



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BRAD LANDER

November 17, 2023

Chancellor David C. Banks
New York City Department of Education
52 Chambers Street
New York, NY 10007

Re: Rollout of new FSF weight for Students in Temporary Housing

Dear Chancellor Banks,

I hope you and your team at New York City Public Schools are well in these challenging times. I want to start by recognizing DOE's pivotal role in crafting and funding the new Fair Student Funding (FSF) weight for students in temporary housing (STH)—something long recommended by advocates as well as the FSF Taskforce you convened in 2022.

It has come to my attention, however, that unlike other FSF weights, the DOE is choosing to base the new weight allocation for students experiencing homelessness on enrollment as of December 31, 2022. If this decision stands, schools will not receive funding this school year for changes in STH enrollment that have occurred since then.

This is extremely concerning given the thousands of newcomer students that have arrived in NYC since December of last year – and who will likely continue to arrive in coming months. Many of these students will be enrolled in a relatively small number of schools near the shelters where they are living, and those schools urgently need the additional resources that were expected to come from the STH weight to meet the needs of new arrivals while continuing to provide excellent educational services to all their students.

My office estimates that approximately 21,000 students in temporary housing have enrolled in NYC schools since December 31, 2022, using recent numbers cited by DOE. The aggregate funding for the STH weight associated with these students would be \$10.7 million—that is nearly \$11 million in funding that DOE is choosing to deny to schools serving these students.

The DOE implements other FSF weights – those for students learning English, students with disabilities, and the new concentration of needs weight – via mid-year adjustments, and is even using December 30, 2023 as the cutoff for the English language learner and special education weights. So what is the educational policy reason for DOE uniquely denying funding to schools with new students in temporary housing? Without other explanation, it appears that you are purposely creating resource scarcity in schools with new arrivals.

I strongly urge you to reverse this decision by December 15th, in time to apply the new weight designed to provide resources for students experiencing homelessness via the mid-year adjustment, just as you

are doing for other FSF weights. Incorporating a mid-year adjustment for the STH weight would help DOE manage school budgets during this period of dynamic enrollment as newcomer students arrive in the City and then potentially transfer schools (especially now given the new 60-day family shelter rule). I urge DOE to adjust this policy prior to December 15th to allow a mid-year adjustment for the STH weight in January and most importantly, to ensure that schools have the resources needed to serve our students currently experiencing homelessness, along with all their other students.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Lander". The signature is fluid and cursive, with the first name "Brad" being more prominent than the last name "Lander".

Brad Lander
New York City Comptroller