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THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

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2 **SUBJECT:** Draft Policy Statement on Promoting Diversity, Equity, and  
3 Integration in New York State

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**SUMMARY**

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8 **Issue for Discussion**

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10 Continued Board input on a draft policy statement on Promoting Diversity, Equity,  
11 and Integration in New York State.

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13 **Reason(s) for Consideration**

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15 Despite a decade of progress and many instances of excellence, New York's  
16 educational system today faces two critical problems that demand urgent attention:

17

- 18 • First, we face a great divide in educational opportunity and achievement along
- 19 lines of race, ethnicity, sexual orientation, gender identity, special learning
- 20 needs, family income, home zip code, language barriers, and citizenship status.

21           • Second, New York – and the nation – are not keeping pace with growing  
22           demands for still more knowledge and skill in the face of increasing competition  
23           in a changing global economy.

24

25           Closing the achievement gaps must begin with the fundamental belief that all  
26           learners can reach higher standards. It requires that we set high expectations and employ  
27           powerful strategies that build on the success of many University of the State of New York  
28           (USNY) institutions that are working to close these gaps.<sup>1</sup>

29

30           The push toward socioeconomic and racial integration is perhaps the most  
31           important challenge facing American public schools. Segregation impedes the ability of  
32           children to prepare for an increasingly diverse workforce; to function tolerantly and  
33           enthusiastically in a globalized society; to lead, follow, and communicate with a wide  
34           variety of consumers, colleagues, and friends. The democratic principles of this nation  
35           are impossible to reach without universal access to a diverse, high-quality, and engaging  
36           education.<sup>2</sup>

37

38           The mechanics of educational segregation operate both as structural barriers  
39           around access and resources and as internal functions of racism embedded in school  
40           policy and practice. These mechanisms have implications for achievement and  
41           opportunity, and perpetuate disparities among students based on race, ethnicity, sexual

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<sup>1</sup> <http://www.oms.nysed.gov/plan05/plan05.htm>

<sup>2</sup> Potter, H., Quick, K., & Davies, E. (2016, February 09). A New Wave of School Integration: Districts and Charters Pursuing Socioeconomic Diversity (Rep.). Retrieved [https://s3-us-west-2.amazonaws.com/production.tcf.org/app/uploads/2016/01/29103335/ANewWave\\_Potter.pdf](https://s3-us-west-2.amazonaws.com/production.tcf.org/app/uploads/2016/01/29103335/ANewWave_Potter.pdf)

42 orientation, gender identity, special learning needs, family income, home zip code,  
43 language barriers, and citizenship status.

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45 **A Call to Action**

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47 The Board of Regents looks forward to working with districts across the State to  
48 support their integration efforts. The New York State Education Department (NYSED)  
49 respects the value of integration and has supported such efforts most notably through the  
50 Socioeconomic Integration Pilot Program (SIPP) grants.<sup>3</sup> High-quality early childhood  
51 education is the only intervention that has shown a higher return on investment than  
52 socioeconomic and racial integration.<sup>4</sup>

53

54 Several districts in New York State already have made efforts to integrate their  
55 schools. For example, the White Plains School District has been implementing a  
56 controlled choice enrollment policy for nearly 30 years. The District's emphasis on school  
57 diversity, parent choice, and magnet school themes resulted in an integrated student  
58 body. The Rochester City School District has made recent efforts to grow its Urban-  
59 Suburban Interdistrict Transfer program through a NYSED SIPP grant to work with  
60 suburban districts. Other districts are using new strategies, such as Freeport School  
61 District, which provides two-way bilingual programs in all of its elementary schools to  
62 integrate schools.

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<sup>3</sup> NYSED Press Release, "NYS Schools to Receive Grants to Promote Socioeconomic Integration," Dec 30, 2014, available at <http://www.nysed.gov/news/2015/nys-schools-receive-grants-promote-socioeconomic-integration>.

<sup>4</sup> Kahlenberg, R. (2012). All Walks of Life: New Hope for School Integration. *American Educator*, 36(4),

64 In New York City, several Community Schools Districts (CSDs) are developing  
65 plans that are designed to create schools that feature academic as well as socioeconomic  
66 diversity. Furthermore, some of these districts, such as CSD1 on the lower East Side;  
67 CSD3 on the Upper West Side, Morningside Heights and Harlem; and CSD15 in  
68 Brooklyn, have worked with NYC DOE as well as local elected officials to ensure that the  
69 diversity created at schools under each new plan will come with resource-rich supports  
70 such as guidance and social workers as well as academic supports [need citation].  
71

72 These are just a few examples of integration efforts already underway in New York  
73 State. Because the Board of Regents recognizes that there is no “one right way” or single  
74 approach to effective integration, the Board encourages all districts and schools to adopt  
75 existing or develop new integration strategies that fit the needs of their students and  
76 communities.  
77

78 To support these efforts, the Board of Regents will continue to incorporate  
79 integration strategies into its Boys and Young Men of Color initiative and shall seek State  
80 funding to support research-based efforts by school districts to integrate their schools.  
81 Working together, we can ensure that New York State becomes an integrated school  
82 system that provides high-quality learning opportunities and culturally responsive school  
83 environments for all students.  
84

85 **Supporting Background Information**  
86

87 Shifting demographics in the US population, and particularly in New York, are  
88 bringing this issue into sharper focus. Currently, five states are considered to have a  
89 “minority-majority,” where the White, non-Hispanic population represents less than 50%  
90 of the population. New York is among eight more states that are trending in this direction,  
91 with White non-Hispanics representing less than 60% of the population<sup>i</sup>. As of 2016,  
92 students in New York State public schools were one percent American Indian, two percent  
93 multiracial, nine percent Asian or other Pacific Islander, 18 percent Black, 26 percent  
94 Latino, and 45 percent White. Additionally, eight percent of the State’s students are  
95 English Language Learners representing approximately 200 different native languages  
96 other than English [need citation], 17 percent are students with disabilities, and 52 percent  
97 are eligible for free or reduced-price lunch.<sup>5</sup> The current poverty threshold is defined as  
98 \$24,858 for a family of four<sup>ii</sup>. Note that some students may fall into two or more of these  
99 categories [need state data on students that fall into multiples categories].

100  
101 Not all children in the State are able to take advantage of this rich diversity. More  
102 than 60 years after *Brown v. Board of Education*, New York is the most segregated state  
103 in the country. In 2010, over half of Black and Latino students in the State attended  
104 schools with less than ten percent White enrollment, and the typical Asian student in the  
105 State attended schools in which a little over 30 percent of their peers were White.<sup>6</sup> In that  
106 same year, the average White student attended schools in which close to 80 percent of  
107 his or her classmates were White.<sup>7</sup> Further, in 2010, the average White student attended

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<sup>5</sup> NYSED's Student Information Repository System (SIRS) 2015-2016 Demographic Data, available at: <https://data.nysed.gov/enrollment.php?year=2016&state=yes>.

<sup>6</sup> Kucsera, J., & Orfield, G. (2014). New York State’s Extreme School Segregation: Inequality, Inaction and a Damaged Future. p 35, 48, *UCLA Civil Rights Project*, available at: <https://www.civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/ny-norflot-report-placeholder/Kucsera-New-York-Extreme-Segregation-2014.pdf>.

<sup>7</sup> *Id.* p 41.

108 a school in which 30 percent of his or her classmates were low-income, while the average  
109 Black and Latino student attended a school where 70 percent of his or her classmates  
110 were low-income.<sup>8</sup>

111 [the concentration of students in the foster care system in low income districts]

112 Families with school age children have struggled to participate in the economic  
113 recovery that followed the Great Recession. Statewide, the number of homeless  
114 schoolchildren increased by 30% between the 2010-11 and 2014-15 academic years<sup>iii</sup>.  
115 Outside of New York City this number increased by 50% during that period to record  
116 levels<sup>iv</sup>. Within New York City, the number of homeless students has ballooned to more  
117 than 114,000, or roughly one in 10<sup>v</sup>.

118  
119 There is an intersection between homelessness and other subgroups.  
120 Approximately 40% of homeless youth self-identify as LGBTQ<sup>vi</sup>. Moreover, LGBTQ  
121 homeless youth tend to be disproportionately of color<sup>vii</sup>.

122  
123 Struggling families with school age children do not necessarily reside exclusively  
124 in urban centers, nor are they necessarily people of color. Currently, 11% of all New  
125 York's students attend schools in rural areas<sup>viii</sup>. Of the five lowest income counties in New  
126 York, only one (Bronx County) is within an urban center. The remaining four counties  
127 (Wyoming, St. Lawrence, Allegany and Franklin) are located in the rural North Country  
128 and Western New York. According to the 2010 Census, each of five counties had per  
129 capita income ranging from \$17,575 (Bronx) to \$20,605 (Wyoming). Further, the ethnic  
130 makeup of the Bronx most closely resembles that of New York State as a whole, with

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<sup>8</sup> Id. p vii.

131 45.8% white, 43.3% black or African American, 4.2% Asian, 3.0% American Indian, 0.4%  
132 Pacific Islander, and 3.3% of two or more races; 54.6% of the population was of Hispanic  
133 or Latino origin. The other four counties have white populations ranging from 84.03%  
134 (Franklin) to 97.03% (Allegheny), with blacks / African Americans comprising 0.72%  
135 (Allegheny) to 6.63% (Franklin), and Latinos or Hispanics of any race representing 3% or  
136 less in these counties. Franklin County has the highest Native American population of  
137 these five counties at 6.20%.

138  
139 But demographics alone do not tell the whole story in laying out the challenge that  
140 lies before us. There are extreme inequities across the state with regard to school-based  
141 resources. They include, but are not limited to, disparities in access to the following: arts  
142 programs, highly qualified and/or experienced teachers, rigorous / college preparatory  
143 and/ or CTE coursework, post-secondary advisement including college and career  
144 opportunities; social-emotional supports and culturally responsive pedagogy.

145  
146 For example, in New York City and other large city districts, only about half of  
147 schools offer Physics. Offerings of Algebra and Calculus are even more abysmal with  
148 only 47% of New York City schools offering Algebra and 41% offering Calculus; within  
149 large city districts only 33% of schools offer algebra and 37% of schools offer calculus.  
150 About a fifth of high needs rural school do not offer Calculus. About half of New York City  
151 schools do not offer Advanced Foreign Language or Music. About a third of schools in  
152 high need rural districts do not offer International Baccalaureate or Advanced Placement  
153 courses. The same is true for about one fifth of New York City and other Large City District  
154 schools<sup>x</sup>.

155

156 Supports for students with special needs are also lacking. In New York City, more  
157 than 375 schools have 25 or more homeless students on their rolls yet have no social  
158 worker<sup>x</sup>. Moreover, only 18.4% of school buildings in New York City are considered to be  
159 fully accessible to individuals with physical disabilities<sup>xi</sup>.

160

161 Some supporters of equity are parents of color who assert that, given adequate  
162 resources, their children do not necessarily have to be educated alongside white  
163 children to succeed academically. A striking example of this is an open letter addressed  
164 New York City Mayor Bill DeBlasio from a group called Parenting While Black. They  
165 write (emphasis added): “[W]e want an education policy that focuses on addressing the  
166 barriers to equitable education that create racially disparate outcomes [...] Schools  
167 should have the resources to provide a quality education to students at all levels [...]  
168 [W]ork with school administrators to ensure they have the necessary support to align  
169 their budgets with improving school outcomes in a way that acknowledges and is  
170 responsive to the cultural academic needs of Black children [...] **Every student in New**  
171 **York City should be able to attend a good school within walking distance.**”<sup>xii</sup>

172

173 A rich body of research, including a number of high-quality studies, shows that –  
174 other factors being equal – schools that are racially, economically, and academically  
175 segregated produce lower educational achievement and attainment for children. Children  
176 in segregated schools are more likely to be children of color and low-income students  
177 than those attending schools with less segregation, which in turn limits lifetime  
178 opportunities for students.<sup>9</sup> The same body of research shows that increased

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<sup>9</sup>Kucsera, J., & Orfield, G. (2014). New York State’s Extreme School Segregation: Inequality, Inaction and a Damaged Future. p 29, *UCLA Civil Rights Project*, available at: <https://www.civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/ny-norflot-report-placeholder/Kucsera-New-York-Extreme-Segregation-2014.pdf>.



179 socioeconomic and racial integration results in the following benefits among students of  
180 color and economically disadvantaged students, again, without negatively affecting  
181 results for other students:

- 182 • Leads to higher academic outcomes for students of color and economically  
183 disadvantaged students without compromising outcomes for other students;
- 184 • Closes the achievement gap between students of different racial and ethnic  
185 backgrounds;
- 186 • Fosters critical thinking skills and the ability to communicate and work with  
187 people of all backgrounds;
- 188 • Reduces racial and ethnic prejudice while increasing cross-cultural trust and  
189 relationships;
- 190 • Decreases the likelihood of teenage pregnancy and interaction with the juvenile  
191 justice system; and
- 192 • Increases the likelihood of college-going and success in college.<sup>10</sup>

193  
194 There is a gap between the research demonstrating the benefits of integration and  
195 the reality of segregation in New York State. A recent study by the UCLA Civil Rights  
196 Project concludes that New York State has the most racially and economically segregated  
197 schools in the country,<sup>11</sup> and is home to some of the most segregated school districts  
198 nationwide.<sup>12</sup> In many schools in the State, segregation is increasing; with the proportion  
199 of New York State schools considered intensely segregated doubling between 1989 and  
200 2010.<sup>13</sup>

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<sup>10</sup> Wells, A.S., Fox, L., & Cordova-Cobo, D. (2016). How Racially Diverse Schools and Classrooms Can Benefit All Students, *The Century Foundation*, available at: <https://tcf.org/content/report/how-racially-diverse-schools-and-classrooms-can-benefit-all-students/>. See also Mickelson, R.A. (2016). School Integration and K-12 Outcomes: An Updated Quick Synthesis of the Social Science Evidence, *The National Coalition on School Diversity*, available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo5.pdf>.

<sup>11</sup> Kucsera, J., & Orfield, G. (2014). New York State's Extreme School Segregation: Inequality, Inaction and a Damaged Future. *UCLA Civil Rights Project*.

<sup>12</sup> Fessenden, F., A Portrait of Segregation in New York City's Schools, *The New York Times*, May 11, 2012, available at: <http://www.nytimes.com/interactive/2012/05/11/nyregion/segregation-in-new-york-city-public-schools.html>.

<sup>13</sup> Kucsera, J., & Orfield, G. (2014). New York State's Extreme School Segregation: Inequality, Inaction and a Damaged Future. *UCLA Civil Rights Project*.

202 Historically, the Board of Regents has promoted integration efforts, including ones  
203 championed by Dr. Kenneth Clark, who was the first black member of the Board when he  
204 was elected in 1966.<sup>14</sup> Dr. Clark was a life-long integration advocate, whose famous  
205 research on children’s reactions to black and white dolls in Clarendon County, South  
206 Carolina played a pivotal role in the 1954 Supreme Court decision in *Brown v. Board of*  
207 *Education*.

208  
209  
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211 **Proposed Definition of Equity**

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213 The New York State Board of Regents unequivocally believes that every child  
214 deserves and must have equitable access to high quality learning opportunities.  
215 There can be no educational excellence without educational equity.

216 Equity means every student will experience academic success without regard to  
217 differences in age, citizenship status, disability, ethnicity, gender, national origin  
218 race, native language, religion, sexual orientation, or socio-economic status. The  
219 varied learning needs of students are met in an environment where all students  
220 are valued, respected, and see themselves in culturally responsive-sustaining  
221 curriculum and instructional materials.

222  
223

224 **Statement in Support of Promoting Diversity, Equity, and Integration in New York**  
225 **State**

226

227 To respond to these findings and address the needs of our diverse community, the  
228 Board of Regents commits to promoting increased equity and integration within New York  
229 State’s public schools and embracing the State’s racial, ethnic, socioeconomic, linguistic,  
230 and ability diversity as an important educational asset.

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<sup>14</sup> Severo, R., Kenneth Clark, Who Fought Segregation, Dies, *The New York Times*, May 2, 2005, available at: [http://www.nytimes.com/2005/05/02/nyregion/kenneth-clark-whofought-segregation-dies.html?\\_r=0](http://www.nytimes.com/2005/05/02/nyregion/kenneth-clark-whofought-segregation-dies.html?_r=0).

232 The mission of the Board of Regents is to raise the knowledge, skill, and  
233 opportunity of all the children and adults in New York State. Goals recently articulated by  
234 the Board of Regents as part of the My Brother’s Keeper Initiative<sup>15</sup> include ensuring that  
235 all students:

236

- 237 1. Enter school ready to learn;
- 238 2. Read at grade level by third grade;
- 239 3. Graduate from high school ready for college and careers;
- 240 4. Complete postsecondary education or training;
- 241 5. Successfully enter the workforce; and

242

243 Promoting socioeconomic and racial integration is a powerful mechanism for  
244 achieving these goals. Based on careful consideration of substantial, well-validated, and  
245 longstanding social, scientific, and experiential evidence, the Board of Regents finds that  
246 integrated schools:

247

- 248 1. Enrich the educational experience of students;
- 249 2. Promote higher academic and many other favorable outcomes for all students;
- 250 3. Close the achievement gap for students of different socioeconomic and racial  
251 backgrounds;
- 252 4. Foster critical thinking skills and the ability to communicate and work with  
253 people of all backgrounds;
- 254 5. Advance postsecondary success and lifetime opportunities for all students; and
- 255 6. Graduate students prepared to succeed in an increasingly pluralistic society in  
256 which the more perspectives that can be brought to bear, the more problems  
257 people are capable of solving.<sup>16</sup>

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259 To achieve equity and integration, the Board of Regents is committed to the  
260 development and support of educational programs that promote the values of racial,  
261 ethnic, socioeconomic, linguistic, and ability diversity. The Board of Regents encourages

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<sup>15</sup> New York State, My Brother’s Keeper Initiative, <http://www.nysed.gov/mbk/schools/my-brothers-keeper>.

<sup>16</sup> New York State, My Brother’s Keeper Initiative, <http://www.nysed.gov/mbk/schools/my-brothers-keeper>.

262 districts and schools, to the greatest extent possible, to adopt integration plans that result  
263 in schools that reflect a diverse mix of students – of different *rac*es and *ethnicities*,  
264 *abilities*, *home languages*, and *socioeconomic status* – to ensure that schools, programs,  
265 and services reflect – thus obtain the full educational, instructional, and developmental  
266 benefit of – the diversity of the district and/or surrounding districts. Such strategies may  
267 include, but are not limited to:

268

269 ● Developing flexible integration and diversity targets and enrollment systems to  
270 ensure that each school generally reflects the demographic diversity of the  
271 district and/or surrounding districts;

272 ● Implementing classroom placement strategies to ensure that each classroom  
273 is diverse and that students receive the full educational and other benefits of  
274 diversity;

275 ● Applying an equity index algorithm, publishing data regularly to monitor whether  
276 integration goals are being met, and adjusting goals, policies, and practices in  
277 light of the evidence of how well they are succeeding and how they can be  
278 improved. The index identifies tracking, resource allocation, desegregation of  
279 suspensions/expulsions by age, gender, race, ethnicity, and home language;

280 ● Creating partnerships or regional districts or consolidating with nearby districts  
281 to address socioeconomic and racial isolation across districts;

282 ● Re-drawing school zones, strategically selecting new school sites, and creating  
283 un-zoned schools with weighted enrollment (e.g., enrollment preferences or  
284 weighted lottery) to increase integration;

285 ● Providing transportation and other logistical support to ensure that segregated  
286 housing patterns do not prevent students from attending integrated schools;

287 ● Investing in professional development to support instructional practices that  
288 reflect the tenets of culturally sensitive instruction and disciplinary practices;  
289 and/or

290 ● Developing employment practices that promote a culturally and ethnically  
291 diverse workforce.

292

293 For students to receive the full educational and other benefits of diversity, equity,  
294 and integration, not only should students attend integrated and/or diverse schools  
295 wherever possible, but integration, diversity and equitable practices should be woven into  
296 the fabric of each district's and school's culture. As such, to the greatest extent possible,  
297 districts and schools should consider integration, diversity and equity when making  
298 decisions about staff recruitment and training, pedagogy and curriculum, parental  
299 involvement efforts, and extracurricular activities. Specific strategies may include, but are  
300 not limited to:

- 301
- 302 • Soliciting community and parental feedback through accessible means and in  
303 multiple languages, and providing transparency in the development,  
304 implementation, and evaluation of integration strategies;
  - 305 • Developing programs that attract a diverse student body and meet the unique  
306 needs of students within each school;
  - 307 • Encouraging targeted staff recruitment efforts so that school staff reflect the  
308 diversity of New York State and that all students receive the educational and  
309 other benefits of that diversity;
  - 310 • Distributing resources within and across schools and programs according to  
311 students' needs; and
  - 312 • Providing professional development focused on culturally and linguistically  
313 responsive instruction and strategies to support integrated learning  
314 environments within each school.

315

316 **Desired Outcomes**

- 317 • Identify the opportunity-to-learn disparities many students face that appear to  
318 be based on race, ethnicity, sexual orientation, gender identity, special  
319 learning needs, family income, home zip code, language barriers, and  
320 citizenship status.
- 321 • **All** parents and families receive timely and complete information regarding  
322 children's rights and opportunities to learn as prescribed by state law and  
323 regulations.

- 324           • Identify the social, political, policy, and legal obstacles the NYS Board of  
325           Regents must confront to address these disparities and ensure all students  
326           have equitable opportunities to prepare for college, careers, and civic  
327           engagement.
- 328           • Utilize published and ongoing research studies to present research-based  
329           policies and best practices regarding socioeconomic and racial integration.
- 330           • Recommend to the Board of Regents how it can best prioritize socioeconomic  
331           and racial integration and create a vision for school districts and individual  
332           schools and encourage both schools and school districts to work together to  
333           create inter-school and inter-district solutions.
- 334           • Recommend to the Board of Regents and to elected officials at all  
335           governmental levels policies, legislation, and budgetary priorities to engage  
336           educational institutions as well as other city and state agencies in promoting  
337           diversity, equity, and integration.

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339   **Proposed Handling**

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341           This draft policy statement is being submitted to the P-12 Education Committee for  
342           consideration and discussion at the XXXX meeting of the Board of Regents.

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344   **Procedural History**

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346           At the April 2017 Board of Regents Meeting, the Department presented two “high  
347           concept ideas” regarding the promotion of socioeconomic and racial integration through  
348           its ESSA Consolidated State Plan. On May 9, 2017, the Board of Regents published its  
349           draft ESSA Consolidated State Plan for public comment. After an extensive, 18-month  
350           long public engagement process, the Department, with Board approval, submitted New  
351           York State’s ESSA plan to the USDE for review on September 17, 2018. On January 17,  
352           2018, the USDE approved the State’s plan that included provisions implementing those  
353           high concept ideas.

354

355           At the June 2017 Board of Regents meeting, the Department presented a draft  
policy statement on Promoting Diversity: Integration in New York State. Also at that

356 meeting, a Research Work Group was appointed to oversee the work of the Board and  
357 the Department to promote greater diversity and equity within New York State's schools  
358 and districts. At subsequent meetings of the Work Group, the policy statement has been  
359 revisited and refined.

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### 361 **Related Regents Items**

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363 Promoting Diversity: Integration in New York State, April 2017 Presentation to  
364 Board of Regents:

365 [http://www.regents.nysed.gov/common/regents/files/FB%20Tuesday%20-  
366 %20%20Promoting%20Diversity%20-  
367 %20Integration%20in%20New%20York%20State.pdf](http://www.regents.nysed.gov/common/regents/files/FB%20Tuesday%20-%20%20Promoting%20Diversity%20-%20Integration%20in%20New%20York%20State.pdf)

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369 Draft Policy Statement on Promoting Diversity: Integration in New York State,  
370 June 2017 Discussion Item:

371 <https://www.regents.nysed.gov/common/regents/files/617p12d5.pdf>

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### 373 **Recommendation**

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375 It is recommended that this be a continued discussion at the September Board of  
376 Regents meeting.

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### 378 **Timetable for Implementation**

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380 Next steps will be determined at the September Board of Regents meeting.

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<sup>i</sup> <https://www.census.gov/quickfacts/>

<sup>ii</sup> <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

<sup>iii</sup> <http://www.vocal-ny.org/wp-content/uploads/Rising-Homeless-in-New-York-State-2016-2.pdf>

<sup>iv</sup> <http://www.vocal-ny.org/wp-content/uploads/Rising-Homeless-in-New-York-State-2016-2.pdf>

<sup>v</sup> <https://www.nytimes.com/2018/10/15/nyregion/homeless-students-nyc-schools-record.html>

<sup>vi</sup> [http://williamsinstitute.law.ucla.edu/wp-content/uploads/Durso-Gates-LGBT-Homeless-Youth-Survey-  
July-2012.pdf](http://williamsinstitute.law.ucla.edu/wp-content/uploads/Durso-Gates-LGBT-Homeless-Youth-Survey-July-2012.pdf)

<sup>vii</sup> <https://scholarlycommons.law.northwestern.edu/cgi/viewcontent.cgi?article=1150&context=njlsp>

<sup>viii</sup> <http://www.centerforpubliceducation.org/system/files/Rural%20School%20Full%20Report.pdf>

<sup>ix</sup> <http://equityinedny.edtrust.org/wp-content/uploads/sites/14/2018/05/Within-Our-Reach.pdf>

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<sup>x</sup> [https://www.advocatesforchildren.org/sites/default/files/library/gaps\\_in\\_social\\_workers.pdf?pt=1](https://www.advocatesforchildren.org/sites/default/files/library/gaps_in_social_workers.pdf?pt=1)  
<sup>xi</sup> [https://www.advocatesforchildren.org/sites/default/files/library/access\\_denied.pdf?pt=1](https://www.advocatesforchildren.org/sites/default/files/library/access_denied.pdf?pt=1)  
<sup>xii</sup> ["Mayor de Blasio Isn't Even Trying to Deliver Good Schools for New York City's Blacks." Parenting While Black Open Letter to the Mayor. \*New York Post\*. September 9, 2018.](#)

DRAFT