



June 24, 2021

Chancellor Meisha Porter
New York City Department of Education
52 Chambers Street
New York, New York 10007

Commissioner Bill Chong
New York City Department of Youth and Community Development
2 Lafayette Street, 19th Floor
New York, New York 10007

Delivered by Email

Dear Chancellor Porter and Commissioner Chong,

I am writing today on behalf of [The ARISE Coalition](#) to urge you to provide all students, including those with disabilities, with equitable access to the City's Summer Rising program. ARISE is a coalition of over 100 parents, advocates, educators and academics who have been working together since 2008 to push for systemic changes to bring about improved day-to-day experiences and long-term outcomes for students with disabilities in New York City. Time until the Summer Rising program begins is running out, and parents of students with Individualized Education Programs (IEPs) and plans pursuant to Section 504 of the Rehabilitation Act are still without critical information they need for their children to participate successfully.

Our concerns and suggestions are primarily around the second part of the day, which seems fraught with problems likely to prevent real inclusion of students with disabilities. Both the Department of Education (DOE) and Division of Youth and Community Development (DYCD) have a responsibility to address these problems – arranging safe transportation to and from the programs, fully preparing Community-Based Organization (CBO) staff so they can support and welcome students with disabilities to the new summer programs and providing families with all the information they need to know their children will be safe and supported at Summer Rising sites.

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Outstanding questions:

While the Office of Special Education has provided some greater detail than is currently available on the DOE's website in response to our outreach, our members have further questions, as outlined below:

Transportation:

- How will students whose IEPs require specialized busing get home from their afternoon enrichment activities? Without that transportation, and contrary to law and policy issued by the U.S. Department of Education, many will effectively be blocked from attending the afternoon programming.
- How will students who attend the DOE's District 75 programs and specialized non-public schools (NPS) serving students with disabilities -- both of whom often require significant travel -- get to afternoon activities in CBOs closer to home in time to enjoy the full spectrum of the enrichment hours?

Parent Communication:

- When can parents expect to learn the constellation of special education supports and services their schools have determined appropriate to support their children over the summer months in school and in enrichment activities? Will that information be provided to them in writing?

Enrichment hours:

- How will the City ensure that students with disabilities have real access to enrichment activities with the support of well-trained CBO staff?
- At the CBO level, will programs get additional support beyond the IEP/504 plan-mandated supports to individual students? We expect students will be wrestling with new emotional and behavioral needs resulting from the pandemic, requiring additional supports. If greater supports are needed, will that come from the DOE or DYCD? If the DOE, which office therein?
- Will Summer Rising sites all be physically accessible? If not, what support and assistance is being afforded families with accessibility needs for summer programming?
- Will there be assigned spaces at Summer Rising programs for students to receive special education-related therapies?
- Are any of the CBOs in the same locations as District 75 programs?

Recommendations:

Regardless of the answers to our questions above, and with the interests of NYC's students with disabilities in mind, we make the following recommendations:

1. The DOE must provide alternative transportation options for students who require busing home at the end of the day in order to attend a Summer Rising program in the afternoon. That could include using reimbursement, pre-imburement, Access-a-Ride, or making plans to use a rideshare app like Uber or Lyft. This is not a one-size-fits all problem, and no one solution will suffice. Therefore, the City will need to offer an array of options for travel and supports during that travel, including for families who are not able to lay out money and await reimbursement.
2. The City should develop District 75-specific enrichment programs in each borough with the expertise required to meet the needs of their students and those currently in non-public schools. Those programs should be located so students can travel between their morning and afternoon programs quickly enough to benefit from afternoon enrichment hours. In the alternative, the City could offer a few afternoon programs in District 75 buildings in each borough and open those sites to all families, encouraging those with children from District 1-32 schools to attend as well.
3. The DOE should issue clear guidance that all supports (including paraprofessionals, behavioral interventions and supports, medication administration and other health-related assistance – nursing or paraprofessional) on a student's IEP/504 plan must be mirrored, not approximated, for their summer programming. Students with medical needs cannot be excluded or segregated from Summer Rising opportunities because their needs are not familiar to CBOs.
4. The DOE should publicly share more information about their planned training for CBO staff around disability supports.

We are, as always, available to discuss any of our questions and concerns in greater detail.

Thank you for your attention to the above.

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