

Public Comment Analysis

Date: April 19, 2016

Topic: Formulas and Method Used to Allocate Revenue among Community School Districts and Schools

Date of PEP Vote: April 20, 2016

Summary of Proposed Item

Pursuant to Education Law section 2590-r and Chancellor's Regulation B-801, the Chancellor must develop objective formulas for use in allocating tax levy funds among community school districts and schools. The Department of Education ("DOE" or "the Department") has developed formulas setting forth the baseline and special categorical weighted Fair Student Funding multipliers (the "FSF Formula Weights" or "formulas") to allocate tax levy dollars to schools.

On March 4, 2016, the DOE proposed maintaining the formula weights used in the 2015-2016 school year and adding new formula weights to the Fair Student Funding ("FSF") formula for English Language Learners ("ELLs"). These new formula weights are needed to implement requirements in recently amended New York State Commissioner's Regulation Part 154, Services for Pupils with Limited English Proficiency ("Part 154"). The DOE is proposing adding the following formula weights:

- Establish new ELL bilingual weights to support students in mandated bilingual programs.
- Establish new proficient/commanding weights for former ELLs now mandated for English as a New Language ("ENL") services for 2 years.
- Establish a new weight for Students with Interrupted Formal Education (SIFE), in order to provide additional supports for these students. ELLs with SIFE status will receive their respective ELL weight, in addition to the new SIFE weight.

Summary of Issues Raised and Significant Alternatives Suggested

The public comments received since the DOE posted the FSF Formula Weights are summarized as follows:

Comments Related to the FSF Weights:

- One comment asked where information on funding for dual language programs can be found, and how the new weights will enhance that funding.

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- Another comment inquired about the base per capita for a K-5 student in the 2016-2017 school year.
- One comment asked about how the grade and need-based weights are applied.
- There was a request for a non-technical summary of how the DOE determines various weights.
- An additional comment inquired if the proposed funding was sufficient to adequately meet the needs of ELL and SIFE students.
- Another comment questioned the percent of FSF funding in FY 2008, the first year the FSF funding method was put in place.
- One other comment expressed a lack of clarity on how FSF levels and adjustments are calculated.

Comments Related to the FSF Percent:

- A comment inquired about the validity of the Fair Student Funding percent as a means of measuring funding disparity amongst schools.

General Comments:

- One comment requested opportunities for parent and community involvement in the decision-making process for school-based funding allocations.

Additional comments were received that were unrelated to the budget allocation formulas.

Analysis of Issues Raised and Significant Alternatives Proposed

Comments Related to the FSF Weights:

With respect to first comment regarding the location of information on funding for dual language programs, the DOE annually publishes information on school allocations in the School Allocation Memorandums (“SAMs”). SAMs for each fiscal year are available on the DOE website, and can be found via the following link:

<http://schools.nyc.gov/Offices/DBOR/AM/default.htm>

SAMs for the 2016-2017 school year will be disseminated beginning in late May or early June. The new weights will result in increased funding for these programs. The Fair Student Funding formula allocates funding for students in dual language programs via the grade weight, and for ELLs in dual language programs via the applicable ELL weight. Under the proposed changes to the formula, ELLs in dual language programs would receive the proposed bilingual program

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weight in addition to their grade weight, while former ELLs who have achieved proficiency within the past two years would receive the commanding weight, in addition to their grade weight.

With respect to the second inquiry regarding the 2016-2017 grade-weight per capita for students in grades K-5, that information is not yet available. The K-5 grade weight per capita for the 2015-2016 school year is \$4,104. The 2016-2017 school year per capita amount will be publicly available on the DOE website at the time of the initial allocations in late May or early June.

With respect to the third comment each student is entitled to the grade weight specific to his or her grade level, and applicable needs weights are added to each student's grade weight. Specifically, the aggregated weight for a student in grades 6-8 who has met the well-below standards needs weight requirement will be 1.58.

1.08 (Grade 6-8 weight) + 0.50 (well-below standards needs weight) = 1.58 .

Additionally, the aggregated weight for a student in grades 6-8 with a need for Integrated Co-Teaching (ICT) services and who has met the well-below standards needs weight requirement would be calculated as 3.32.

1.08 (Grade 6-8 weight) + 0.50 (well-below standards needs weight) + 1.74 ($\geq 60\%$ ICT 6-8 weight) = 3.32

With respect to the fourth inquiry regarding a non-technical summary of how the various weights are determined, the weights were developed to cover the cost of the teachers required to provide the instructional service, the prep period coverage needed for each teacher and substitute teachers to cover absence, and with additional funding for support services and instructional materials.

The fifth comment asked if the proposed funding was sufficient to adequately meet the needs of ELL and SIFE students. The proposed changes were developed based on student program models staffing and instructional material needs, in consultation with the Division of English Language Learners.

The sixth comment regarding the FSF funding percent in FY 2008 stating that funding was originally allocated at 100% on the average to all schools is incorrect. Since the inception of FSF, all schools have had varying funding percentages; at no time since then have schools been funded at 100% on the average. The DOE has yet to receive \$2 billion dollars it is due from New York State under the Campaign for Fiscal Equity ("CFE") settlement. As a result, the DOE is unable to bring all schools to 100% FSF.

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The seventh comment asked for additional clarity on how FSF levels and adjustments are calculated. The DOE posts detailed calculation information about each school's FSF percent and allocation calculation on school-specific web pages, which can be downloaded into spreadsheets for analysis. Details of each school's FSF allocation can be found at:

- FSF Overview: <http://schools.nyc.gov/AboutUs/funding/schoolbudgets/default.htm>
- FSF Details: <http://schools.nyc.gov/AboutUs/funding/FSFDetail/default.htm>
- School Allocation Memoranda web page, with detailed guidance about FSF allocation methodology, as well as district allocation summaries: http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy15_16/AM_FY16_pg1.html

Comments Related to the FSF Percent:

The DOE has yet to receive 2 billion dollars it is due from New York State under the Campaign for Fiscal Equity ("CFE") settlement. As a result, the DOE is unable to bring all schools to 100% FSF. The DOE is addressing this situation on an ongoing basis by providing additional funding to the lowest funded schools to equalize the funding percentage over time. The DOE remains committed to increasing the funding percentage for under-formula schools, as revenue permits.

General Comments

The Panel for Educational Policy will be taking public comments on this item at its April 20th meeting. In addition, this public comment process has provided an opportunity for superintendents, Community Education Councils ("CECs") parents and other community members to submit comments on funding allocations.

Proposed Budget Allocation Formula

The proposed budget allocation formulas that were posted on the DOE website on March 4, 2014 will be presented to the Panel for Educational Policy on April 20, 2016.

The proposed allocation formulas are available at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/BudgetAllocationApril202016PEP>