



April 20, 2015

Chancellor Carmen Fariña and Deputy Chancellor Corinne Rello-Anselmi
New York City Department of Education
Tweed Courthouse
52 Chambers Street
New York, NY 10007

RE: Pending Reorganization to the Department's School Support Structure

Dear Chancellor Fariña and Deputy Chancellor Rello-Anselmi,

I am writing on behalf of the ARISE Coalition to share some thoughts about the pending reorganization to the DOE's school support structure. We are pleased to see the DOE moving away from the network structure that has proved confusing and often obstructive to parents of students with disabilities. We are hopeful that through the new structure, the Superintendents' offices and Borough Field Service Centers (BFSCs) will provide increased instructional, programmatic, operational, and financial support and oversight for schools and serve as places families can seek and obtain help securing appropriate supports for their children with special education needs. With that in mind, we make the following suggestions:

ARISE Coalition Members: Adaptive Design Association, Advocates for Children of New York, AHRC New York City, Cathy Albisa, Mark Alter, Steinhardt School of Culture, Education & Human Development, New York University, David C. Bloomfield, Brooklyn College and the CUNY Graduate Center, Bronx Independent Living Services, Bay Brown, Brooklyn Center for the Independence of the Disabled, Brooklyn Defender Services, Center for Hearing and Communication, Center for the Independence of the Disabled, New York, Citywide Council on Special Education, Citywide District 75 Council, Coalition for Educational Justice, The Cooke Center for Learning and Development, Ziograin Correa, Sr., M.S.Ed., Helene Craner, Ruth DiRoma, Disability Rights New York, Education Rights Project of the Partnership for the Homeless, Richard and Lora Ellenson, Everyone Reading, Inc., Families Helping Families, Ben Fox, Friends of the Children New York, The Go Project, Goddard Riverside Community Center, Olga Gonzalez, Jay Gottlieb, New York University, Carol A. Greenburg, Paul Hutchinson, Revere Joyce, The Learning Disabilities Association of New York State, Aurelia Mack, Matthew Mandelbaum, Shelly McGuinness, Bob McLoughlin, Diana Mendez, The Mental Health Association of New York, Metropolitan Parent Center of Sinergia, Inc., National Economic and Social Rights Initiative, Dana Neider, New Alternatives for Children, NYC Special Education Collaborative, New York Charter Parents Association, New York Lawyers for the Public Interest, New York Legal Assistance Group, New York Performance Standards Consortium, Jaclyn Okin Barney, Esq., Parents for Inclusive Education, Parent to Parent of New York State, Parent to Parent New York, Inc., Suzanne Peters, Samantha Pownall, Cathy Rikhye, Ed. D., Department of Curriculum and Teaching, Teachers College, Columbia University, Raphael Rivas, Resources for Children with Special Needs, Miguel L. Salazar, Jennifer and Peter Sellar, Iriss Shimony, Jon Sigall, Jo Anne Simon P.C., Karin Spraggs, Mark Surabian, MA, ATP, Instructor, Assistive Technologies, Pace Graduate School of Education, United Cerebral Palsy of New York City, United Federation of Teachers, United We Stand, Constance Van Rolleghe, RueZalia Watkins.

Coordinator: Maggie Moroff -- mmoroff@advocatesforchildren.org -- (212) 822-9523

School Support

1. We share the DOE's belief that some districts require more support than others. However, we also believe that each field and district office must have staff with specific instructional expertise and coaching ability to build capacity throughout the system in supporting:
 - Students who lack grade-level literacy skills and are struggling academically, and
 - Students who present with behavioral challenges
2. Furthermore, there should be expertise at each of the BFSCs in a number of other areas critical for students with disabilities. We would recommend that someone at each office have direct responsibility for:
 - Supporting schools around the Section 504 process
 - Making sure that transportation services for students with specialized needs are provided
 - Obtaining appropriate assistive technology supports and services
 - Supporting schools in applying Universal Design for Learning principles throughout their buildings
 - Ensuring that students with disabilities between the ages of 3 and 5 receive appropriate supports and services
 - Providing smooth transitions for students at several key points in their school careers – as they move from pre-kindergarten to kindergarten, from elementary to middle school, and from middle to high school
 - Guaranteeing that mandated transition planning occurs for students with IEPs to prepare them for life after high school, and
 - Liaising with District 75 to support those students who receive services from the citywide district
3. We understand that the Department plans to target schools for additional support based on data analysis. It has been our experience that while some principals welcome support from their networks and central DOE offices, others do not. We urge that this reorganization institutionalize considerably more authority over schools that prove resistant to providing appropriate supports for students with special education needs as demonstrated by data and requests for assistance from parents and advocates.
4. We also have concerns about the resources that will be allotted to the BFSC's. Over the years, we have seen a demonstrated need for support in the Bronx, and we are surprised to see that the borough will house only one BFSC while Brooklyn and Queens will each have two centers. We'd urge you to reconsider and build in further support for students, schools, and families in the Bronx.

5. Often when schools fail to provide necessary and appropriate services to meet the needs of individual students with disabilities, families are told by school staff that the lack of funding or difficulty obtaining funding plays a part in their decision-making processes. Under this reorganization, we hope to see an improved mechanism for funding support services for students with disabilities, including school staff (ICT, SETSS, related services at the school, paraprofessionals, etc.), assistive technology purchases and training, and Related Services Authorizations when services cannot be provided at the school during the school day.

Support for Parents

We are hopeful that restructuring the system will serve to improve the support received not only by schools, but also by parents, including parents of students with disabilities. To that end, we recommend the DOE identify a dedicated contact for parents of students with special needs at each school, district office, and BFSC and share widely information about how to contact those individuals. To do this:

1. Phone numbers and email addresses for those contacts should be made readily available to families. We recognize that the DOE is sometimes hesitant to share names of contacts – worrying about staff turnover – but we suggest that contacts for the individuals charged with these responsibilities at the district and field offices be assigned local equivalents of the specialeducationreform@schools.nyc.gov email and Special Education hotline used by the Division of Specialized Instruction.
2. This information should be shared publicly before the 2014-15 school year comes to a close so families who need assistance during July and August know where to turn.
3. Once a parent support system is set in place, it needs to be well publicized for families. Information about how families can seek assistance from their districts and BFSCs should be available online, sent home in backpacks before the close of school in June, and available in a wide range of DOE offices. We also recommend that the DOE conduct parent information sessions for parents who could benefit by hearing the information directly.
4. The DOE should post onsite directories at district offices and BFSCs so families seeking help know who to turn to when they show up or when they need to go elsewhere.

We welcome any more detail you can provide about staffing the districts offices and BFSCs. We are eager to know, for example: How many staff at each office will be dedicated to working with families of students with disabilities and to supporting schools working with students with disabilities, and what sort of professional development those staff will receive?

Finally, we have heard that the role of Parent Coordinators is expected to change with the reorganization. We would like more information about that pending change, particularly as it will affect the relationship between Parent Coordinators and parents of students with disabilities.

Thank you in advance for your attention. We would be very happy to talk with you further about our suggestions.

Sincerely,

A handwritten signature in blue ink that reads "Maggie Moroff". The signature is fluid and cursive, with the first name being more prominent.

Maggie Moroff
Coordinator of the ARISE Coalition