

Testimony of NYC Public Schools on Transfer Schools Before the NYC Council Committee on Education

October 30, 2025

Testimony of John Sullivan, Superintendent of Transfer Schools

Good afternoon, Chair Joseph, and all the Members of the Committees on Education here today. My name is John Sullivan, and I am the proud Superintendent of our Transfer High Schools. I am joined by Joseph Luft, Chief of School Support for High Schools within the Division of School Leadership, and my colleagues in the Office of Student Pathways, and the Division of Inclusive and Accessible Learning. We are pleased to be here today to discuss the work we do in the Transfer High Schools to provide a high-quality education to some of the most vulnerable students in New York City Public High Schools. I thank the City Council for inviting us here today and for your support of Transfer Schools and our students. We thank you Chair Joseph for your continued support and advocacy for our most vulnerable students. I hope to use this time today to show you how Transfer Schools build bridges, not barriers, to education.

I have served in the Transfer District for eight years, beginning my tenure as Deputy Superintendent. Upon the retirement of my predecessor in the spring of 2021, I was appointed Superintendent. Prior to this role, I held positions as a high school principal, network leader, and classroom teacher. Throughout my career, I have been steadfast in my commitment to ensuring that every student has access to the resources, guidance, and opportunities necessary to achieve academic success and personal growth.

Overview of Transfer High School

Transfer High Schools are small diploma-granting high schools that were designed to support high school students in need of an alternative learning environment from the traditional high school setting. Many of the students in Transfer Schools have disconnected from school before they come to a Transfer School. The average Transfer school student comes to the district after spending one to two years in traditional high schools. The average student is 17 to 18 years old, over-aged, and under-credited. They usually have fewer than nine credits and one Regents exam. Students often have attendance issues and are often already considered chronically absent when they arrive at a transfer school.

Prior to 2015, transfer schools were part of their geographical high school districts. This resulted in uneven supports for students with disabilities and English Language Learners, as well as student access to central resources. Transfer Schools only become a citywide district in 2015. Today Transfer Schools are part of key central initiatives such as: NYC Solves, Learning to Work Initiatives, Future Ready, and Project Pivot. As a district, Transfer Schools expanded our work to support English Language Learners, Students with Disabilities, and Students in Temporary Housing. We have built community involvement by establishing advisories that include our students, parents, and principals.

There are a total of 51 Transfer Schools in New York City Public Schools. The Transfer High School District, under my supervision, is composed of 42 schools across all five boroughs of New York City. Five of the schools traditionally have served newcomers and English Language Learners. One school, Harvey Milk High School, traditionally has served members of the LGBTQIA+ community. The Transfer Schools currently serve 8,734 students, including 2,082 (24%) Students with Disabilities, 2,608 (30%) English Language Learners, 1,986 Students in Temporary Housing (23%), and 106 students in Foster Care (.01%).

Through our partnerships with Community Based Organizations (CBOs), Transfer Schools provide our students with the academic, social, and emotional support needed for them to have another chance to be successful in high school. Our CBOs also coordinate the Learning to Work programs, which provide students with work-based learning and internships. Transfer Schools are no longer schools where students go just to finish what they are missing: they offer students a true high school experience, not just the minimum. As my student leaders have proudly stated, Transfer Schools build bridges, not barriers, to education.

Enrolling Students in a Transfer School

Transfer Schools enroll students on an ongoing basis. Students don't need to pass a test to enter a Transfer School but are often referred to one by an adult at their current school. Many of our students also find their way to a Transfer School through the recommendation of a friend or family member who has attended one.

When students come to Transfer Schools for admission, their transcript is reviewed and the student and family is interviewed. For the students to be successful, they need to desire to make a change and a fresh start. As I remind our principals and our assistant principals whenever we gather, students who choose to attend a Transfer School are letting us know that they want a second chance to graduate High School and be successful.

Enrollment is contingent on the age of students. They need to be able to accumulate the 44 credits required to meet graduation standards as well as five Regents exams by their sixth year of high school and by the time they are 21. At times when a student or family feels that a Transfer School is not the right fit, then the principal and the district team will support finding another Transfer School or working with our partners in D79 for enrollment in P2G or GED.

Strengthening Supports for Transfer Schools

As the leader of the Transfer School District, I feel strongly that when students decide to attend a Transfer School, they make a statement that they want a second chance to do better. In the Transfer District, we have a responsibility to support each student who comes to us academically, socially, and emotionally while challenging and pushing them to do their best. Doing the minimum is not a Transfer Schools option.

Under this Administration, we have implemented a number of strategies and initiatives to improve student learning:

Attendance

Student attendance is a strong focus of our district work. Back in 2021-22 immediately after the pandemic, the district attendance rate overall was 56%, including 51% for students with disabilities and 72% for English Language Learners. In 2024-25 our overall attendance rate improved 11 percentage points to 67%. Attendance of our students with disabilities climbed ten points to 61% and five points for our English Language Learners, to 77%.

Compared to their attendance in their previous school, our data shows that students attending Transfer Schools improved by an average of 8.69 points. We also reduced our chronic absenteeism from 84.4% in 2021-22 to 77% in 2024-25 and 68.1% currently.

We're proud of these improvements while recognizing that there's much more work to do. To build on our progress, each Transfer School has an attendance team that meets on a regular basis to monitor and address the ever-changing attendance barriers facing our students. We also share best practices in Transfer schools that have achieved success through such strategies and implemented best practices.

Credit Accumulation and Graduation

As superintendent, my goal is to have all students graduate from high school and be ready for life after receiving their diploma. As a district, we ensure that our schools have programs like advisories, graduation guardians, and weekend and holiday class sessions. To support the non-academic needs of students, our Transfer Schools are staffed with social workers, advocacy counselors, and other highly skilled and trained personnel. Students' programs are tailored to their specific needs. Our data shows that students pass Regents in their first year at a Transfer School at a 28% higher rate than in their traditional school. During the 2024-25 school year, students who entered a Transfer School earned 3.7 more credits than they did the previous year at their traditional school.

Transfer schools stand by their students and give them additional time to graduate. Many of our students come to us after one to two years in a traditional high school and are often behind in credits and essentially pressing a restart button on their High School academic careers. Including students who receive a GED, the Transfer School six-year graduation rate is 61%, including 60% for students with disabilities and 40% for our English Language Learners. The Transfer School Anytime graduation rate, which includes our students who graduate after their sixth year in high school, is 62%, including 60% for students with disabilities and 46% for our English Language Learners.

Through continued monitoring of student progress toward graduation requirements, students can be supported with the option of P2G and GED through District 79.

Advanced Placement Exams and Job Certification Programs

A key part of building bridges is ensuring that students are challenged with opportunities for advanced coursework, not just making up missing credits. We have worked hard to build the Advanced Placement (AP) program in the district. In 2021-22, 176 students in Transfer Schools

took 242 AP exams, with 69 scores of three or higher. In 2025, 505 students took 738 AP exams and 261 scored 3 or higher. Of those AP exams, 67% were taken by students who identify as Latinx and Black. A total of 308 Transfer School Students with Disabilities and 259 English Language Learners took AP classes in 2024-25.

To support students, we have also brought job certification programs into our schools. Our work with job certifications began through conversations with our parent advisory on how we can expand our Learning to Work programs. Our current job certifications are also the result of student input based on career exploration and possible areas of future job interest. The Transfer District in 2024-25 had over 1,850 students engage in 2,450 College/Career experiences. Those experiences include 850 (35%) internships, 315 (13%) career events, 250 (10%) college events/visits, 312 (13%) workforce trainings, 75 (3%) CPR trainings, 77 (3%) OSHA trainings, and 71 (3%) CDOS trainings. Of the students participating, 22% identified as English Language Learners and 22% identified as Students with Disabilities.

Community Empowerment

Feedback and input from students, parents, and principals is not only important to me as the superintendent, but I also see it as an invaluable component to helping the district make progress. I have monthly meetings with students, parents, and principal advisors that provide authentic insight into the distinctive needs, challenges, and successes of our Transfer High School community, ensuring that decisions are grounded in real experiences. By fostering open communication and collaboration, we create a responsive and student-centered approach that strengthens pathways to graduation and postsecondary success.

Supports for Students with Disabilities and English Language Learners

The Transfer District continues to improve the support we have in place for Students with Disabilities and English Language Learners. We have worked with school teams to ensure that Individualized Educational Plans (IEPs) are brought up to date when students join our schools and that the IEP is a living document that is monitored and updated as the students meet the requirements for graduation. Transfer Schools provide students with the opportunity to lead their own IEP review and learn to advocate for their educational needs.

Transfer Schools have seen an increase in English Language Learners in the last three years due to an increase in older student newcomers. We embraced those new arrivals by expanding programs in some schools and opening programs in others. With a limited number of trained ENL teachers, we had to figure out how we could best support our teachers. The District team devised a Professional Learning Program that included Quality Teaching for English Learners (QTEL) training, best practices shared by our ENL teachers across the district, and a mentoring program that teamed experienced ENL teachers with our teachers. Through a grant from DIAL, we were able to partner with the Internationals Network and their schools to provide professional learning to all our principals and in-depth support to the schools in the district with the largest increases in English Language Learners.

Challenges

I have shared areas where Transfer Schools are successful. Areas that continue to be a challenge:

- Working with NYSED on an equitable growth measure to assess the work of Transfer Schools. Under ESSA (Every Student Succeeds Act), Transfer Schools are measured by the same accountability measures as traditional high schools, including the credits students accumulate and the Regents exams that students pass. Under ESSA, Transfer Schools are expected to meet a 67% graduation rate.
- This past year I have been engaging with NYSED Commissioner Rosa's team to review how Transfer Schools are assessed, asking them to consider some growth measurements like improvement in credits, attendance, Regents passes, earning of job certifications and graduation to be considered for future assessment measures of Transfer Schools.
- Especially in the current environment, increasing numbers of English Language Learners and newcomers need to provide support for their families and are choosing to leave high school once their English proficiency is strong enough for them to get a stable job.
- We continue to provide professional development to all of our teachers to best serve our students, but we face a shortage of licensed teachers -- especially teachers of students with disabilities and English Language Learners.

Conclusion

Transfer Schools are committed to ensuring that NYC students have access to a high-quality education. As a district, we will continue to support the most vulnerable students in New York Public Schools, giving them a place to belong, thrive, and learn how to be a productive citizen of the city, state, and country we all live in. The Transfer Schools and I look forward to our continued partnership with the City Council to enhance the educational opportunities and experience of our students who have asked for a second chance.

As a student from Queens Academy stated, "The school offers a program that teaches students about working in the real world, which has been incredibly helpful. I've learned a lot, and my supervisors are kind and supportive. I have an IEP, and Queens Academy has provided everything I need to succeed. They hold regular meetings to track my progress and make improvements when necessary. I feel truly supported."

And as a parent from Concord High School shared with me, "What stood out the most to me was how involved the school was. The texts, emails, and phone calls never stopped; and I'll be honest, at times it felt a little overwhelming! But now I realize it's because the staff truly care. They refuse to give up on their students or let them fall through the cracks. Concord High School didn't just help my kids succeed-- it helped me as a parent feel hopeful again. For that, I will forever be grateful."

Before I close, I'd like to turn to the legislation. Intro 1359 requires NYCPS to report annually on manifestation determination reviews (MDR) conducted for students with disabilities. NYCPS is committed to ensuring that all students, including our students with disabilities, have access to a safe and supportive learning environment. MDRs provide important legal protections for students with disabilities. First and foremost, we aim to ensure that all stakeholders involved understand the process and their roles and rights throughout it. When everyone—school staff,

families, advocates—have the same knowledge and understanding, we can collaborate in equitable and effective ways.

We support the goals of the legislation and welcome an opportunity to add transparency on this issue and thank the Council for its continued leadership. Members of our team would like to speak more with the Council regarding the proposed legislation to ensure that the reporting requirements are consistent with the MDR process and what we are able to capture in our data systems. With Intro 1360, we support sharing information with families on youth programming. We defer to our colleagues in NYPD on the content of the materials.

Chair Joseph and members of the council here today, I personally invite you to join me on visits to our amazing Transfer Schools where you can meet our students, families, and staff, and see our work in action.



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**Testimony of Lara Lai, Senior Policy Analyst and Strategic Organizer for Education
New York City Council Committee on Education Oversight Hearing: Transfer Schools and
Unaccompanied Youth**

October 30, 2025

Good afternoon, Chair Joseph and members of the City Council Education Committee. My name is Lara Lai and I am the Senior Policy Analyst and Strategic Organizer for Education in the Office of NYC Comptroller Brad Lander. Thank you for the opportunity to testify before you today.

Starting in spring of 2022, New York City began to welcome the arrival of tens of thousands of asylum seekers and other immigrants. An often-overlooked population of new arrivals are the unaccompanied young people – generally between 16 and 24 years old who arrived and are now navigating their legal, housing, health, and education needs against the backdrop of an increasingly hostile federal immigration enforcement landscape.

Between January 2022 and January 2024, according to the Department of Youth and Community Development (DYCD) Youth Count survey, the number of homeless youth in New York City nearly tripled from 2,094 to 6,823 with the rise likely due to the increase in unaccompanied immigrant youth.

Although access to public education is a right for any student until the June following their 21st birthday in NYC, some migrant youth have been denied the opportunity to go to school.

Transfer schools, which focus on serving under-credited and overage students, are now an important educational resource for unaccompanied youth with interrupted learning. Although transfer schools do not exclusively serve newcomer students, they offer smaller, more individualized educational settings geared towards older students who would not be able to graduate on time at a traditional school. These schools are generally also more familiar with the housing instability that migrant students face. However, there remain several barriers for students to connect with transfer schools and begin the enrollment process.

First, there are extremely limited transfer school seats and those are reserved for students that schools deem able to graduate by 21. There are only five transfer schools created to support new arrivals and English-learners. In recent years, some transfer schools have made a deliberate effort to expand their ELL services. Brooklyn Frontiers is one such school, but it has only 175 seats in its program of personalized wrap around supports for marginalized students.

Second, transfer schools work on a referral basis, which served its purpose in the past when students were typically referred by their high school counselor if they were in danger of not graduating. But times have changed, and immigrant youth are often in need of enrollment without previous placement in a traditional high school and without a counselor to refer them.



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Newcomer youth must enroll in school at in person Family Welcome Center (FWCs) where advocates have told us that staff are both poorly trained to assist this population of students and unable to provide the needed referrals for transfer schools. Staff do not even track the number of seats available at transfer schools, which makes it even harder for newly arrived students to find appropriate placements. Officially, FWCs accept walk-in appointments, but advocates have reported youth have still been turned away because they didn't have a pre-scheduled appointment or because they did not have a parent with them (which is not required). The New York State Education Department issued guidance in 2016 that districts cannot force students to pursue an alternative educational pathway, such as a GED.¹ Yet we have heard numerous reports that unaccompanied youth have been pushed into GED programs and discouraged from attending high school altogether.

Based on our office's findings from numerous interviews with advocates and school administrators we recommend:

1. Improve access to transfer schools:
 - a. Increase the number of transfer school seats: the City should create new transfer schools to both increase the number of available seats and offer more geographic access.
 - b. Increase funding to transfer schools so that they can support more students and provide ELL services.
 - c. Improve training at Family Welcome Centers: ensure that FWC employees have transfer school seat availability data, are familiar with transfer schools as an option, and are prepared to work with unaccompanied young people who are facing unique educational challenges.
 - d. Allow transfer school enrollment on MySchools: make the enrollment process easier by allowing youth to begin the enrollment process online without having to go to an FWC.
2. Enhance interagency coordination: shelter operators such as DYCD and the Department of Homeless Services (DHS) should work with DOE to increase youth awareness of their right to public school and make the enrollment process easier.

Thank you for holding this important hearing and for your attention to the critical role transfer schools play in New York City. These schools provide a lifeline for at risk students, helping them get back on track toward graduation and opening doors to college, careers, and other post graduate opportunities.

¹ https://www.nysed.gov/sites/default/files/memo_aig_school_age.pdf



BRONX BOROUGH PRESIDENT VANESSA L. GIBSON

**Testimony of Bronx Borough President Vanessa L. Gibson
New York City Council Committee on Education
October 30, 2025**

Good afternoon Chair Joseph and the members of the Committee on Education. Thank you for convening this important hearing today regarding Transfer Schools and how we can best serve our high school scholars.

As a city, we must do more to ensure that all of our students, including non-traditional learners, have the chance to graduate. Our city's 42 transfer schools – including the eight in The Bronx – provide nearly 8,000 students who are over-age and under-credited the opportunity to finish their requirements and graduate with a high school diploma.

Our students drop out of school for many reasons, including health and mental health struggles, family responsibilities, learning challenges, personal and housing instability, and financial hardship. But whatever the reason, these students deserve the chance to get back on track and graduate.

Many of these students accomplish this at the city's transfer schools, which target students ages 16 to 21 and provide personalized instruction in small-sized classes. These schools are open to students who fit certain criteria, including those deemed "at-risk," English-language learners (ELL), and those students who are at least two years behind their peers. This leads to a population that is distinct from the citywide high school population. According to DOE data, 84% of transfer school students are economically disadvantaged and 24% are in temporary housing.

English-language learners in particular make up a large share of transfer school students – 31% according to DOE data, which is significantly higher than across all DOE high schools. ELL students experience specific challenges when it comes to completing their education, especially due to the lack of certified English as a New Language instructors and bilingual educators in our schools. With an influx of migrant students over the past few years, our ELL teachers are shouldering a greater burden, and their current capacity is insufficient to meet the growing need.

Our city's transfer schools are under strain. Between 2019 and 2023, transfer school enrollment declined by 22%, which is much a greater rate than in traditional high schools. This decline has come about for several reasons, including pandemic-era shifts in grading policies and graduation requirements, increasing mental health issues, and economic

pressures. This decline has put financial strain on these schools due to the city's Fair Student Funding formula, which allocates funding on a largely per-pupil basis.

Additionally, programs in transfer schools such as Learning to Work are a strong way to help these students find their paths beyond graduation. By connecting students with paid internships, support services, job readiness training, and college and career exploration activities, these schools can create a bridge between education and future success. Building work experience and financial options are strong ways to ensure that these students remain committed to the school experience and stay on track for graduation.

As a city, we must work to ensure that the students in these transfer schools have the second chance at success that they deserve. We must do more to guarantee that the transfer schools are well-resourced and can provide the services and instruction that help our young people thrive. New funding allocations should be explored, and more money should be put into hiring and training ELL teachers and expanding services and programming.

Thank you for allowing me the opportunity to speak about the importance of supporting our transfer high schools and the thousands of students they serve. All of our students deserve the chance to complete their education and earn their diplomas. These schools are a critical part of our educational ecosystem and need our full support.

The New York City Charter School Center
Erik Joerss, Vice President of Advocacy and Government Affairs
Testimony Presented to the New York City Council Committees on Education
October 30, 2025

The New York City Charter School Center (Charter Center) respectfully submits the following testimony. The Charter Center thanks the New York City Council Committee on Education for providing the opportunity to comment on behalf of students attending New York City charter transfer high schools.

For over twenty-five years, public charter schools have been an integral part of the public education system in New York City (NYC). In the 2025-26 school year, there are 285 public charter schools operating in the five boroughs serving over 150,500 students. This represents 15% of public school students, of which nearly 90% are Black/African American or Latinx. New York's public charter schools are serving primarily low-income NYC families (nearly 83% are economically disadvantaged), offering high-quality educational options for families.

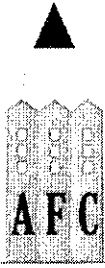
Learn to Work is a New York City Public Schools (NYCPS) funded program that provides grants to community-based organizations which allows them to partner with public transfer high schools serving overage/under-credited students. Currently, all New York City Public School (NYCPS) transfer high schools have or are eligible to have a CBO partnership under this program. This partnership provides students with critical benefits such as intervention and support, internships, workforce and college preparation, social and emotional counseling, alongside experiential learning and enhancement activities.

Over 2000 charter transfer high school students (distributed among 8 NYC public charter schools) have been denied access to these impactful Learn to Work programs. There is no rationale for this exclusion. High School students who attend charter transfer schools deserve career readiness skills alongside mentorship and potential job opportunities similarly to their peers who attend district public schools.

The Learn to Work program has been shown to significantly benefit students by bridging the gap between education and employment. It provides students with the skills, experience and connections needed to succeed in their chosen career path and should be expanded to include charter school students. Given the relatively small number of charter transfer high schools, the expansion of the Learn to Work program to charter schools is expected to cost under \$3 million. Charter school students remain the lowest funded public-school students in NYC, despite the myth that charter schools drain resources or cost the district a disproportionate amount of public aid. According to the most recent Independent Budget Office of New York City (IBO) analysis, NYC charter schools students receive between \$1,000-\$5,000 less than their district peers. A NYC student attending a public charter school receives much less public funding than their New York counterparts in district public schools. The exclusion from programs such as the Learn to Work program continues to exacerbate the inequities between district and charter students. In our city, every student should have equal access to resources that empower them to reach their fullest potential regardless of whether they attend a public district school or a public charter school.

Programs like Learn to Work play a vital role in leveling the playing field by equipping students with practical skills, real-world experiences, and valuable connections to an already challenging workforce. By ensuring that all students, irrespective of their public-school choice can participate in such initiatives, we not only promote equity but also can foster a community where every student in New York City has a chance to succeed and contribute meaningfully to society.

We ask that you work with City Hall to issue an RFP before the end of the year in order to allow charter transfer schools access to the Learn to Work program for next year.



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: Oversight – Transfer Schools
and
Int. 1359-2025 Requiring the Department of Education to Report on
Manifestation Determination Reviews**

October 30, 2025

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Thank you for the opportunity to testify. My name is Rohini Singh, and I am the Director of the School Justice Project at Advocates for Children of New York (AFC). For more than 50 years, Advocates for Children has worked to ensure a high-quality education for New York students who face barriers to academic success, focusing on students from low-income backgrounds. We speak out for students whose needs are often overlooked, including students with disabilities, students from immigrant families, students with mental health needs, and students who are homeless or in foster care. Every year, we help thousands of families navigate the education system.

I am here to testify today to highlight some key recommendations related to transfer schools and in support of Int. 1359, requiring the Department of Education to report on Manifestation Determination Reviews.

Transfer Schools

Transfer schools provide critical alternatives for students who have struggled in traditional high school settings, including overage and under-credited youth, immigrant students, and students with disabilities. Yet significant challenges remain in ensuring equitable access and adequate resources. To this end, we make the following recommendations:

Expand access to transfer schools for older immigrant students: Many older immigrant youth are turned away from transfer schools without clear alternatives, even when seats are available. English Language Learners who arrive as teenagers and young adults must learn a new language, should complete graduation requirements before they turn 22, and often have to make up for interrupted education—all while balancing work, family responsibilities, and migration-related trauma. Few transfer high schools offer the intensive academic and emotional support they need, and those that do are concentrated in Manhattan. The City should



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Protecting every child's right to learn

expand the number of schools designed specifically to meet these students' needs and should improve the placement process to ensure that a student who is not accepted to a particular transfer school is supported in finding an alternative placement.

Increase educational pathways such as transfer schools for overage and under-credited youth, including court-involved youth: In addition to expanding transfer school options equipped to serve older immigrant youth, the City should assess the need for additional transfer schools and other alternative programs that combine academics with work-based learning—approaches that have proven particularly effective for court-involved students.

Strengthen supports for students with disabilities in transfer schools: While transfer schools' flexible and individualized settings help many students with disabilities succeed, we find that access to appropriate services remains inconsistent, especially for under-credited students coming from District 75 settings, who are often blocked from transfer schools entirely. The DOE should ensure transfer school staff receive sufficient guidance, training, and resources to meet the needs of students with disabilities.

Improve access to information about alternative programs: The City should make information about transfer schools and other alternative education options easily available at Family Welcome Centers, including which transfer schools may have available seats. They should also bring back the transfer schools directory, in electronic and hard copy form, so that students can easily compare transfer schools, review any admissions requirements, and see schools' specialized programming. In addition, Family Welcome Center staff, guidance counselors, and Individualized Education Program (IEP) teams should receive training on enrollment procedures and program offerings.

Baseline funding for the Learning to Work program: The Learning to Work program provides essential academic and career-readiness support for students in transfer schools, but its funding (\$31M) is set to expire in June 2026. We thank the City Council for your ongoing support of this program and urge the City to baseline funding to maintain these opportunities for students.

Together, these steps would strengthen the transfer school system and help ensure that all students—especially those who have struggled in traditional schools—have access to supportive, high-quality pathways to graduation.

Int. 1359-2025

AFC supports Intro. 1359, which would require the Department of Education to publicly report on Manifestation Determination Reviews (MDRs). Students with IEPs are suspended at disproportionately high rates compared to their peers without disabilities—often for behavior directly related to their disabilities. The MDR process is designed to protect these students by ensuring that disciplinary actions appropriately consider the impact of their disabilities. However, the process is often misunderstood and inconsistently applied by schools, leading to continued and unjust suspensions. Regular data collection and public reporting will bring much-needed transparency to this process and help guide reforms to better protect students with disabilities.



We have several recommendations for amending Intro. 1359 to help make the data as useful as possible. Our suggestions include the following:

- Incorporate the language of the bill into the special education reporting law (Section 21-955 of the Administrative Code), to align data collection and ensure the data can be viewed in conjunction with other City data on students with disabilities.
- Require reporting by community school district, not just by school, to identify district-level trends and ensure that disaggregated data get reported, as certain disaggregated school-level data would likely be redacted due to small numbers.
- Disaggregate data by key factors, including free or reduced-price lunch eligibility, race/ethnicity, gender, English Language Learner status, temporary housing or foster care status, disability classification, language of instruction, grade level, service recommendation, and district.
- Add key data points to assess equity in the MDR process, including:
 - The number and outcomes of MDRs where a parent representative (e.g., attorney or social worker) was present.
 - The number and outcomes of MDRs by underlying infraction code.

We are including our suggested revisions at the end of the testimony. Thank you, Chair Joseph, for introducing this bill. We look forward to working with you to get it enacted.

Thank you for the opportunity to testify. I am happy to answer any questions you may have.

Below please find our recommendations for amendments to Intro. 1359, incorporating the proposed Manifestation Determination Review (MDR) data reporting requirements into the current special education data reporting law (Section 21-955 of the Administrative Code), as per our suggestion. Following this version of the bill, we provide a second version, which includes amendments to the bill as a standalone data reporting law, separate from the broader special education data reporting law, in the event the bill sponsor prefers to have the proposed MDR requirements be a separate standalone section of law.

Int. No. 1359

By Council Members Joseph, Louis, Marte, Zhuang, Feliz, Banks, Avilés, Ayala and Gutiérrez

A Local Law to amend the administrative code of the city of New York, in relation to requiring the department of education to report on manifestation determination reviews

Be it enacted by the Council as follows:

Section 1. Subdivision a of section 21-955 of the administrative code of the city of New York, as amended by local law number 147 for the year 2023, is amended by adding new definitions of “Manifestation determination review” and “Procedural safeguards notice” in alphabetical order to read as follows:

Manifestation determination review. The term “manifestation determination review” means a review to determine whether a student’s behavior that is subject to disciplinary action is a manifestation of the student’s disability, as required pursuant to subparagraph (E) of paragraph (1) of subsection (a) of section 1415 of the United States code and section 201.4 of title 8 of the New York codes, rules and regulations, regarding manifestation determinations, or a successor provision.

Procedural safeguards notice. The term “procedural safeguards notice” means the notice required by subsection (d) of section 1415 of title 20 of the United States code and subsection (f) of section 200.5 of title 8 of the New York codes, rules and regulations, regarding due process procedures, or a successor provision.

§ 2. Subdivision b of section 21-955 of the administrative code of the city of New York, as added by local law number 27 for the year 2015 is amended to add new paragraphs 18, 19, and 20 to read as follows:

18. The number of students, both in total and disaggregated by eligibility for the free and reduced price lunch program, race/ethnicity, gender, English Language Learner status, status as a student in temporary housing, status as a student in foster care, disability classification, recommended language of instruction, grade level, service recommendation, community school district and school who were referred to a committee on special education for a manifestation determination review pursuant to chancellor's regulation A-443 or applicable state or federal regulations, regarding student discipline procedures, or a successor provision, and the number and percentage of such students who received more than one manifestation determination review during the same academic year;

19. The number of manifestation determination reviews conducted by a committee on special education, in total and disaggregated by:

(a) school;

(b) community school district;

(c) the infraction code associated with the disciplinary incident immediately preceding the referral for a manifestation determination review;

(d) whether the parent or guardian attended such review or was absent;

(e) whether a parent representative (e.g. attorney, social worker) was present at such review;

(f) whether notice of such review was provided to the parent or guardian at least 5 days in advance of such review, provided fewer than 5 days in advance, or not provided; and

(g) whether the procedural safeguard notice was provided on the same day as the date of referral to a committee on special education, or was not provided the same day; and

20. The following information for such manifestation determination reviews, disaggregated by eligibility for the free and reduced price lunch program, race/ethnicity, gender, English Language Learner status, status as a student in temporary housing, status as a student in foster care, disability classification, recommended language of instruction, grade level, service recommendation and community school district:

(a) The number and percentage of such manifestation determination reviews conducted within 10 school days of the date of referral to a committee on special education, and the number and percentage conducted more than 10 school days after the date of referral;

(b) The number and percentage of such manifestation determination reviews resulting in a finding that the student's behavior was a manifestation of the student's disability, both in total and further disaggregated by whether the parent or guardian attended and whether a parent representative was present; and

(c) The number and percentage of such manifestation determination reviews resulting in a finding that the student's behavior was not a manifestation of the student's disability, both in total and further disaggregated by whether the parent or guardian attended and whether a parent representative was present.

By Council Members Joseph, Louis, Marte, Zhuang, Feliz, Banks, Avilés, Ayala and Gutiérrez

A Local Law to amend the administrative code of the city of New York, in relation to requiring the department of education to report on manifestation determination reviews

Be it enacted by the Council as follows:

Section 1. Title 21-A of the administrative code of the city of New York is amended by adding a new chapter 40 to read as follows:

CHAPTER 40

REPORTING ON MANIFESTATION DETERMINATION REVIEWS

§ 21-1012 Reporting on manifestation determination reviews. a. Definitions. For purposes of this section, the following terms have the following meanings:

Committee on special education. The term “committee on special education” has the same meaning as set forth in section 201.2 of title 8 of the New York codes, rules and regulations, regarding procedural safeguards for students with disabilities subject to discipline, or a successor provision.

Manifestation determination review. The term “manifestation determination review” means a review to determine whether a student’s behavior that is subject to disciplinary action is a manifestation of the student’s disability, as required pursuant to subparagraph (E) of paragraph (1) of subsection (a) of section 1415 of the United States code and section 201.4 of title 8 of the New York codes, rules and regulations, regarding manifestation determinations, or a successor provision.

Procedural safeguards notice. The term “procedural safeguards notice” means the notice required by subsection (d) of section 1415 of title 20 of the United States code and subsection (f)

1 of section 200.5 of title 8 of the New York codes, rules and regulations, regarding due process
2 procedures, or a successor provision.

3 Referral to a committee on special education. The term “referral to a committee on
4 special education” means the act of notifying a committee on special education that a student
5 requires a manifestation determination review, pursuant to chancellor’s regulation A-443 or
6 applicable state or federal law, regarding student discipline procedures, or a successor provision.

7 b. No later than 120 days after the effective date of the local law that added this section,
8 and by November 1 annually thereafter, the chancellor shall submit to the speaker of the council
9 and post conspicuously on the department’s website a report regarding manifestation
10 determination reviews conducted during the preceding academic year. Such report shall include
11 the following information for each community school district~~school~~, and shall also include such
12 information aggregated by ~~community school district, borough,~~ and citywide:

13 1. The number of students referred to a committee on special education for a
14 manifestation determination review, in total and disaggregated by:

15 (a) School;

16 (b) Grade level;

17 (c) Race or ethnicity;

18 (~~b~~d) Gender;

19 (ee) English language learner status;

20 (~~e~~f) Eligibility for the free and reduced price lunch program;

21 (eg) Status as a student in temporary housing; ~~and~~

22 (~~f~~h) Status as a student in foster care; and

23 (i) Disability classification;

1 2. The number of manifestation determination reviews conducted by a committee on
2 special education, in total and disaggregated by:

3 (a) The number and percentage of such manifestation determination reviews in which the
4 parent or guardian reported not receiving notice of the manifestation determination review or for
5 which no documentation of such notice exists;

6 (b) The number and percentage of such manifestation determination reviews for which
7 notice of the manifestation determination review was provided to the parent or guardian at least 5
8 days in advance of such review, and the number and percentage in which such notice was
9 provided fewer than 5 days in advance of such review;

10 (c) The number and percentage of such manifestation determination reviews in which the
11 parent or guardian did not attend the manifestation determination review;

12 (d) The number and percentage of such manifestation determination reviews in which
13 translation-interpretation services were requested by a parent or guardian and the number and
14 percentage of instances in which such services were provided during the manifestation
15 determination review;

16 (e) The number and percentage of such manifestation determination reviews for which
17 the procedural safeguard notice was not provided on the same day as the date of referral to a
18 committee on special education, and the number and percentage for which such notice was not
19 provided on the same day;

20 (f) The number and percentage of such manifestation determination reviews conducted
21 more than within 10 school days after of the date of referral to a committee on special education,
22 and the number and percentage conducted more than 10 school days after the date of referral;

1 (g) The number and percentage of such manifestation determination reviews resulting in
2 a finding that the student's behavior was a manifestation of the student's disability, both in total
3 and disaggregated by:

4 (i) Race or ethnicity;

5 (ii) Gender;

6 (iii) English Language Learner status;

7 (iv) Eligibility for the free and reduced price lunch program

8 (v) Status as a student in temporary housing;

9 (vi) Status as a student in foster care; and

10 (vii) Disability classification; and

11 (h) The number and percentage of such manifestation determination reviews resulting in
12 a finding that the student's behavior was not a manifestation of the student's disability, both in
13 total and disaggregated by:

14 (i) Race or ethnicity;

15 (ii) Gender;

16 (iii) English Language Learner status;

17 (iv) Eligibility for the free and reduced price lunch program

18 (v) Status as a student in temporary housing;

19 (vi) Status as a student in foster care; and

20 (vii) Disability classification; and

21 3. The number of students who received more than one manifestation determination
22 review during the same academic year.

1 c. The report shall also include a summary of system-wide practices used by the
2 department to inform parents and guardians about the manifestation determination review
3 process.

4 d. No information that is otherwise required to be reported pursuant to this section shall
5 be reported in a manner that would violate any applicable provision of federal, state, or local law
6 relating to the privacy of student information, or that would interfere with law enforcement
7 investigations or otherwise conflict with the interests of law enforcement. If a category to be
8 reported contains between 1 and 5 students, or allows another category to be narrowed to
9 between 1 and 5 students, the number shall be replaced with a symbol. If a category contains
10 zero students, it shall be reported as zero, unless such reporting would violate any applicable
11 provision of federal, state, or local law relating to the privacy of student information.

12 § 2. This local law takes effect immediately.

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TESTIMONY OF:

Anna Arkin-Gallagher – Associate Director, Civil Justice Practice

BROOKLYN DEFENDER SERVICES

Presented Before

The New York City Council Committee on Education

Oversight Hearing on Transfer Schools

October 30, 2025

My name is Anna Arkin-Gallagher, and I am the Associate Director of the Civil Justice Practice at Brooklyn Defender Services (BDS). BDS is a public defense office whose mission is to provide outstanding representation and advocacy free of cost to people facing loss of freedom, family separation and other serious legal harms by the government. For nearly 30 years, BDS has worked, in and out of court, to protect and uphold the rights of individuals and to change laws and systems that perpetuate injustice and inequality. After 29 years of serving Brooklyn, we expanded our criminal defense services in Queens. We are proud to bring the same dedication and excellence to Queens. We thank the Committee on Education and Chair Joseph for the opportunity to address the Council about transfer schools and data reporting on manifestation determination reviews (MDRs) conducted for students with disabilities in New York City.

BDS's Education Unit delivers legal representation and informal advocacy to our school-age clients and to parents of children in New York City schools. Many of the people we serve are involved in the criminal legal system or in family court proceedings. A significant number of the students we work with qualify as "over-age and under-credited" and have been retained at least one grade, and more than half of the students we work with are classified as students with disabilities. We also represent parents in Article 10 proceedings in family court and advocate for their children to access educational resources while placed in the foster system. As an interdisciplinary legal and social work team, we work to improve access to education for the people we represent and their families. Much of our advocacy is to ensure youth have access to the special education services they are entitled to as well as to defend youth in school discipline proceedings to ensure they have access to an education. We also have expertise in educational matters related to those who are in detention and jails, and work to ensure our clients who are incarcerated or leaving incarceration are able to access the education to which they are entitled or find alternative pathways to graduation.

DEFEND • ADVOCATE • CHANGE



Transfer Schools

Our team works with many young people who have become disconnected from school and fallen behind. For these students, transfer schools offer them a chance to reconnect with their education. Many of the young people our office has served have appreciated the small size, flexible programming, and internship opportunities available at transfer schools. It has been meaningful for these students to come closer to graduating on time – or even catch up to their graduation cohort.

Despite the positive experiences that many of our clients have had with transfer schools, our office finds that it is often challenging to help our clients enroll in transfer schools because of the decentralized nature of the application process. In order to apply to transfer schools, prospective students need to contact each school that they are interested in applying to one-by-one. While the NYC Public School (NYCPS) online [Transfer Schools Guide](#) contains some basic information about each transfer school and the types of students it serves, it is out of date. In fact, it still implies that all students are participating in remote learning, which has not been the case since the first years of the COVID-19 pandemic – and simply directs students to individually contact schools that they are interested in.

When our office is working to help students enroll in transfer schools, we find that it is often difficult to figure out which transfer schools are enrolling, what the enrollment process is, what the criteria are for admissions, or what the timeline is for admissions. Transfer school websites often do not contain up-to-date information on enrollment, it can be difficult to reach someone by phone who is familiar with the admissions process, and emails often go unanswered. An attorney from BDS recently visited a Family Welcome Center with a young person interested in enrolling in a transfer school. The enrollment counselor printed some information for the student on two nearby transfer schools. However, when the attorney followed up, neither school was accepting new students.

Young people interested in exploring transfer school options are, by definition, behind in school. Many of them have become disconnected from their education; some of them haven't attended school for some time. But often, when we first meet them, these young people are excited about the prospect of reengaging with school and working at an accelerated pace towards their high school graduation. Time and time again, however, the lengthy process of enrolling in a transfer school means we cannot seize upon this moment when students are excited to re-enroll. Our office has worked with many students who become so frustrated by the transfer school enrollment process that they drop out of school for good.

When students are rejected from transfer schools, there is often little transparency about why they have been rejected, and no support is provided in finding another option that might work for them. Our office worked with a young person last year who – at almost 19 – was rejected by several transfer schools. Our best guess was that schools were reluctant to accept a student who

was so close to aging out of school eligibility, but the transfer schools never stated this explicitly and so we could only speculate about why he was being rejected. What is more, when rejected, this young person was given no information from NYCPS about what educational options might have been more appropriate for him.

It is particularly difficult to find transfer school options that serve students with disabilities. We have seen situations where students with relatively common special education placements, like an Integrated Co-Teaching classroom, have been told that there is no room for them at transfer schools, and students with IEPs at transfer schools do not always receive their mandated services. But the lack of accelerated options is especially acute for students with specialized school placements. Our office has worked with many young people who have the academic capacity to do accelerated work. However, because their IEP indicates that they require a District 75 placement – often for behavioral disabilities – transfer schools are unavailable to them.

Another issue we find when working with young people is that many of the transfer schools in Brooklyn are clustered in a relatively small geographic area. When we are working with young people who live far from the neighborhoods with transfer school options – or who have safety concerns about being in these neighborhoods – there are few other options to explore with them. For clients in Queens, where there are only a few transfer school options in the entire borough, there are often no transfer schools located within reasonable commuting distance of a young person's home.

Finally, the accelerated options for middle school students are very limited. ReStart Academy has been a wonderful option for some of the young people we work with, who have been able to work at a faster pace to get into high school, and who appreciate being with their same-aged peers, as well as the support that ReStart offers. However, ReStart Academy is the *only* option for students in middle school, and younger middle school students (in sixth grade, and some seventh graders) have no options for catching up with their cohort. ReStart has also rejected some students our office has worked with and has dismissed some students from the program just days after they began if they exhibit behavioral challenges or have attendance issues. Once kicked out of ReStart, these young people have no other option but to return to a traditional middle school, where they may be years older than their peers.

In light of these difficulties, we urge the city to work towards improving access to transfer schools by making the following investments and policy changes:

Simplify the enrollment process for transfer schools. NYCPS must make it easier for over-age and under-credited students to enroll in transfer schools. Prospective students and families should be able to easily learn which transfer schools are currently accepting students, what the enrollment process is, and what the criteria for admission are. The Transfer School Guide on the NYCPS website should be regularly updated with this information and enrollment counselors at



Family Welcome Centers should be able to connect students with transfer school options that are appropriate for the student, and that have open seats.

Provide more support regarding alternative options for students who are not accepted to transfer schools. When a student is rejected from a transfer school, they should be immediately connected with an enrollment counselor for assistance finding another transfer school or program that may be appropriate for them.

Ensure that transfer schools are geographically distributed so that students have a choice of schools in a variety of neighborhoods. Students interested in attending transfer high schools should be able to find schools convenient to their homes, or in other neighborhoods where they feel safe attending school.

Expand the services at transfer schools available to students with disabilities. NYCPS should expand special education supports available to students at transfer high schools to allow more students with disabilities the opportunity to attend these schools, including creating options – such as District 75 inclusion programs – that will allow District 75 students to enroll in these schools when appropriate.

Increase accelerated options for younger students. Accelerated options like ReStart Academy should be extended to all middle school students and should be more widely available. Students should be given the opportunity to remain in this accelerated program, even if they are exhibiting behavioral challenges or have attendance issues.

Int. 1359

BDS supports Int. 1359, which will improve transparency regarding Manifestation Determination Reviews (MDRs) in New York City.

Over the past decade that our education team has attended MDRs, we have seen a wide range in how these meetings are conducted. MDRs we have attended have ranged from meetings where the intricacies of a student's disability and its relationship to the behavior leading to a suspension are thoughtfully considered to quick meetings where discussion is minimal, and a decision about whether a student's behavior is related to their disability appears to have been made before the family enters the MDR meeting.

We are hopeful that the reporting of data regarding MDRs will have the effect of improving how MDR meetings are conducted and also help the city to target areas where more support might be needed.

We thank you for the opportunity to submit testimony on this critically important topic. If you have any questions, please feel free to contact me at aarkingallagher@bds.org or (646) 971-2719.



Good morning, Chair Joseph, and members of the Committee on Education,

My name is Valerie Barton-Richardson, and I am President and CEO of CAMBA, Inc. we have partnered with the New York City Department of Education for nearly two decades to support young people who have fallen behind in their education or become disengaged from school.

Through our Learning to Work (LTW) programs embedded in Transfer High Schools and Young Adult Borough Centers, CAMBA, Inc. has helped more than 5,200 over-age and under-credited students rediscover their paths to success—re-engaging with education, earning their diplomas, and building the skills necessary for college, career, and life.

We are deeply grateful for the opportunity to testify today and to share CAMBA's perspective on the vital role that transfer schools and the Learning to Work program play in creating equitable pathways for New York City's most resilient students.

Transfer high schools are a cornerstone of educational equity in New York City.

They serve students who have faced tremendous barriers to success—students who may have left school due to family responsibilities, economic hardship, housing instability, mental health challenges, or simply because traditional schools did not meet their needs.

Transfer schools re-engage these young people through:

- Small class sizes,
- Individualized instruction,
- Accelerated credit recovery,
- Holistic wraparound supports.

The students who attend these schools are overwhelmingly Black, Latinx, multilingual learners, students with disabilities, and, increasingly, newly arrived immigrant youth. For many of them, transfer schools are not just another chance at a diploma—they are a *lifeline*.

At CAMBA, Inc. we witness daily how these schools become communities of care and possibility. Students arrive believing that school is not for them; they leave believing in their own futures. Through LTW, CAMBA staff work side-by-side with school teams to build trust, remove barriers, and show students that success is within reach.

We also coordinate community partnerships that extend beyond academics. At Forsyth Satellite Academy, for example, CAMBA's LTW program partners with Trader Joe's to deliver fresh produce, baked goods, and ready-to-eat meals every two weeks—not just for LTW students, but for all 577 students in the building.

Despite these successes, the sustainability of transfer schools—and the LTW programs that support them—is at risk.

Transfer schools have experienced a 22% enrollment decline since 2019, far greater than the 5% drop across traditional high schools. Because school budgets are tied to Fair Student Funding, which is based largely on per-pupil formulas, declining enrollment has meant drastic budget cuts—even as student needs have become more complex.

Transfer schools require higher staffing ratios, mental health support, and individualized programming, which fixed per-student funding cannot adequately support. When funding decreases, so do the very supports that make these schools effective—creating a harmful cycle that jeopardizes their mission.

We urge the Council and DOE to explore stabilization funding or a baseline allocation model that protects transfer schools from enrollment volatility and recognizes the intensive nature of the services required. Transfer schools are held to the same four-year graduation rate metrics as traditional schools, even though their students often re-enter the system years behind. This system obscures the tremendous progress these schools make in helping students recover credits, re-engage, and graduate—sometimes within five or six years. We echo the recommendations of Eskolta School Research and Design and the CUNY Public Science Project: accountability frameworks should measure student growth, credit accumulation, persistence, and socio-emotional development, not just time to completion. Success for transfer schools should be measured by *how far students have come*, not simply how fast they got there. Transfer schools have seen a surge in newly arrived immigrant students, who often face interrupted education, trauma, and housing instability. While DOE has opened new programs for ELLs, schools lack sufficient certified bilingual and ENL teachers to meet demand. Fewer than 3,000 bilingual-certified teachers citywide—roughly one for every 47 ELL students—leaves transfer schools unable to fully deliver bilingual instruction, even as research shows it is the most effective model for language acquisition. Advocates estimate that at least \$3 million in baseline funding is needed to sustain comprehensive bilingual and social-emotional supports at the six newest transfer school sites. CAMBA strongly supports this recommendation.

Recommendations

CAMBA respectfully urges the City Council, DOE, and State Education Department to:

1. **Reform Accountability Metrics** to reflect student growth and persistence rather than four-year graduation rates.
2. **Expand and Sustain Bilingual and ENL Staffing**, ensuring equitable language supports for newly arrived immigrant students.
3. **Invest in Mental Health and Basic Needs Services**, recognizing the compounding impact of housing instability, food insecurity, and trauma.
4. **Protect the LTW Partnership Model**, which uniquely blends DOE instruction with community-based expertise in youth development, social services, and workforce readiness, by providing stable funding that covers the full costs of these services.

Chair Joseph and members of the Committee—transfer schools and LTW programs embody the best of what public education can be: flexible, compassionate, and responsive to the realities our young people face. When we invest in these programs, we do more than help students earn diplomas—we restore hope, dignity, and opportunity.

On behalf of CAMBA and the thousands of students and families we serve, thank you for your continued partnership and for your commitment to ensuring that *every* young person in New York City has a path to success—no matter how winding that path may be.

Thank you.



**The New York City Council
Committee on Education
Honorable Rita Joseph, Chair
City Council Joint Hearing: Oversight - Transfer Schools
October 30, 2025**

Testimony of the Dignity in Schools Campaign - NY

Good afternoon, and thank you, Chair Joseph and members of the New York City Council Committee on Education. I am the director of the Dignity in Schools Campaign of NY (DSC-NY), a coalition of over 20 New York City organizations consisting of students, parents, educators, and advocates who work to create a system of school discipline and safety that is based on mutual respect and problem-solving, and to end the school-to-prison pipeline.

DSC-NY and our members are opposed to [Intro 1360-2025](#) and all efforts to insert policing and policing infrastructure into New York City Public Schools, including through enrichment, career pathways, and extra-curricular youth programming. We demand that NYC stop expanding NYPD youth engagement and programming in public schools and DYCD.

Young people should be able to play school sports, access tutors, and explore new hobbies without being exposed to or threatened by the criminal legal system. Yet at every opportunity, our city leaders are actively trying to create more outreach for youth programs provided by the police department. Unfortunately, the NYPD keeps finding new ways to enter our schools and take over enrichment programs so that they can monitor young people in every facet of their lives—inside and outside of school.

The NYPD school policing division has been advertising Police Foundation workshops and their ever-expanding “Options” Program – where cops are in charge of teaching children about issues like nutrition and emotional intelligence. The school policing division was able to open its own “Wellness Center” at a high school in Queens, while teachers, parents, and students are here fighting for schools to be able to lead those kinds of projects.

Cops are being emboldened by this administration to take more and more control over youth services, while there are city agencies better equipped to support young people—those are the very agencies consistently being threatened with budget cuts.

The NYPD Youth Response Unit is now taking young people on extracurricular trips to the aquarium, theme parks, and roller rinks. This police overreach broadens NYPD contact with young people’s social networks for their own nefarious means while doing nothing to solve the problem of unequal access to opportunity for the young people of New York.

The NYPD has been growing the scale of school policing without political resistance or inquiry, like through opening a new 60-cop “school safety command center” and creating a new “youth response unit” and “assistant school safety agent positions”, bringing more

police into schools, and increasing surveillance intel-sharing between precincts and school buildings. The Mayor and City Council are making it so that there is nowhere a young person can be without police to watch them, and funneling students into policing jobs that criminalize their communities.

Moreover, under Mayor Adams' leadership, City agencies, like the NYPD, continue to violate laws limiting information-sharing with federal immigration officers. NYPD school cops can currently place youth on a Criminal Group Database (CGD), also known as the gang database, with little to no evidence of any wrongdoing. The database currently contains approximately 16,000 names, with 99 percent of individuals identified as Black or Hispanic and 98 percent as male. It includes minors as young as 13 years old, and is contributing to the school to deportation pipeline.

We want the city to robustly fund enriching programs and after-school activities that engage young people and that don't involve police. Young people should not be forced to have to choose between joining an NYPD-run sports team or not playing sports at all – New York City should be flush with opportunities for young people to go outside, play, have joyful everyday experiences and grow up free from the threat of police.

We are calling on the NYC Council to:

- Take the lead and end these NYPD programs, and refuse to be complicit in what is ultimately a NYPD public relations strategy while they carry out violent and discriminatory policing strategies across the city.
- Expand school-based restorative justice and social-emotional supports, including investing \$80 million in hiring school-based Restorative Justice Coordinators in 500 schools. We can fund this expansion simply by not hiring any new School Safety Agents due to attrition or new classes.
- Redirect money away from school policing, including ceasing all NYPD recruitment, hiring, and training of school police, and stopping funding for surveillance technology. Simply by not hiring any more school police, NYC could save up to \$90M in one fiscal year to fund restorative justice, enrichment, and afterschool programs.
- End the GANGS Database, as it perpetuates the wrongful criminalization and potential deportation of immigrant students.

Thank you for the opportunity to testify.

Submitted by:
Andrea Ortiz
Membership and Campaign Director
Dignity in Schools Campaign - NY



October 30, 2025 Education Committee Hearing on Transfer High Schools**Submitted by: Lara Evangelista, Executive Director Internationals Network for Public Schools**

Good afternoon, Chair Joseph and members of the Council.

My name is Lara Evangelista, and I am the Executive Director of Internationals Network for Public Schools. Since 2004, Internationals Network has partnered with NYCPS to ensure that multilingual learners, students who bring incredible linguistic and cultural assets to our schools, can access high-quality education and graduate prepared for college, career, and civic life.

Internationals Network proudly supports one of our own Transfer Schools, ELLIS Prep in the Bronx. This is the school where Dylan Contreras attends, one of the first known NYCPS students detained at his immigration hearing in May and remains detained today. Over the past three years, through our Project SOARING initiative, we have also partnered closely with six Transfer High Schools that were serving growing populations of multilingual learners, providing intensive PD, coaching and strategic planning support, including the schools Supt Sullivan mentioned. Through the support of NYCPS, we also collaborated with the Transfer School District to provide professional development more broadly to their schools in meeting the needs of their MLLs.

Transfer Schools play a uniquely important role in our city's education ecosystem, serving students who are over-age and under-credited, many of whom have faced interrupted education, housing insecurity, or the challenges of recent migration. These schools provide individualized pathways, deep relationships, and wraparound supports that help young people re-engage and thrive. I saw this first hand when I was the deputy superintendent of the CIOB district where in addition to ELLIS prep, I supervised 7 other transfer schools.

However, Transfer Schools, and others that serve our highest-need students and take them year round, like our 15 other International high schools, are currently facing budget pressures due to enrollment shifts linked not just to the general enrollment decline in the city but to the broader political and migration landscape.

We urge the council and NYCPS to find ways to continue to support Transfer Schools and other schools serving the highest need students at this time. These schools cannot continue to meet their students' complex academic and social-emotional needs if they are penalized for factors beyond their control. At a moment when so many young people are depending on them, we must invest in these schools that give students a second chance and a pathway to success.

Thank you, Chair Joseph, for your ongoing commitment to equity and opportunity for all New York City students.



**Testimony Provided by Nelson Mar
Before the New York City Council, Committee on Education
Regarding Intro. 1359, Reporting Bill on Manifestation Determination Reviews
October 30, 2025**

Legal Services NYC (LSNYC) respectfully submits the following testimony regarding Intro. 1359, a Local Law to amend the administrative code of the city of New York, in relation to requiring the department of education to report on manifestation determination reviews.

Introduction:

I am Nelson Mar, a staff attorney in the Education Unit of Bronx 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. Education attorneys at LSNYC fight for students to access appropriate special education services, combat the school-to-prison pipeline, support healing-centered schools, enforce families' language access rights, and so much more. Thank you Chair Joseph and members of the Education Committee of the City Council for the opportunity to discuss Intro. 1359 and the importance of the manifestation determination review (MDR) process in NYC public schools.

Manifestation Determination Reviews

Recognizing that students with disabilities have long been subject to discipline that may be related to their behaviors, Congress in 1997 amended the Individuals with Disabilities

Demand Justice.

Education Act (IDEA) to provide students with disabilities added due process protections. Under the IDEA, all public school districts cannot discipline a student for more than ten school days (cumulatively or consecutively in one school year) if the behavior that lead to the conduct is substantially related to the student's disability or disabilities.¹ The IDEA requires school districts to conduct a meeting called a manifestation determination review (MDR) where staff from the district along with the student's parent would review the student's disabilities to determine if the student's conduct was either (a) a manifestation of the student's disability/disabilities; or (b) a direct result of the school district's failure to implement the students individualized education program (IEP).²

If the answer is "yes" to either of above, the student is to be reinstated to their class and the district is also required to look at how they can support the student from reengaging in those behaviors by conducting a functional behavior assessment (FBA). With the results of this assessment, the district is then required to either develop a new behavior intervention plan or revise a behavior plan if one already exists.³ If the answer is "no" to either of the above, the student is required to serve the full period of suspension.⁴

As you can see, MDR process can be an important tool to disrupt the cycle of disruption, discipline and exclusion. If school staff can identify the underlying reasons for a student's behavior, they can develop a plan to prevent the behavior from happening again or mitigate it from becoming a significant disruption.

¹ 20 U.S.C. 1415 (k)(1) and (7); 34 CFR 300.530

² Id.

³ Id.

⁴ Id.

Discipline and Students with Disabilities in NYC

The data in NYC public schools tell a story of missed opportunities. NYC public schools issued over 14,000 disciplinary removals of students with disabilities during the 2023-2024 school year – nearly 40% of total suspensions, despite these students comprising only 22% of the student population. Each suspension represents more than lost classroom time; it often means the denial of crucial special education services and a step towards school disengagement.

The data also tells us that the NYC Department of Education has not been properly conducting MDRs. Through the successful litigation brought by our colleagues at Advocates For Children, NYC DOE was required to report data on MDRs⁵ and the data from 2015-2018 found that only 45-55% of the time was there “effective discussion” of the student’s disability at an MDR meeting. This is often the experience so many advocates that are testifying to you this afternoon have encountered at these MDRs. Further, the data from these reports not surprisingly showed that positive manifestations that the behavior was related to a disability were found more frequently for white students than their Black and Latino peers.

Importance of Ongoing Data Reporting

A disciplinary removal represents a critical turning point in a student's education, especially for those with disabilities. With proper advocacy, this moment can become an opportunity to reinvest in our most at-risk students rather than a step toward disengagement and dropout. By reducing the likelihood of students engaging in recurring behaviors, the MDR process can also support improving classroom management and decreasing the likelihood that teachers will leave

⁵ See Advocates for Children, *E.B. v. Department of Education*, <https://advocatesforchildren.org/case/e-b-v-department-of-education/>

the profession. A recent survey from the University of Missouri of nearly 500 teachers found 78% of teachers have considered quitting and challenging student behaviors was one of the top reasons.⁶

LSNYC believes Intro 1359 will create greater data transparency, and by doing so it can help policy makers assess whether the NYC DOE is properly complying with the law to provide meaningful manifestation determination reviews and thus taking advantage of the opportunity to modify challenging behaviors. We need disaggregated data to ensure not only that staff are conducting the meetings properly but to see if certain demographic groups are being disproportionately impacted by this process. Greater data transparency is especially crucial at this moment when the United States Department of Education has dramatically stepped back from its traditional role in gathering and analyzing education data, including data related to students with disabilities.

Thank you for your consideration of our testimony. In closing, we are sharing below two stories of clients served by LSNYC over the last few years that highlight the challenges presented in the MDR process which hopefully greater data transparency under Intro 1359 will help address.

MDRs as a Force to Address Unmet Behavioral Needs

A parent of a middle school child received a suspension letter claiming her daughter showed inappropriate videos to her friends in school. Her daughter had an IEP for learning disabilities. Through LSNYC requesting records to prepare for the suspension hearing and the

⁶ Reinke, W.M., Herman, K.C., Stormont, M. *et al.* Teacher Stress, Coping, Burnout, and Plans to Leave the Field: A Post-Pandemic Survey. *School Mental Health* 17, 32–44 (2025).

MDR, the parent learned that the school had observed similar inappropriate behaviors in the child for months but had not informed the parent, did not provide counseling, and school officials did not take any action to assess the cause of such behaviors. At the start of the MDR meeting, school staff declared that because the student's special education classification was "Learning Disabilities" and there was no prior documentation of these inappropriate behaviors, it was not related to her disabilities. However, once LSNYC attorney advocated that the school had written reports of multiple instances of similar inappropriate behavior and took no action, the district representative agreed it was a manifestation of the disability because the school lacked updated evaluations of the student that should have occurred due to the change in behavior. The student then received a functional behavior assessment to create a behavior intervention plan to help reduce this inappropriate behavior.

Addressing Unidentified Need

A middle school student previously had an IEP for an academic disability but had been able to catch up academically so the parent asked that his child be decertified for special education services. The student was suspended for an incident where she allegedly bumped a teacher while chasing another student who had insulted her. LSNYC spoke with the parent about how an IEP can also address a student's emotional needs and enhancing emotional skills. The parent was not aware of that special education services can address behavioral and emotional needs of students and agreed that they wanted this support for his daughter. LSNYC assisted the parent at the suspension hearing and subsequently requested the student receive special education services. When the student returned to the school after the suspension, she was not offered any counseling nor a plan to address the bullying. Yet again, the school suspended the student after she again reacted to another student insulting and bullying her. LSNYC represented the student

at the suspension hearing and the MDR. The MDR team decided the behavior was a manifestation of the student's emotional disabilities and agreed to conduct a functional behavior assessment and then create a Behavior Intervention Plan to address the triggers of her behaviors and how staff can better assist the student to deescalate. With an appropriate IEP and a plan to address the bullying, the student is now thriving in school.

Testimony of the New York Civil Liberties Union¹
Before
New York City Council Committee on Education
On
Introduction 1359 and 1360
Regarding Police in New York City Schools and School Discipline
October 30th, 2025

The New York Civil Liberties Union (“NYCLU”) respectfully submits the following testimony on school discipline and police in NYC schools. We are appearing today in qualified support of Int.1359 and in opposition to Int.1360.

I. INTRODUCTION

The NYCLU, the New York State affiliate of the American Civil Liberties Union, is a nonprofit, nonpartisan organization with eight offices and more than 100,000 members and supporters across the state. The NYCLU’s mission is to defend and promote the fundamental principles, rights and values embodied in the Bill of Rights of the U.S. Constitution and the Constitution of the State of New York. Protecting and expanding students’ rights is a core component of our mission, and through our Youth and Students’ Rights program the NYCLU advocates for a positive school climate and equitable access to quality education for all students.

As a founding member of the Student Safety Coalition, the NYCLU partnered with students, parents, and advocates across the city to enact the Student Safety Act—a first-of-its-kind reporting law on student safety and discipline in schools. The Student Safety Act has given the public a rare view into the inner workings of schools and the NYPD, revealing a system of “school safety” that is both unsafe and harmful to many Black and Latinx students and students with disabilities. These students are subject to arrests, handcuffs and other restraints, and referrals to 911 at much higher rates than white students.²

In our work to reduce the role of police and exclusionary discipline in New York schools, we have relied heavily on data collected by school districts statewide to better understand and communicate the discriminatory impact of zero tolerance policies and practices. We are committed to using transparency tools to expand students’ rights and protect New York’s young people. Today, we offer our qualified support of Int. 1359, with some suggestions for strengthening the law’s potential as a key transparency tool.

¹ Contact: Jessica Balistreri, Data Analyst, jbali@nyclu.org

² NYCLU. “The Criminalization of NYC Students: 12 Years of Data on Police in Schools.” Available at <https://www.nyclu.org/data/criminalization-nyc-students-12-years-data-police-schools>.



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II. STUDENTS WITH DISABILITIES ARE DISPROPORTIONATELY SUSPENDED (*AT HIGHER RATES*?) COMPARED TO THEIR PEERS WITHOUT A DISABILITY

Exclusionary school discipline, such as out-of-school suspension, has a demonstrated discriminatory impact on students of color and students with disabilities.³ Students of color with disabilities are at the greatest risk of suspension, with Black students with disabilities over four times more likely to face suspension compared to their white peers without disabilities.⁴

The NYCLU conducted an analysis of 3 years' worth of data from the NYCPS Annual Report on Student Discipline.⁵ In our analysis, we found that New York City schools issued on average 3,287 Teacher Removals, 7,852 Principal Suspensions, and 2,566 Superintendent Suspensions to students with disabilities annually since the return to in-person learning.

During the 2023-2024 school year, 43% of all Superintendent suspensions issued citywide were issued to students with disabilities, despite these students making up only 22% of DOE enrollment that year.⁶ By comparison, students without disabilities made up 78% of enrollment that same year but only made up 57% of Superintendent suspensions. NYCLU's analysis found that during the 2023-2024 school year, students with disabilities were two and a half times more likely to be issued a Superintendent suspension compared to their peers without a disability.

³ Miller, Johanna, et al. *Education Interrupted*. NYCLU. January 2011. Available at https://assets.nyclu.org/publications/Suspension_Report_FINAL_noSpreads.pdf

⁴ *Id.*

⁵ New York City Public Schools. "Student Discipline-Annual Report on Student Discipline," 2021-2022, 2022-2023, 2023-2024. Available at <https://infohub.nyced.org/reports/government-reports/suspension-reports>

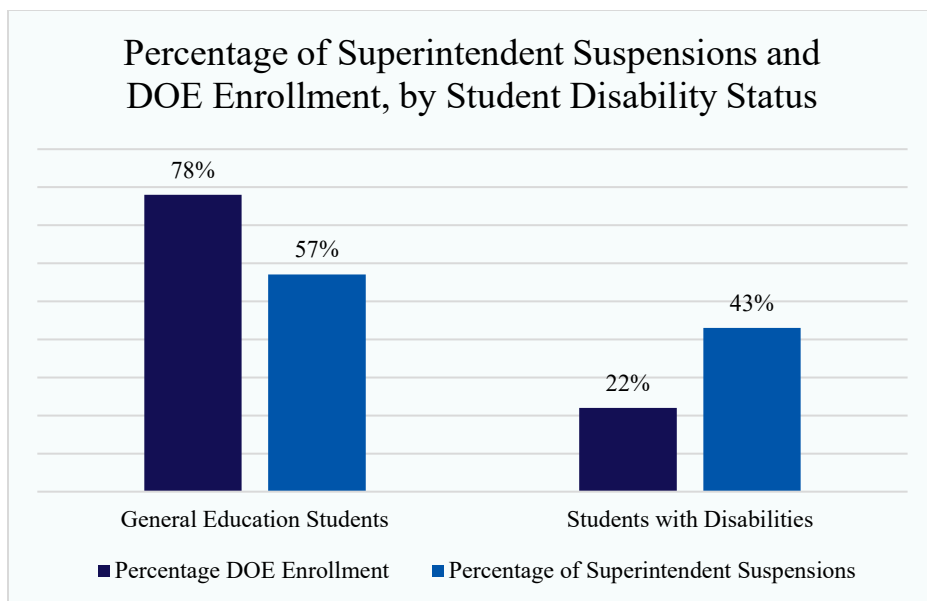
⁶ If students with disabilities were not suspended at higher rates, their suspension rate would be proportional to their enrollment (e.g. if they make up 23% of DOE enrollment, they will make up 23% of Superintendent Suspensions). This is what we refer to when we mention disproportionality.



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Even when these students do not receive a Superintendent suspension, they are frequently pushed out of school through frequent, shorter suspensions. Our analysis found that students with disabilities were almost three times more likely to get suspended or removed from the classroom more than once in the 2023-2024 year compared to their peers.

While the Student Safety Act requires schools to report the number of overall suspensions, data regarding the suspension process relative to a student’s disability is not available. As such, we are severely limited in terms of accessing the scope and intersectionality of how these suspensions and the suspension process impacts students with disabilities.

III. DUE PROCESS PROTECTIONS FOR STUDENTS WITH DISABILITIES ARE OFTEN LACKING

Under federal law, students with disabilities facing lengthy or multiple out-of-school disciplinary suspensions are entitled to additional due process protections in order to prevent schools from pushing them out of the classroom due to behaviors related to their disability.⁹

The MDR process is often inequitable. For example, under law, parents must receive written notice from their child’s school notifying them about their child’s suspension hearing and MDR. It is not uncommon for parents to receive improper notice for either the hearing or MDR, such as getting a phone call instead of receiving the

⁷ New York City Public Schools. “NYCPS Data at a Glance (2023-2024),” October 2025. Available at <https://www.schools.nyc.gov/about-us/reports/nycps-data-at-a-glance>

⁸ New York City Public Schools. “Student Discipline-Annual Report on Student Discipline,” 2021-2022, 2022-2023, 2023-2024. Available at <https://infohub.nyced.org/reports/government-reports/suspension-reports>

⁹ Individuals with Disabilities Education Act (IDEA), 20 USC §1415 (j) (2005).

written notice and consequently being unable to attend. Similarly, MDRs often occur beyond the 10-day timeframe, causing students to miss school improperly before receiving a determination of whether their behavior was a manifestation of their disability. In fact, some advocates and families believe this is done on purpose, a loophole exploited by schools to remove students from class without adequate cause.

MDRs also result in inequitable outcomes for students of color with disabilities. Studies show that MDRs are shown to be more protective of white students with disabilities, and Black students with disabilities are more likely to face exclusionary discipline.¹⁰

Schools are not currently required to report on whether procedural violations occurred throughout the MDR process, leaving a huge hole in our understanding of how these systems are working. Because students with disabilities are especially vulnerable, it is important for the public to have access to this data and promote solutions where things are not working.

IV. QUALIFIED SUPPORT FOR INT. 1359 AND SUGGESTIONS FOR IMPROVEMENT

We urge the City to adopt this legislation and commit to protecting the constitutional rights of students with disabilities through increasing data transparency and accessibility around school disciplinary practices.

We also recommend strengthening this bill by adding additional language and data collection to allow for the intersectional examination of student experiences (with redactions as necessary to protect student privacy pursuant to the Family Education Rights and Privacy Act, or FERPA).

Specifically, we recommend the following additions to the bill:

- A. Report the disaggregate count of data required under subsection g and h by student demographic population, as outlined in section 1, subsections a-f. The current bill requires sections g and h regarding the outcomes of MDRs to be reported in terms of overall count of review outcomes. We recommend adding the breakdown of this data by student demographic populations, at the district and city level, to give greater insight into possible disparities.
- B. Report the disaggregate count of MDR outcomes outlined under subsection g and h by disability classification and infraction code as listed under the New York City Discipline Code for the given reporting year.

¹⁰ Fisher, A. E., Fisher, B. W., & Railey, K. S. "Disciplinary disparities by race and disability: Using DisCrit theory to examine the manifestation determination review process in special education in the United States." *Race Ethnicity and Education*, 24(6), April 2020. Available at <https://doi.org/10.1080/13613324.2020.1753671>.

- C. Require reporting of data on whether a student's parent/guardian had a legal advocate present during the MDR, disaggregated by school and district.
- D. Require data collection and reporting of students without IEP but suspected or presumed to have a disability inclusive of IDEA students and students with a 504 plan. These students are also entitled to MDR hearings. This data is essential to examining inequities as it would allow for an assessment of students who may need additional accommodation but do not have a formal disability diagnosis.
- E. Require reporting on MDR data for students in detention in Passages Academy. The current bill requires disaggregation by school, but we would like to ensure students in detention are included to ensure the data is representative of diverse student bodies.



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V. Int. 1360

We urge the Council to not pass this bill, which is tantamount to endorsing the NYPD's youth programs. It has been well-documented that the NYPD has used its youth sports leagues to surveil Muslim, Arab, and Middle Eastern children and families.¹¹

We ask instead that the council direct resources, support, and attention to the agencies and nonprofits established for the purpose of *supporting* young people¹² -- agencies that do not entangle their programming with the threat of police surveillance, and the full weight of the criminal legal system.

The NYPD youth programs exist within a broader policing strategy that includes surveillance, social media monitoring, interfering with school discipline, referring children to mental hospitals, using metal restraints on children as young as kindergarten, harvesting student data, and entering children's personal information, friendships, and networks into NYPD databases. The NYPD has caused harm to New York City's communities of color and broken their trust in almost every conceivable way.

Further, the Council must not acquiesce to the Police Foundation. The Police Foundation's largest project is financing the NYPD's intelligence program and expanding the NYPD's controversial international surveillance dragnet.¹³ Its core project is to bypass government oversight and public transparency and run public relations campaigns for the police.

¹¹ See, eg. Dave Zirin, "Not a Game: How The NYPD Uses Sports for Surveillance," *The Nation*. September 2013. Available at <https://www.thenation.com/article/archive/not-game-how-nypd-uses-sports-surveillance/>.

¹² See, eg. Michael Elsen-Rooney, "Don't scale back sports access, advocates and students tell NYC," *Chalkbeat*. April 2024. Available at <https://www.chalkbeat.org/newyork/2024/04/17/students-and-advocates-oppose-limits-to-school-sports-access/>.

¹³ New York City Police Foundation, "FY24 Annual Report," June 2025. Available at <https://nyc-police-foundation.paperturn-view.com/?pid=ODg8893397&p=9&v=1.1>.

During the 2020 New York City budget negotiations, the Council added a budget requirement to report on how foundation funds are used by the NYPD.¹⁴ Despite the requirement, the NYPD has refused to disclose this information. To this day, Police Foundation spending is hidden from the Council and the public.

Instead of deferring to the NYPD to run sports leagues, tutoring sessions, or entrepreneurial programs like the craft of wig making,¹⁵ the Council should be working to robustly fund and support youth opportunities inside New York City Public Schools, the Public Schools Athletic League, and the Department of Youth and Community Development.

VI. CONCLUSION

We urge the council to adopt Int. 1359 with recommended amendments, and to reject Int. 1360.

¹⁴ New York City Council, “New York Police Department – Private Budget Funding Report (XLSX),” 2022. Available at <https://council.nyc.gov/budget/fy2021/>.

¹⁵ New York City Police Department, “NYPD Kids First,” December 2021. Available at https://www.nyc.gov/assets/nypd/downloads/pdf/public_information/nypd_kids_first_reader_spreads-2021-12-02.pdf.

TESTIMONY

Committee on Education

October 30, 2025

The Legal Aid Society welcomes the opportunity to testify and thanks Chair Joseph and the City Council for their leadership on crucial educational issues affecting New York City students.

Throughout our 150-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 in 60,000 cases that benefits more than 135,000 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.

1. Manifestation Determination Reviews

MDRs are a vital protection for students with disabilities, and the citywide data surrounding these meetings is sorely lacking. This lack of data contributes to an inability to determine whether MDRs are and continue to be conducted consistent with due process rights outlined in federal and state law. We greatly appreciate Chair Joseph's efforts to remedy this problem by introducing this reporting bill.

In collaboration with advocates throughout the city, the Legal Aid Society has had conversations with Chair Joseph's office and offered edits and suggestions to this reporting bill. We write now to highlight two additional, critical data points that should be added to the proposed legislation. The first involves students who do not have an IEP or 504 Plan but are entitled to an MDR because their schools are "deemed to know" that they have a disability. The "deemed to know" criteria includes (i) when a student's parent expressed in writing a concern that their child needs special education services or submitted a written evaluation request; (2) when the student's behavior in school suggested the need for special education services; or (3) when a student's

teacher or other school personnel expressed concern about the behavior. Criteria (2) and (3) reflect the IDEA's Child Find requirement that schools are obligated to identify, evaluate, and develop services for students who may have a disability.

We often represent students without IEPs or 504 plans at the time of the incident for which they were suspended. However, more often than not, their schools had ample evidence suggesting the presence of a disability before the suspension. They may have also experienced classroom removals or principal suspensions, which, in combination with shorter suspensions, cumulatively meet the more than 10 day threshold. These students are almost guaranteed to *not* be identified as "deemed to know" unless they have advocates to make that case. The absence of an MDR not only keeps students with unidentified disabilities out of school for longer but also forecloses the opportunity for these students to receive expedited special education evaluations as required by the IDEA. Collecting data on how many students are classified as "deemed to know" and the outcomes of their hearings will provide valuable evidence of how schools view students who do not yet have IEPs as compared to those who do.

For both identified and "deemed-to-know" students, an advocate's presence at an MDR can make the difference between favorable and unfavorable determinations. We believe that collecting data on the outcomes of MDRs when student do or do not have an advocate is crucial to understanding where additional work must be focused to ensure that students receive MDR decisions that are legally sound and supported by the evidence. Our specific request is that the worksheet is amended to add two more factors: does the student have an IEP or a 504 Plan, or is the student considered "deemed to know;" and did the student have an advocate.

The second important data point we urge the Council to add would require schools to indicate the disability classifications of students with IEPs. We often see that behavior for students with "academically focused" classifications on their IEPs (e.g. Learning Disability or Speech-

Language Impairment) is less likely to be considered a manifestation than if the classification is Emotional Disability or Other Health Impairment. New York IEPs only have room for one primary classification, but many students have additional diagnosed disabilities that impact learning, and the interplay between them can be highly complex. Thus, the MDR Worksheet clearly states that classification is only one data point in the total MDR analysis.

Nonetheless, we continue to attend MDR hearings where school staff will automatically make a finding of non-manifestation when, for example, a learning disabled student acts out to avoid instruction or explodes from frustration with academic challenges. Thus, we request that the IEP classification is added to the MDR worksheet and recorded as an additional data point.

2. Transfer Schools

Education is the single most effective route to lift families out of poverty and it is therefore imperative for the wellbeing of our young people and New York City, that there be sufficient opportunities for these youth to connect with school programs where they can receive an education that will lead to positive outcomes, including higher education, vocational training and employment.

In our work at the Legal Aid Society, we meet many young people who have become disengaged with their education due to trauma, foster care placement, unstable housing, academic challenges, or a plethora of other life experiences that have interrupted their education. According to DOE reporting in school year 2023-24, nearly 1/3 of 7th and 8th graders were chronically absent. Between 33.8 and 45% (depending on grade) of high school students were chronically absent.¹ ACS' report on school attendance rates of students in foster care, shows similarly dismal rates of chronic absenteeism with 34% of students in care between the ages of 16 and 20 years old being chronically absent.²

Once disengaged from school, it is very difficult for a young person to return to a space

where they feel not only behind academically, but may also feel shame around past failures, or being older than their peers. For students trapped in middle school, the shame around attending school around much younger peers can be even more acute.

New York City Restart Programs and Transfer Schools serving overaged undercredited students provide a vital lifeline allowing young people to reengage in their education and get back on track. Students who enroll in Restart programs are able to gain essential skills that allow them to continue to high school. However, the demand for these programs far exceeds the number of available seats. City wide there are only six middle school locations with about 25-30 students per site – leaving too many students with no alternatives. Expanding Restart can help students get back on track early, and expand their options for high school.

When a high school aged young person enrolls in a Transfer School, they get a fresh start with dedicated staff and other students who have faced similar challenges. We have worked with many young people who, given a second chance, are able to complete their educations, gain skills through Learning to Work programs, and move on to vocational or higher education programs. Unfortunately, like the Restart Program, space in these beneficial programs is extremely limited, which leads to many young people who need the program being unable to secure a seat.

Due to the scarcity of seats, and of funding necessary to fully support students with disabilities, some Transfer Schools will not consider enrolling students with disabilities or with a history of poor attendance – the very students these programs were created to support. Other Transfer Schools condition acceptance on an agreement to remove, reduce, or change special education services to reflect what the school can provide. We are concerned that desperate parents of disengaged students and the students themselves will feel coerced, setting the stage for more school failure and disengagement. Flexible locations and times for service provision could ensure that students do not lose needed supports.

To facilitate the enrollment of interested students, we ask both for additional funding for Transfer Schools to create additional locations and seats. We also ask New York City Public Schools to provide greater transparency around the admissions process (perhaps through creation of a common application such as that used by many colleges) to facilitate the process for interested families and students.

We thank the Education Committee and City Council for their past support of Restart programs and Transfer Schools and we ask that they continue to be funded at a level that allows for them to expand, so that more students can take advantage of the programming that they offer.

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MELINDA ANDRA
Attorney-in-Charge, Education Advocacy Project

JOEL PIETZAK
Staff Attorney
Education Law Project

November 3, 2025

Urban Dove
Jai Nanda, Executive Director
Committee on Education
Oversight – Transfer Schools
October 30, 2025

Public Transfer high schools enroll Overage / Under-credited high school students, giving them a combination of rigorous academic curriculum with hands-on, real-world vocational programs, college and career readiness programs and social/emotional supports that strive to give each graduate a high school diploma, a foundation for higher education, and the job skills needed to enter the world of work. These high need students attend both DOE transfer schools and public charter transfer schools.

Learn to Work is a DOE/City funded program that provides multi-year, renewable grants to Community Based Organizations to partner with Transfer high schools. All DOE Transfer high schools have, or are eligible to have, a CBO partner under this program. CBO partners provide critical youth development and support services that schools are not equipped to provide, including attendance intervention and support, internships, workforce/job training and college prep, social/emotional counseling and support, and trips, experiential learning and other enhancement activities

Since the program began, charter transfer schools have been denied a CBO partner in the Learn to Work program. Currently nine such schools, serving over 2,000 students in Brooklyn, Queens, Manhattan and the Bronx are being denied this crucial support.

Charter transfer school continually pressed Mayor DeBlasio to include charter transfers in LTW but no action was taken. In February, 2018 then-Bronx BP Eric Adams stepped up and supported the cause - sending a letter to Mayor DeBlasio and Chancellor Farina asking them not to discriminate against public school students. They did not respond. In fall of 2018 Mayor DeBlasio said he would include charters in LTW, but no action was ever taken.

Then in 2021, Mayor Adams and Chancellor Banks addressed this inequity and promised to include charter transfer schools in the next round of Learn to Work contracts. Again, however, this did not happen. Each year in office, Mayor Adams has agreed to keep this promise.

- Fall 2023 – Mayor’s office announces there will *not* be a new RFP for LTW, all contracts are simply extended one year – excluding charters from participating in the program
- Fall 2024 – Mayor’s office again promises an RFP is forthcoming and charter transfer schools will be eligible to participate. No RFP is issued
- May 2025 – charter transfer school students testify before the City Council Education committee asking for inclusion in the program, still no RFP has been issued

This exclusion from the LTW program continues to discriminate against the most vulnerable public school students in the city and denies thousands of at-risk youth the services they need and deserve. We ask that these inequities be addressed with the issuance of a new, include LTW RFP.



Committee on Education
TOPIC: Oversight – Transfer Schools
Thursday October 25, 2025

Testimony by
Analisa Vestil
Student at Liberation Diploma Plus High School

There was a time where I struggled with not only school problems but also personal issues. They said family always comes first but once I started applying that phrase into my life, I started losing track of where I placed myself and couldn't keep up, as if I was stuck in place. Don't get me wrong I love my family to death but I know it will hurt me worse to keep having myself to fail not only in school but also in life.

In my old school it was very much all chaos and mix ups, to the point where not a lot of people including me, got to receive the help that was really needed. At that point I felt as if I was about to give up. Until I was introduced to Liberation Diploma Plus, My second home and my safe space. As soon as I entered into my first year at Liberation I felt at peace, I started coming to school more, getting good grades, going to special events. Yeah for me there can be a little ups and downs here and there, but for the most part I feel like I am living the life up at Liberation.



**Repair the world
child by child**

I am very thankful for the Liberation staff and JCCA, because they really took the time to get to know me, making me feel respected, helping me with any personal and school issues, which created a new soft spot in my heart. The JCCA internship has played a big role in my life, helping me grow personally and professionally, creating many different opportunities and paths for me to take when leaving high school and entering the real world.

To be honest I've never seen a school that can do what liberation has done, and I'm very thankful to Liberation and The JCCA staff for allowing me to take a pause and reset and for seeing that best in me.



Committee on Education
TOPIC: Oversight – Transfer Schools
Thursday October 25, 2025

Testimony by
Augustin Escamilla
Student at Liberation Diploma Plus High School

Good afternoon, my name is Augustin Escamilla, and I attend Liberation Diploma Plus High School. Prior to enrolling here, I was heading down the wrong path. I was failing every single class, missing weeks of school at a time, and simply lacked motivation. The environment at my previous school felt robotic, I wasn't treated like a person, but ignored and neglected, defined by my grades. However, everything changed when I came to Liberation. I applied, was interviewed, and quickly felt like this was a place where I could truly thrive. Mr. Manny, the counselor who conducted my interview, took the time to understand who I am, learn about my goals, and discuss how I could achieve them. After touring the school and meeting some of the staff, I had a strong sense that this was the right environment for me. As I began attending Liberation, I continued to get to know the staff and familiarize myself with the school culture. In my first week, I went on a trip that proved to be extremely helpful. What I really appreciate about Liberation is the small school community where everyone knows each other, and the staff genuinely cares. It feels like a family here. Unlike my previous school, where I often felt invisible, at Liberation, if you miss school, someone is sure to reach out to your family directly to make sure you stay on track. They're committed to making sure you don't slip



**Repair the world
child by child**

through the cracks. Recently, JCCA conducted a check-in with all students, asking important questions about our home lives and mental well-being and assistance. Many of the staff members I've connected with have similar experiences and come from challenging backgrounds themselves, even having attended alternative schools. I am now on track to graduate in either June or August, depending on whether I complete extra work. Additionally, I've started thinking about going to college, thanks in part to conversations with Mr. Rashidat and Mr. O. After hearing from an FDNY firefighter who visited our class, I'm considering pursuing a career with the Fire Department. These are dreams I never would have imagined for myself while I was at my previous school. Liberation has truly given me and many other students a second chance at making something of ourselves. It's a place where I feel supported, motivated, and encouraged to strive for more than I ever thought was possible.



Committee on Education
TOPIC: Oversight – Transfer Schools
Thursday October 25, 2025

Testimony by
Lelah Tolbert
Student at Liberation Diploma Plus High School

Everyone who ends up at Liberation Diploma Plus will always have a memorable experience that brings growth to their life. My safe space, family, and a place to call home is Liberation Diploma Plus. I've had a memorable history with this school. They always make me feel appreciated and never left out. They greet us with "Good morning" asking if we're okay, tell us we are loved and that means a lot even if it doesn't show. I remember a time my entire apartment caught on fire while I was sleeping and I lost everything I owned to my name. I never mentioned anything to the school yet and I received calls and messages from the principal (Ms. Leong) and LTW staff the following morning because they saw it on the news. My principal called me to come to the school and gave me \$300 for anything I needed. At that time, I was still in shock but I appreciated that because I had nothing and didn't know where to start. Liberation has changed my life and I say this because coming from a school where everything is brushed to the side, not cared for, or chaotic it's what I needed I honestly feel like I should've started at liberation years ago and I wouldn't have gone through certain situations but its apart of growth and that's something they help me do always. I appreciate that they make time for every student to get to know them personally because that helps in situations where a student may be feeling down so they already know how to approach. I also want to mention a recent time where I was



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child by child**

going though it not having anywhere to stay, I was in a shelter for the first time in my life. I felt like my life was over. I had no place to lay in peace and I couldn't attend school because the shelter I was in was so far away. I came to school to let them know I might not be able to come for a while and I was really embarrassed explaining my situation because I've never been there before but they listened. I even cried which I don't do because they were so understanding while I was going through a lot of pain. The entire time I've been at this school the environment has impacted my learning as well because they take time to help students with work and make sure they make your learning a priority. Nobody is ever left out. Moral of the story Liberation is always there for times I feel lost or get off track to steer me in the right direction.



Committee on Education
TOPIC: Oversight – Transfer Schools
Thursday October 29, 2025

Testimony by
Melanie Poggi

JCCA LTW Internship Coordinator at Liberation Diploma Plus High School

Good afternoon, my name is Melanie Rose Poggi. I am the Internship Coordinator for the JCCA at Liberation Diploma Plus High School.

School and work are usually spaces where we understand there is pressure to present a perfect image of ourselves. Liberation is a school that relieves our students from this performance. At Liberation, we encourage our students to find power in their authenticity and vulnerability. Not only do staff and students share similar upbringings, but we work together as a team to build their character, enabling them to overcome any barriers. We understand that everyday life constantly redirects and deters us from our goals. This is especially challenging for youth to navigate in a large school, where they often feel lost and overlooked. We encourage our students to feel free to share any struggles that prevent them from focusing on school, no matter what they are, and we assist them in any way possible. Whether it's a conflict with family or friends, needing extra food at home, wanting a job to

contribute to the home, or just needing a moment to take a mental break from class, every student at Liberation knows they will find a staff member in the building who will listen and come up with solutions. Our personal relationships with our students give us the opportunity to see our kids as a whole individual, not just as students.

As the JCCA Internship Coordinator at Liberation, who understands what it's like to end up in a transfer school, my task is to provide students with work experience. But I also encourage our students to find their voice and be confident. We want our students to become strong advocates for themselves, their families, and their communities. We understand that a career or profession should be carefully selected based on the problem our students want to change in the world. Belief in themselves and in a cause larger than themselves is what will provide our students with life-long success, not just a job. Our individualized meetings with our students allow us the opportunity to provide a job site that aligns with their long-term career goals.

You've heard a few testimonies from our outstanding students here today. I would also like to also shine a light on two of our JCCA interns who are not here today, Melvi Aldama Lopez and William Maynard. Melvi showed interest in social work and education, which led her to intern at P.S. 188 in Coney Island. She shared that she wanted a full-time job after her internship. With encouragement from me and her Advocate Counselor, Ms. Sharrell, Melvi



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spoke up for herself and was offered a chance to work at the school after graduation. William Maynard showed interest in the medical field, which led him to intern with us at South Brooklyn Hospital. After graduating, he got a full-time job in the Department of Transportation. In July 2025, he was named Employee of the Month and featured in their digital magazine.

These success stories remind us why the work we do at Liberation matters. Our students are not just learning how to earn a paycheck, they're learning how to believe in themselves, speak up, and pursue meaningful futures. Watching them grow into confident young adults ready to take on the world is the greatest reward. At Liberation, we don't measure success by grades or titles, but by the courage our students show every day to keep moving forward.



**Repair the world
child by child**

Committee on Education

TOPIC: Oversight – Transfer Schools

Thursday October 29, 2025

Testimony by

Nylah Jones

Student at Liberation Diploma Plus High School

Hello my name is Nylah Jones. I came to a point in my life where I felt like I didn't want to go to school. I wasn't getting good grades and it caused my motivation to be low. Because I was making a 3.00 GPA, I felt like I wasn't really worrying about school. They didn't tell me a lot of things and my friends weren't helping. They would skip school and just stay home. So, I felt like I should do the same. Until I felt like that's just my friend's life. Me? I want to become something in life. Be more independent and not needing any one. First, I was thinking about not finishing school anymore but then I felt like you can't get anything in life without having a high school diploma. My best friend told me there was a school called Liberation where you can get your diploma and get out of school faster. When I came to Liberation to fill out an application, they told me about the internship that helps us find jobs while we go to school. I liked the sound of that because the internship gave me another reason to come to school. It motivates me when I have people that care about me in school. Like Ms. Poggi, who accepted me into the JCCA internship program. The internship gives me lot of preparation for adult life. In my old school, they never asked me how I feel or what I wanted to do. At Liberation, I feel welcome. I am happy I heard of Liberation because now I still want to go to college and now I feel like I can do my dream and finish becoming who I want to be.



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child by child**

Committee on Education

TOPIC: Oversight – Transfer Schools

Thursday October 29, 2025

Testimony by

Rico St. Hilaire

Graduate of Liberation Diploma Plus High School

The JCCA internship program is very helpful for students because it prepares us for life after school. It gives us responsibilities (like coming to school on time, getting good grades, and handling conflict correctly), we get work experience and most importantly we get paid. We aren't treated like kids, we're treated like adults and we're expected to act that way. Every two weeks, Ms. Poggi holds these group meetings with all the interns, where we get split up into groups and do many different types of activities. We have been able to improve our team building skills, interpersonal skills through interviewing each other talking about life and what type of person we wanted to become. I wouldn't be where I am now if it wasn't for the internship.



Committee on Education
TOPIC: Oversight – Transfer Schools
Thursday October 25, 2025

Testimony by
Timothy He
Student at Liberation Diploma Plus High School

My name is Timothy, and I'm currently at Liberation Diploma Plus. Before I came here, I went to New Utrecht High School. During my time there, I felt like I wasn't heard when I needed help. Whenever I struggled, they just moved on, and I ended up feeling unmotivated to go to school. This went on until my sophomore year. I rarely showed up, and when I did, I found it boring and hard to stay engaged. One day, my counselor suggested I transfer to an alternative school to give me a better chance of graduating on time and earning my credits. At first, I thought Liberation would be just like any other school, only with more work since they told me I'd earn more credits than at a regular high school. But when I started at Liberation, everything changed. The staff made me feel welcomed in a way I had never experienced before. If I needed to talk about something, they didn't just listen passively or brush me off — they actually engaged with me and helped me. For the first time, I felt heard and supported. Before coming to Liberation, I didn't see the point in trying, but here, I felt motivated again. I



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started showing up every day and felt like a new person. The school provided me with the help I needed to understand my work, and they didn't just focus on academics. They took the time to talk to me about my future — what I wanted to do, and how to prepare for my career. It was something I hadn't seen at any other school, and it made a huge difference in how I viewed my education and my life. After being here for a little over a year, I got into the JCCA internship program, and I'm really grateful for it. It gave me a glimpse of what adulthood and working are like. The experience has taught me new responsibilities, and it fits into my schedule in a way that doesn't overwhelm me. It's been a real eye-opener and has prepared me for the real world. Without Liberation, I honestly don't think I would have achieved the things I've accomplished or developed the skills I now have. The teachers and counselors here have been instrumental in helping me realize my potential, and I'm truly thankful for all the support they've given me.

Good morning, everyone,

My name is Alyssa Vasquez, and I'm a proud alumni of New Ventures Charter School. I once sat in a classroom not knowing what my future would look like—and now I'm here speaking on behalf of students who deserve every opportunity to build one.

When I came to New Ventures, I wasn't just looking for a school—I was looking for a place that believed in me. Traditional schools didn't fit my life. I had responsibilities and challenges that made it hard to show up the way others expected. But New Ventures saw me for who I was and who I could become.

They didn't ask, "*What's wrong with you?*" They asked, "*What do you need to succeed?*" That question changed everything.

New Ventures' mission is simple but powerful: to prepare disconnected and at-risk youth for success—not just academically, but as confident, capable young adults. One of the most transformative parts of this mission is our Learn To Work Internship Program, where students apply classroom learning in real workplaces.

But here's the truth: many of our students can't afford to take unpaid internships. Some work before and after school to help their families. I know that struggle firsthand.

During my time at New Ventures, I often worked overnight shifts, clocking out at 5 a.m. and showing up for class at 10. I was doing everything I could to help my family while chasing my dreams. No student should have to choose between supporting their family and pursuing their education. *When you grow up in a community where every dollar matters, your time has to matter too.*

Paid internships change that.

They give students the chance to focus on what matters—their education, growth, and future—without sacrificing their well-being. This isn't about handouts; it's about fairness. Our students bring real value to their placements and deserve real wages in return.

When students are paid, attendance and engagement rise. They take pride in their work and begin to see themselves as professionals. I know, because that internship experience changed my life.

It gave me confidence, purpose, and a path. That experience led me to my dream job of working with children. Now, I am leading my very own classroom, where I was once learning as a student intern teaching assistant. I hope to impact students the same way. That's the power of opportunity.

We're not asking for luxury—we're asking for equity.

When we invest in youth, we invest in our city's future. Learn To Work resources given to transfer students will give all of our students living in this great city confidence, stability, and hope. It will remind them that someone believes in them.

New Ventures gave me a second chance, and my internship there gave me an opportunity.

Let's make sure every student who comes after me gets that same chance—with the dignity of giving them the proper resources for the incredible work they do, and to be proud of the work they do, and the difference they make. It is an honor to be a New Ventures Stingray.

Thank you for your time, your belief, and your commitment to our students. It's time to make an impact and the time is now.

Good morning,

My name is Olivia Vallario.

When I first started at New Ventures Charter School, I had no idea what my life would look like. I was nervous because school had always been hard for me. I tried my best, but I never felt like I truly fit in. Starting over was scary, but it became one of the best things that ever happened to me. This school gave me a second chance and helped me discover who I wanted to be.

Before I entered New Ventures, I was failing every class. I didn't believe in myself or think I could ever turn things around. But with the support of my teachers and the opportunities this school gave me, I went from failing every class to graduating with honors. That transformation changed my life and showed me what I was truly capable of.

When I joined the Learn To Work Internship Program, I didn't know what to expect. I was placed with a teacher who had once been an intern herself and was now working full-time at the school. Seeing how far she had come made me realize that this program could lead to real opportunities. It showed me what was possible and gave me the confidence to believe in myself.

Through this internship, I learned responsibility, patience, and how to build meaningful connections with students. It helped me find my passion for education and reminded me that I was capable of more than I ever thought. After graduation, I was hired at the same school, becoming one of the youngest staff members ever to work there at only 19 years old. That moment was a full-circle experience that made me proud of how far I had come and how powerful this program truly is.

Programs like this change lives. They give students purpose, real experience, and a reason to keep pushing forward. With proper funding and resources, this program could go even further and change more lives. It would allow all students (regardless of charter, transfer, public, etc) to earn money while they learn, helping them pay for college, housing, or family needs without having to choose between school and work. For many students, that support could be the difference between giving up and moving forward.

I am living proof that this program works. With the right resources, it can continue to open doors for more students and give them the same chance I had to turn potential into purpose. Now at 21 years old, I am pursuing my bachelor's and master's degrees in education. Sixteen-year-old me would have never believed this could be possible, but here I am chasing my dreams all because of the Learn To Work Internship Program at New Ventures. Let's change more "dreams" into "realities" and please allow all students the opportunity to be successful with charters receiving the same resources other students have. I'm sure by signing this RFP, we will change lives forever.

Thank you!



New Dawn Charter High School
Eimi Herrera Vasquez
Testimony Presented to the New York City Council Committee on Education
Oversight-Transfer Schools
October 30,2025

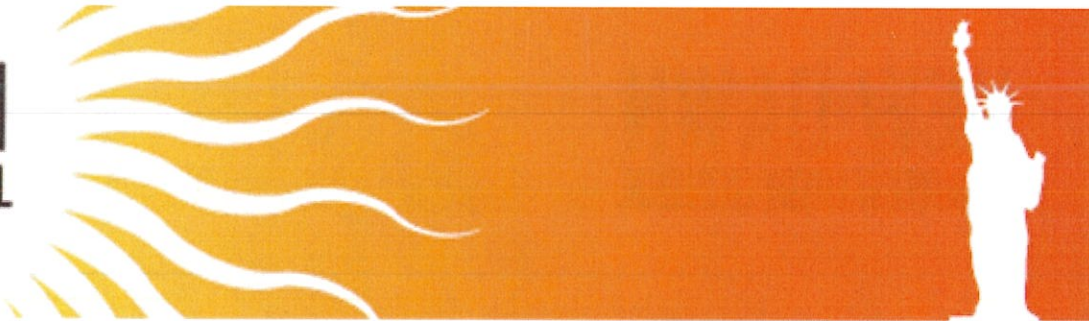
Good Morning Everyone, My name is Eimi Herrera. I am 17 years old, and I go to New Dawn Charter High School in Brooklyn. Before I begin, I do want to take the opportunity to say thank you for giving me the opportunity to share my story. Prior to attending New Dawn charter high school, I was a student at FDR high school. When I first entered FDR, I was a good student until I started hanging out with the wrong crowd. My academics started taking a turn for the worse, I became distracted and lost focus. School was not a place that I enjoyed going to anymore. I would miss classes because I did not like going to school which ultimately led me to failing my classes.

At that point, it felt like I was throwing my dreams away just to fit in with the crowd. This was also a difficult time for my mom who did not know what to do. While exploring new options for me to go to school, one of my teachers suggested that I attend New Dawn Charter High School. This was one of the best decisions ever because they supported students like me who had so much potential to succeed but needed a new start.

Since attending New Dawn, I have become a much better student and person in general. I have A's in my classes and nearly perfect attendance. I feel supported by my teachers and have been learning career skills through my internship program as well. This helps me better prepare me for my future career which puts me a step ahead once I graduate from high school.

While at New Dawn, I found out that the Learn to Work program was not offered in transfer charter schools due to funding being limited to only public schools. I do believe that transfer charter schools do a great job in helping students like me succeed and that we should be given the same resources and access to this program as other public schools who have Learn to Work.

I am here today to advocate not just for myself but for other students like me who attend transfer charter schools and would greatly benefit from Learn to Work. Education is a gateway to success, and what better way to prepare us for our futures by giving all of us access to the same resources to help us excel. Me attending a transfer charter school, should not exclude me from the benefits offered by the Learn to Work program. I am sharing my testimony in the hopes that you will



consider giving me and other students like me access to these programs that give so many other students a start towards having a successful future.

Good Afternoon. My name is Josiah Irizarry. I am 17 years old and I am finishing my second year at Urban Dove Team Charter School II Bronx, a transfer school for Overaged / Under-credited students. I started my high school career at Bronx Bridges Highschool but I struggled there and fell behind. There was a lot of bullying that became overwhelming and stopped me from focusing on school. My counselor told me about a DOE Transfer School called Bronx Regional Highschool that was smaller and could better support me because they had a program called Learn to Work that offered a lot of services like Internships, College support, and counseling. When I went there, though, they told me they were worried about my attendance from my prior school. The interview process was also very cold, and I was not sure that I would get the support I needed. However I soon found out about Urban Dove - a charter transfer school. They didn't care about my previous attendance, and they made me feel like I would be safe. They accepted me and I love this school and am doing much better. It is not an easy path but I am working hard and gaining confidence in myself. But when I got to Urban Dove and asked about Learn to Work, I was told they don't get the Learn to Work program because they are a charter school - how is that fair? If Bronx Regional had taken me I would get Learn to Work, but because they wouldn't and Urban Dove would, I don't get it? It makes no sense. I am still me, what difference does it make which public school I attend. All Overaged/Under-credited public school students who are working hard to get back on track deserve the same support. Thank you.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1359 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Nelson Mar
Address: Bronx Legal Services 349 E 149th St. Bx
I represent: Bronx Legal Services
Address: 349 E. 149th St.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1359/1360 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/2025

(PLEASE PRINT)

Name: Jessica Balistreri
Address: 2125 Broad St 10004 NY, NY
I represent: The New York Civil Liberties Union (NYCLU)
Address: same

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1359 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Joel Pietrzak
Address: 2090 Adam Clayton Powell Jr. Bld. NY, NY
I represent: The Legal Aid Society
Address: 10027

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Kristen Harris

Address: _____

I represent: NYCPS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1359 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Anna Arkin-Gallagher

Address: 177 Livingston St-7th Fl, Bklyn NY 11201

I represent: Brooklyn Defender Services

Address: 177 Livingston St-7, Bklyn NY 11201

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Josiah Irizarry Student

Address: [REDACTED] Bronx NY 10455

I represent: urban dove

Address: [REDACTED] Bronx NY 10455

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

☐ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: JAY NARDA

Address: [REDACTED] LIC, NY 11101

I represent: NYC URBAN DOVE

Address: [REDACTED] LIC, NY 11101

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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: 10/30/25

(PLEASE PRINT)

Name: LARA LAI

Address: 1 CENTRE ST 5th FL

I represent: NYC COMPTROLLER BRAD LANDER

Address: 1 CENTRE ST 5th FL

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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: 10/30/25

(PLEASE PRINT)

Name: RYAN MELIS

Address: 1441 South Ave. / 4 EVANS Way, Monroe, NJ

I represent: Integration Charter Schools

Address: 1441 South Ave.

**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: _____

Name: Andie Corso (PLEASE PRINT)
Kim Ramones

Address: NYCPS

I represent: NYCPS

Address: _____

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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: _____

Name: Andie Corso (PLEASE PRINT)

Address: _____

I represent: NYCPS

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

Name: Joseph Luft (PLEASE PRINT)

Address: _____

I represent: NYCPS

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Flavia Puella Perdomo

Address: _____

I represent: NYCPS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: John Sullivan

Address: _____

I represent: NYCPS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Melanie Mac

Address: _____

I represent: NYCPS

Address: _____

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Fimi Herrera

Address: _____

I represent: New Dawn charter high school

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Joel Peitrzak

Address: _____

I represent: Legal Aid Society

Address: _____ (HPA)

**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: Rohini Singh

Address: _____

I represent: Advocates for Children

Address: _____ (HPA)

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jessica Balistreri

Address: _____

I represent: NYCLU

Address: _____ (HPA)

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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: Nelson Mar

Address: _____

I represent: LSNYC

Address: _____ (HPA)

**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 Arkin - Gallagher

Address: _____

I represent: Brooklyn Defenders

Address: _____ (HPA)

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**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: NYCRS

Address: _____

Staff
with
students

**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: 10/30/25

(PLEASE PRINT)

Name: Melanie Poggi

Address: _____

I represent: _____

Address: _____

STUDENT

**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: 10/30/25

(PLEASE PRINT)

Name: Agustin Escamilla Jr

Address: _____

I represent: _____

Address: _____

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

STUDENT

**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: 10/30/25

(PLEASE PRINT)

Name: Rico St. Hilaire

Address: _____

I represent: _____

Address: _____

Student

**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: Nylah Jones

Address: _____

I represent: _____

Address: _____

Student

**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: Analisa Vestal

Address: _____

I represent: _____

Address: _____

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1359 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/30/2025

(PLEASE PRINT)
Name: Rohini Singh

Address: _____

I represent: Advocates for Children of New York

Address: 131 West 30th St 5th Fl New York, NY 10001

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)
Name: Leibh Talbert

Address: _____

I represent: _____

Address: _____

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**THE COUNCIL
THE CITY OF NEW YORK**

Student

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Timothy He

Address: _____

I represent: _____

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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☒ in favor ☐ in opposition

Date: 10/30/25

(PLEASE PRINT)

Name: Christopher Leon Johnson

Address: Sellman

I represent: _____

Address: _____

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