Nat Moaghe

Address: _____

I represent: Asian American Federation

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Kate Di Vasto

Address: _____

I represent: Queens Legal Services

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Tamara DeCherise Lawrence

Address: 411 NYCP

I represent: NYCPSS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Tamara DeCherise Lawrence

Address: _____

I represent: NYCPSS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Andie McCarroll

Address: _____

I represent: NYPRS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Er Cristina Melendez

Address: _____

I represent: NYCPS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Kleber Palma

Address: _____

I represent: NYCPS

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Kyle Edward D'Amico

Address: _____

I represent: NYCPBS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: Sept. 30, 2025

(PLEASE PRINT)

Name: Stamo Rosenberg

Address: 40 Rector St. NYC

I represent: CSA - First Vice President

Address: 40 Rector St. NYC

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: 9/30/25

(PLEASE PRINT)

Name: Aimee Lichtenfeld

Address: _____

I represent: NYCPBS / DCHM+1

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 9/30/25

(PLEASE PRINT)

Name: David Tepel

Address: _____

I represent: NYCPS / DOHMH

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Anna Pons

Address: _____

I represent: NYCPS ✓

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Sasha Bernhard

Address: _____

I represent: NYCPS / DOHMH

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Language Access Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Nat Moghe

Address: _____

I represent: Asian American Federation

Address: 120 Wall St NY 10005

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Education - Language Access Date: 9/30/25

(PLEASE PRINT)

Name: Rita Rodriguez Engberg

Address: 151 W 30th St 5th Fl NY NY 10001

I represent: Advocate for Children of NY

Address: 151 W 30th St 5th Fl NY NY 10001

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Dina

Address: _____

I represent: CWA

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 50

☒ in favor ☐ in opposition

Date: 9/30

(PLEASE PRINT)

Name: Ashwyn Lu-Heda

Address: _____

I represent: ASAP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 50

☒ in favor ☐ in opposition

Date: 9/30

(PLEASE PRINT)

Name: KULSOOM TAPAL (w/ ASAP)

Address: Students

I represent: CACF

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 50

☒ in favor ☐ in opposition

Date: 9/30

(PLEASE PRINT)

Name: Kyae Sin Linn Lat (STUDENT)

Address: _____

I represent: ASAP

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Concepción Maldonado - Spanish tech

Address: 2770 Third Ave

I represent: Masa / parent

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Christopher Lee Johnson

Address: _____

I represent: Self

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
☐ in favor ☐ in opposition

Date: 9/30/25

(PLEASE PRINT)

Name: Lupe Hernandez

Address: _____

I represent: Myself (NYC Public School

Address: Parent

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Aracelis Lucero - Interpreting for

Address: [REDACTED] Mosa

I represent: Mosa parents

Address: 2970 Third Ave

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Laura Secundo - Spanish testimony

Address: [REDACTED] Bronx NY 10454

I represent: Mosa / parent

Address: _____

Please complete this card and return to the Sergeant-at-Arms