

LESSONS FROM NEW YORK CITY'S UNIVERSAL PRE-K EXPANSION

How a focus on diversity could make it even better

Halley Potter | May 13, 2015



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Over the past decade, the push for high-quality early childhood education has gained momentum. The benefits of quality early learning experiences—known from many years of social science research on the benefits of high-quality preschool—have recently been backed up by new discoveries in the field of neuroscience. And with early childhood initiatives attracting bipartisan support at the state and federal level, state pre-K programs have roughly doubled in funding and enrollment over the past ten years.¹

But while more American children are enrolled in preschool now than ever before, the country has a long way to go in expanding access to and improving the quality of early childhood programs.² Only 41 percent of four-year-olds nationwide are enrolled in publicly funded preschool programs.³ And across all forms of preschool, most children attend programs of only moderate quality, with low-income and African American children most likely to be in poor-quality programs.⁴

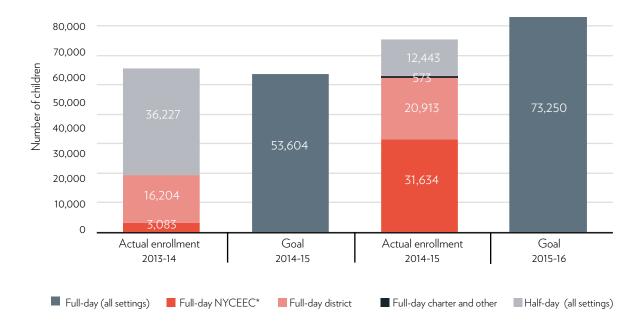
The federal government has made some new early childhood investments in recent years through the Preschool Development Grants and Early Learning Challenge Grants, but it is state and local governments that have emerged as the real leaders in expanding public funding for early childhood education. The most recent high-profile example comes from New York City.

In 2013, Bill de Blasio campaigned for mayor of New York City on the promise of ending the "tale of two cities," bridging divides between haves and have-nots.⁵ A central policy proposal of his platform for fighting economic and racial injustice was making high-quality, full-day pre-K available free of charge to all of the city's four-year olds by expanding New York's Universal Prekindergarten Program (UPK).*

Note that while universal pre-K is not a concept unique to New York, the acronym UPK will be used in this brief to refer specifically to New York State's Universal Prekindergarten Program.

This brief can be found online at: http://tcf.org/bookstore/detail/lessons-from-new-york-citys-universal-pre-k-expansion

FIGURE 1 UPK ENROLLMENT GOALS AND ACTUAL ENROLLMENT, BY TYPE OF SEAT AND PROVIDER



* New York City Early Education Centers (NYCEECs) are UPK sites run by community-based organizations

** "Other" UPK programs are those that are authorized directly by the state rather than by the New York City Department of Education. These programs enrolled 379 children in 2014-15. Source: Data for enrollment goals is from Office of the Mayor, Office of Management and Budget, Department of Education, Administration for Children's Services, Ready to Launch: New York City's Implementation Plan for Free, High-Quality, Full-Day Universal Pre-Kindergarten, January 2014, http://www1.nyc.gov/assets/home/downloads/pdf/reports/2014/Ready-to-Launch-NYCs-Implementation-Plan-for-Free-High-Quality-Full-Day-Universal-Pre-Kindergarten.pdf; data for actual enrollment come from the New York City Department of Education.

Now just over a year into his term as mayor, de Blasio's administration has launched the pre-K expansion with remarkable speed. The administration nearly tripled the number of children in full-day pre-K programs from fall 2013 to fall 2014, and is on track to meet the full expansion goal of serving more than 70,000 children total in full-day pre-K programs by fall 2015—enrolling roughly the same number of children in pre-K as in public kindergarten (see Figure 1). Only four other states—Florida, Georgia, Texas, and California—currently serve more than 70,000 four-year-olds in state pre-K programs (both full-day and half-day programs), and only Georgia has as many children in full-day pre-K programs as well as strong ratings on program quality.⁶

The nation's eyes are therefore on New York City's experiment in early childhood education as a test case

for expanding universal pre-K to more states and cities across the country. As public and political support for early childhood programs has grown, states and cities are poised to make new investments in early education but need roadmaps to guide that work—can New York City's UPK be a model for pre-K expansion?

By taking a closer look at New York City, and, in particular, observing what has worked and what has not, we can derive lessons for the rest of the country about how to implement high-quality universal pre-K. Can pre-K programs be expanded rapidly, and if so, what are the key criteria for doing so successfully? Which policies are needed to support high-quality learning environments in every classroom? How can policymakers ensure that families of all backgrounds benefit from universal pre-K? Finally, a question that is too rarely on the list: Which supports are needed to increase opportunities for creating diverse universal pre-K classrooms?

This brief is divided into two parts. The first provides background on how universal pre-K programs fit into the national landscape of early childhood policy, outlines the main features of New York City's current UPK expansion efforts, and draws lessons for other cities and states interested in expanding their programs. The second part provides an in-depth look at the issue of preschool classroom diversity in UPK, highlighting the opportunities and obstacles for integration embedded in current policies and recommending policy changes to address this issue in New York City and beyond.

PART ONE

Policy Lessons from New York City's Universal Pre-K Expansion

Universal Pre-K and the National Early Childhood Policy Landscape

Colloquially, the terms preschool, pre-K, day care, and nursery school are often used interchangeably, but in the world of early childhood policy, universal pre-K has a specific meaning. Universal pre-K programs are state-funded preschool programs that offer early childhood education to all gualified children during the year or years before kindergarten. Universal means that a program's only eligibility criteria are age and residence-no requirements based on income, disability, or other risk factors-and that, ideally, there should be enough seats for all interested families to enroll. (In practice, however, most programs intended to be universal pre-K fail to provide universal access, despite universal eligibility, because there are not enough seats available.) In contrast with some other early childhood models that stress a broader set of goals including family engagement, health, or parent education—such as the federal Head Start program pre-K focuses primarily on preparing children for school.7

There is widespread agreement among researchers and policymakers that funding high-quality early childhood education is among the most powerful public investments we can make, with strong programs targeting disadvantaged students providing over \$8 in return for every \$1 spent.⁸ However, political interest in universal early childhood programs—those that are accessible to families of all backgrounds—is a relatively new phenomenon.

A Historical Focus on Low-income Children

Until recently, most social science research on early education was primarily concerned with the benefits to low-income students. As a result, the studies that were cited most often regarding the benefits of quality early learning were ones that examined programs that served disadvantaged families.⁹

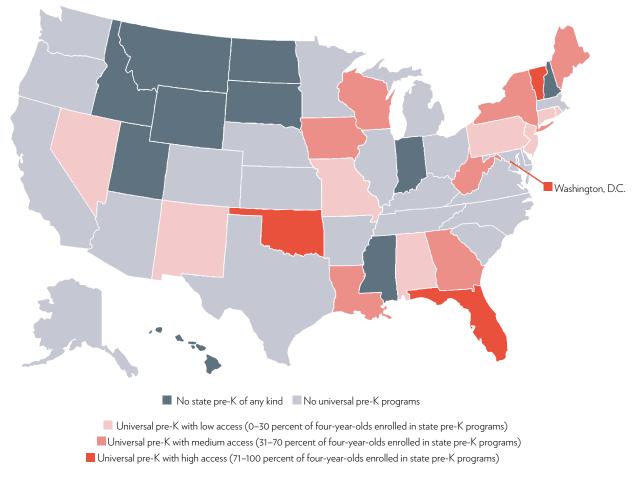
Likewise, public investments in early childhood education have historically focused on providing more access for low-income children, based on the argument that these students have the most to gain from preschool and are least likely to have access to early childhood education otherwise. Head Start, the oldest and largest federally funded preschool program in the United States, primarily serves economically disadvantaged students. Just 8.5 percent of children in Head Start nationwide come from families earning above the federal poverty level.¹⁰ Moreover, only eighteen states and the District of Columbia have a public pre-K program without income or other risk factor eligibility requirements, and only four of these-Washington, D.C., Florida, Oklahoma, and Vermontenroll more than 70 percent of the state's four-yearolds in public pre-K (see Figure 2).¹¹

The Benefits of Preschool for Middle-Class Children

In recent years, the research base in support of universal access to early childhood education has grown. New findings regarding middle-class students suggest that attending high-quality preschool makes a difference

The Century Foundation | tcf.org

FIGURE 2 ACCESS TO STATE UNIVERSAL PRE-K PROGRAMS, 2014



Universal pre-K programs here include all state pre-K programs with universal eligibility, for which age and residence are the only eligibility requirements. As this map shows, many of these programs fall far short of providing universal access.

Source: W. Steven Barnett, Megan E. Carolan, James H. Squires, Kirsty Clarke Brown, Michelle Horowitz, The State of Preschool 2014 (New Brunswick, N.J.: National Institute for Early Education Research, 2015), 13, 178.

in their educational and economic success as well. Research on children enrolled in pre-K programs in Tulsa, Oklahoma, for example, found that while poor students benefited most from such programs, entering kindergarten 11 months ahead of their nonparticipating peers in pre-reading skills, higher-income children also showed impressive gains, entering kindergarten 7 months ahead of their peers.¹² Likewise, research on children in Boston pre-K programs found that low-income and middle-class students alike showed large gains in literacy and math skills as a result of the program, while low-income students also showed gains in social-emotional skills related to self-regulation and attention.¹³ In his recent book, *From Preschool to Prosperity*, economist Tim Bartik of the Upjohn Institute calculates substantial lifetime earnings gains from quality pre-K programs for middle-class children that are nearly as large as those for low-income children.¹⁴

Data on access to early childhood education also suggests that many middle-income families currently lack access to affordable, high-quality preschool. Nationally and in New York City, middle-income families lag behind more-affluent families in access to early childhood education. Nationwide, just 64 percent of four-year-olds from families making \$50,000-\$60,000 per year attend preschool-roughly on par with attendance among four-year-olds from impoverished families making less than \$10,000 per year (62 percent). By contrast, 89 percent of fouryear-olds from families making more than \$100,000 per year attend preschool.¹⁵ In New York City, the number of licensed preschool slots (including all public and private providers) per 100 children is lowest in zip codes that fall in the middle quintile based on family income-just 24 slots per 100 children on average in these zip codes—compared to 30 slots per 100 children in the poorest quintile of zip codes and 41 slots per 100 children in the wealthiest quintile of zip codes.¹⁶

Middle-class families who are ineligible for meanstested preschool programs may at the same time be priced out of the private market. With an average annual preschool cost of \$12,280, New York was ranked the least affordable state for center-based care for a four-year-old by the research and advocacy group Child Care Aware.¹⁷

The Link between Preschool Classroom Diversity and Program Quality

Beyond increasing the pool of children who would benefit, universal pre-K offers the potential to bring children of different socioeconomic backgrounds together in the same classrooms. This is an important feature, because recent research suggests that the socioeconomic and racial diversity of preschool classrooms is a key component of their educational quality.

Decades of research on K–12 education have shown that low-income students see gains to their reading and math skills from learning in socioeconomically integrated environments as opposed to attending schools with high concentrations of poverty.¹⁸ Racially integrated classrooms also help foster critical thinking skills and reduce racial biases, important traits in today's complex, multicultural world.¹⁹

Adding to the large body of work on children in K-12, new research finds similar cognitive and social benefits in diverse preschool classrooms. A 2015 report from The Century Foundation and the Poverty & Race Research Action Council highlights these findings.²⁰ One study using a large dataset of children from eleven state pre-K programs found that preschool children in classes with higher average socioeconomic status (SES) learned more on average than those in low-SES classroomsregardless of the children's own backgrounds.²¹ Another study comparing preschool children in economically mixed classrooms versus high-poverty classrooms found that those in the economically mixed preschools showed greater growth in language skills.²² In addition, racially and socioeconomically diverse preschool classrooms may help reduce prejudice. Research shows that children typically develop awareness of racial and social categories by kindergarten, and that exposure to peers helps shape these perceptions.²³ One study of Anglo-British preschool children, for example, found that those children in racially integrated classrooms were less likely than those in homogenous classrooms to show racial bias toward minorities.²⁴

Political Support for Universal Pre-K

As the research base for universal pre-K has expanded, political interest in such programs has also gained momentum. While the hefty price tag of universal pre-K can be a political liability, universal access can also be a political asset. More families stand to benefit from universal, as opposed to targeted, public preschool—including middle-class and affluent families with political and social capital. Seven-in-ten Americans favor federal funding for universal preschool programs.²⁵ Universal pre-K programs have attracted broad bipartisan support. The two states most lauded for their universal pre-K programs—Georgia and Oklahoma are "red states" that have relied on the support of Republicans and Democrats alike to create and sustain their programs.

Thus, when de Blasio campaigned in 2013 on a platform of pre-K for all, the timing was right.

Overview of Universal Pre-K in New York City

In January 2014, the de Blasio administration released an implementation plan for dramatically expanding New York City's existing pre-K program—which was "universal" by name, but not in terms of access. The goal of the plan was simple but ambitious: "to implement a truly universal pre-kindergarten system in New York City that provides every 4-year-old with high-quality, full-day pre-K."²⁶

New York City has had "universal pre-K" classrooms for which all four-year-olds in New York City are eligible—since 1998, as part of the statewide UPK program that began that year; however, up until now, the program has served only a small slice of the eligible population. The New York State legislature voted in 1997 to make universal pre-K available to all four-yearolds in the state by 2002–03, but the proposal lacked sufficient funding, and by the target year, just one-infour four-year-olds across the state was enrolled.²⁷

Furthermore, when de Blasio took office, most UPK programs across the state were half-day, offering just two-and-a-half hours of instruction.²⁸ Under Mayor Michael Bloomberg, New York City expanded its UPK program, focusing on creating seats in low-income, high-needs neighborhoods.²⁹ However, as of 2013, UPK still served just 19,483 children in full-day pre-K programs—approximately 18 percent of all four-yearolds in New York City—and an additional 39,045 children, or 37 percent of the population, in part-day programs.³⁰ Research shows that low-income students in particular show greater learning gains, on average, in full-day as opposed to half-day preschool.³¹ Thus, the de Blasio administration pledged to add new full-day pre-K seats and convert existing half-day seats to full-day.

UPK is just one component of the early education policy landscape in New York City. Other publicly funded preschool programs in the city include federally funded Head Start classrooms and EarlyLearn centers operated by community-based organizations (CBOs) and funded by the city's Administration for Children's Services (ACS). In addition, ACS issues child care vouchers to eligible families for use at any licensed provider in the city, including both preschools and child care centers without an educational focus. Furthermore, many families also send their children to nonprofit or for-profit private-pay preschools.

But the universal nature of UPK sets it apart from the other early education delivery streams in the city. It is the only program that offers public preschool to all families, free of charge, without additional eligibility requirements. The administration has touted two key benefits of universal access: promoting classroom diversity, and easing the economic burden of preschool on middle-class families. Deputy Mayor Richard Buery explained in an interview with a local television station,

> We all know of course that prekindergarten programs have a great impact on the wellbeing of young people in low-income neighborhoods. They achieve extraordinary gains when they're in quality programs. But you also can't discount the value of those young people being in diverse classrooms, with people of a variety of income levels.

Also, anybody in New York City knows that being middle-class, being above the median income here, doesn't mean that it's easy to pay the bills. And you can't discount what it means for middle-class families to be able to have what might otherwise be a \$10,000 or more expense be covered by the public.

So we actually think just like public fifth grade makes sense for everybody, just like we don't have income limits on who can go to public high school, we don't think it makes any more sense to have income limits on who can go to prekindergarten. We're proud that we're bringing these opportunities to every young person in New York City.³²

UPK is also set apart from other early education models in the city for its focus on school preparation and alignment with the K–12 curriculum. UPK programs follow the New York State Prekindergarten Foundation for the Common Core, a preschool learning framework that aligns with the state K–12 Common Core standards.³³

UPK expansion was the administration's first big policy initiative, delivering on a promise that had been a key part of the mayor's election campaign and his commitment to fight economic inequality. The administration released its plan in January 2014, and funding came through in April. By September, over 50,000 children were enrolled in full-day pre-K classrooms—an increase of more than 30,000 over fullday pre-K enrollment the previous fall.

How did the city expand UPK so rapidly? Below is an overview of the basic elements of the UPK expansion: funding, delivery, family recruitment, enrollment, and evaluation.

Funding

In the plan laid out by the administration, New York City's UPK expansion was expected to require an average of \$10,239 per child, or \$340 million annually. This was an increase of 42 percent over previous average per-child UPK city spending, and reflects added costs for enhancing infrastructure to support the expansion and for improving the quality of the program by providing additional classroom education materials and increasing the number of Department of Education and Department of Health and Mental Hygiene staff available to review applications and conduct site visits.³⁴

Securing this funding was one of the first political battles for Mayor de Blasio. During his campaign, de Blasio had proposed funding UPK via a dedicated tax on the wealthiest New Yorkers, increasing the tax rate on income in excess of \$500,000 a year from 3.9 percent to 4.4 percent.³⁵ A multi-million-dollar privately funded awareness campaign raised public support for "Pre-K for All," and according to one poll, 68 percent of New Yorkers approved of implementing such a tax.³⁶ However, the New York State legislature had to sign off on an income tax increase, and Governor Andrew Cuomo took a hard line against raising taxes.³⁷ Thousands of supporters rallied for pre-K in March 2014, and at the end of that month, a compromise was struck to include funding in the state budget—\$1.5 billion for pre-K expansion across the state over five vears, with a first installment of \$300 million to New York City in 2014.³⁸

Delivery

In order to serve more than 70,000 children in UPK classrooms, New York City is relying on multiple service providers, locating sites throughout the five boroughs, and investing in teacher recruitment and training. UPK programs are now offered in a mix of district schools, charter schools, and community-based

organizations (see Figure 1). Prior to UPK expansion, a majority of NYC's full-day pre-K seats were in district schools, while a smaller portion were located in community-based organizations contracted by the Department of Education. In order to expand the number of full-day seats available, the city has added new slots in district schools, enlisted roughly a dozen charter schools to provide pre-K for the first time, and dramatically increased the number of seats available in community-based organizations.³⁹ These communitybased organizations include private nonprofit and for-profit preschools and child care centers as well as multi-service community organizations that offer additional services for children, families, and adults. Some are longtime contractors with the Department of Education, ACS, and federal Head Start, while others have no previous experience with government contracting.

Finding qualified teachers for the growing number of UPK classrooms has posed a challenge. To help recruit and train roughly two thousand new lead pre-K teachers by 2015, the Department of Education has placed ads in the New York City subway system publicizing the positions and held recruitment events. Through a \$6.7 million partnership between the Department of Education and the City University of New York's Early Childhood Professional Development Institute, the city is working to help four hundred new teachers earn their certification.⁴⁰

Furthermore, the Department of Education has taken important first steps toward reducing the pay gap between teachers with identical certification and experience in CBO versus public school sites. Prior to UPK expansion, certified teachers in CBO sites earned an average salary of \$36,000–\$40,000 per year, compared to a starting salary of \$45,000–\$51,000 for pre-K teachers in district schools. This difference in pay is due in part to the fact that pre-K teachers in district schools are represented by the district's teacher union, the United Federation of Teachers, whereas pre-K teachers in CBO sites either lack union representation or belong to local chapters of District Council 1707, which represents child care and home care workers in New York City and is affiliated with the American Federation of State, County, and Municipal Employees (AFSCME).⁴¹ However, the Department of Education has provided funding for CBOs to raise salaries to \$44,000 per year for certified teachers with bachelor's degrees and \$50,000 for certified teachers with master's degrees.⁴²

In addition to helping recruit and better compensate teachers, the Department of Education has also made new investments in professional development and support for pre-K teachers. Through a partnership with Bank Street College of Education, the Department of Education hosted multiple teacher training institutes during the summer and school year, serving roughly four thousand pre-K teachers and staff.⁴³ The administration has also set out to more than double the number of instructional coaches employed by the Department of Education to provide professional development and on-site support for pre-K providers and to reduce the classroom caseload for each coach.⁴⁴

Family Recruitment

Eligibility for UPK is simple: any family residing in New York City with a child who will turn four years old that calendar year is eligible for UPK in the fall.⁴⁵ Reaching and enrolling eligible families, however, is more complicated. In order to fill tens of thousands of new seats in UPK, the Department of Education needed to inform parents of the new pre-K options and create an application system to streamline the process. Starting in spring 2014, the Mayor's Office of Community Affairs and the Department of Education launched an aggressive and unprecedented grassroots campaign to recruit and enroll families, building on initial outreach efforts begun in previous years.⁴⁶ As part of the campaign, the Department of Education hired a team of several dozen dedicated pre-K enrollment specialists, often tapping people with experience in political organizing or personal ties to different communities across New York. The outreach team called families and canvassed local businesses and child care sites to spread the word about UPK and answer families' questions. In the first two years of UPK expansion, outreach specialists have made hundreds of thousands of phone calls to families of four-year-olds to share information about the program and the benefits of pre-K, or to provide families with direct assistance completing the application process.

In addition, the Department of Education has held information sessions and fairs across all five boroughs and partnered with a wide variety of community organizations and city agencies. The department launched paid media campaigns in subways, bus stations, and print outlets, in both English and Spanish. And the Department of Education created a new text message hotline to allow families to access information about pre-K sites near them from their phones.

One of the recruitment challenges was getting families to apply to the UPK sites run by CBOs. Traditionally, UPK programs in district schools have tended to be more popular and well-known than programs in CBOs. Parents were likely more familiar with pre-K programs in public schools and tended to perceive them as being of higher quality, while CBOs might be less familiar and less trusted. But in 2014, only 62 percent of families that applied to UPK programs in district schools received slots, so there was a need to increase the appeal of nondistrict programs.⁴⁷ Under the new UPK expansion, the Department of Education has dubbed the communitybased UPK sites New York City Early Education Centers (NYCEECs), as part of an effort to rebrand them, increase their visibility, and emphasize their educational guality.48 While some NYCEECs conduct their own recruitment, the Department of Education has also helped to make sure that those families in districts where public schools had no pre-K slots available were aware of the full range of pre-K options and had information about NYCEECs in the area.

Along with its efforts to recruit large numbers of new families to UPK, the Department of Education has also worked to streamline the application process for families. During the first year of UPK expansion, the application process was fragmented, largely operating under the old system. Families had to apply to district, charter, and NYCEEC pre-K programs separately, and while district and charter school programs had enrollment deadlines and admissions lotteries, most NYCEECs admitted students on a first-come, firstserved basis.⁴⁹ However, for 2015, the Department of Education created a new application system that allows families to apply to district and NYCEEC programs through a single process, ranking up to twelve different programs.⁵⁰ Applications now must be submitted by a certain deadline, and families are assigned to programs afterwards, based on their program selections and a random lottery with a set order of preferences for families based on factors such as geography, siblings, and previous enrollment. Not only does the streamlined application process make it easier for families to apply to multiple programs, but it allows the Department of Education to better balance enrollment across different sites.

Enrollment

In 2013–14, the school year before UPK expansion, UPK served roughly 19,000 children in full-day programs and 36,000 children in part-day programs. Under the expansion plan, the de Blasio administration set goals of increasing the number of children in fullday UPK to more than 50,000 in fall 2014 and reaching full expansion in fall 2015 by providing full-day seats for more than 70,000 four-year-olds, estimated to be the number of four-year-olds in need of UPK.⁵¹ The administration met its goal for fall 2014 and is on track to reach the full expansion goal in fall 2015 (see Figure 1).

There is some question, however, about the administration's estimate of the number of children needing UPK. According to U.S. Census Bureau estimates, there are roughly 115,000 four-year-olds in New York City.⁵² The exact UPK enrollment target provided by the administration's UPK implementation plan, 73,250 four-year olds in 2015–16, was derived by looking at the number of children in public (district and charter) kindergarten, subtracting the number of students with individualized education plans (IEPs) that require specialized preschool settings. The estimate does not include children in private or parochial kindergartens, those who are homeschooled or otherwise do not attend kindergarten, and, according to researchers at the University of California at Berkeley, it also undercounts the number of kindergartners who will be attending charter schools.53

In assuming a direct correspondence between UPK demand and public kindergarten demand, the administration's target enrollment may not account for families planning on private or parochial programs or homeschooling who nonetheless desire to enroll in UPK. Indeed, a number of UPK programs are located in private and parochial schools, and it is reasonable to assume that some of the families selecting these programs intend to keep their children at those schools for kindergarten. In failing to account for these scenarios, the administration's current target may fall short of actual need. Furthermore, the families that are left unserved by UPK may not be just those selecting private options but also may include families planning on public kindergarten and who would stand to benefit from UPK access. In response to this criticism, the Department of Education has said that the administration will work to increase the number of available UPK seats if demand exceeds original perceptions, beginning already with increasing the number of available seats in fall 2015 to 75,000–1,750 seats more than the original target.⁵⁴

Questions also remain about the diversity of pre-K enrollment. The demographic information available on the children enrolled in UPK is currently limited, since, in an effort to keep the enrollment process simple for families, the Department of Education collects minimal demographic data from pre-K families. Upon enrollment, all families at NYCEECs and public school sites fill out a form that includes information about ethnicity, gender, home language, and address of residence. Pre-K students in public schools also fill out forms for the federal free and reduced-price lunch program, which is determined based on family income. This data provides a consistent picture of the race/ ethnicity of children enrolled in UPK across all settings, revealing that UPK enrollment closely mirrors public pre-K enrollment in terms of race/ethnicity.

Economic data, however, is incomplete. Families in NYCEECs do not answer any questions about family income, and the Department of Education has yet to break out district and charter school federal free and reduced-price lunch data for pre-K, as it has done for other grades. Faced with this lack of economic enrollment data, some researchers have turned to program location as a proxy for enrollment. Researchers Bruce Fuller and Elise Castillo, who are skeptical of the universal pre-K approach, have criticized the administration for doing too little to address the disproportionate lack of access to preschool in the city's poorer neighborhoods by locating too many new seats in wealthier neighborhoods.⁵⁵ Their analysis relies on questionable data comparisons that contrast UPK enrollment with access to child care in centers run by CBOs for children ages two to five-hardly an applesto-apples comparison with UPK's model based on public school and CBO sites, for four-year-olds only. Furthermore, the Department of Education's analysis of program locations shows that UPK offers a greater proportion of seats in the poorest neighborhoods than does public kindergarten. However, without demographic data on children enrolled in UPK, it is difficult to address these issues of access and diversity head-on.

Furthermore, across all of these data sources, no information is currently available on classroom-level diversity in UPK—which we know from recent research has important implications for program quality. (See Part 2 of this brief.)

Evaluation

In order to assess the impact of UPK in both the short and long term, the administration has introduced several methods for measuring program quality and tracking child outcomes. Long-term effects of UPK will not be seen for some years to come-when current pre-K students graduate from high school, enroll in college, or enter the workforce, for example. In the meantime, the Department of Education is collecting data that can be used from one year to the next to help inform and improve UPK classrooms. For example, teachers are collecting observation data on their students in alignment with the state pre-K standards. Instructional coaches are observing classroom interactions, examining lesson plans and student work, and evaluating classrooms using the nationally recognized Classroom Assessment Scoring System (CLASS). Beginning in 2014–15, pre-K parents and teachers at both public schools and NYCEECs are providing feedback on the pre-K learning environments by participating in the NYC School Survey, which has been administered to all public school parents and teachers across all grade levels, as well as students in grades 6–12, since 2007.

Moreover, the Department of Education has signed a \$2 million contract with two outside firms, Westat and Metis Associates, to evaluate UPK by studying a representative sample of two hundred pre-K sites. Researchers are assessing children on early math and verbal skills as well as social-emotional skills such as selfregulation. In addition, they are interviewing teachers and parents and collecting data on the impact of UPK on families' workforce participation and economic wellbeing.⁵⁶

Early Lessons for Other Cities and States

UPK expansion in New York City is still in its early phase. Many questions about the effectiveness of the policy in expanding access, improving program quality, boosting child outcomes, and reducing economic inequality will not be answered until years down the line. However, even in this early phase, it is possible and valuable to observe what is working and what is not, providing useful information for other states and cities embarking on new investments in early childhood education.

Initial Successes

New York City's UPK expansion is off to a running start. Midway through a two-year plan for expansion, the City is on track to meet enrollment goals. By reaching out to the community and building on existing preschool infrastructure, the Department of Education created or upgraded more than 30,000 full-day pre-K seats in one year. The de Blasio administration has made smart investments in teacher professional development and instructional coaches to build highquality programs. And the Department of Education has laid the groundwork for a robust evaluation of the program to inform pre-K expansion over the next few years and beyond.

> • *Engaging the community.* One of the keys to New York City's success in securing funding for UPK and reaching enrollment targets was active

outreach and grassroots organizing. During the mayoral campaign and the fight for UPK funding at the beginning of de Blasio's term, an extensive media and community organizing campaign funded by a separate nonprofit raised awareness and built public support for UPK.⁵⁷ Once funding for the program came through, the administration continued extensive outreach through media advertisements, phone calls, and on-the-ground canvassing in order to recruit and enroll families.

• Building on existing infrastructure. New York City has been able to scale UPK quickly by making use of existing organizations and facilities whenever possible. Prior to the expansion, most full-day UPK slots were in district schools, but because the space needed to expand pre-K in district schools is limited, the administration has relied heavily on CBOs to provide additional seats and also enlisted some charter schools to offer UPK.

• *Investing in teachers*. As part of UPK expansion, the city has made smart investments in teacher recruitment, certification programs, and professional development. Although disparities between pre-K teacher salaries in district schools versus NYCEECs remain a source of friction, the Department of Education made an important first step toward increasing pay parity across sectors.

• Incorporating evaluation from the start. Data on program quality and student outcomes is necessary to inform and improve pre-K implementation as well as provide evidence of the program's effectiveness in order to obtain future funding. The Department of Education has wisely built data collection and research into UPK expansion from the start, laying the groundwork for both short-term and long-term evaluations.

Areas for Improvement

While UPK expansion is off to a strong start, the program is not without weaknesses. The Department of Education must collect better demographic data on pre-K children in order to examine classroom diversity and access for low-income families. And the administration should take the commitment to diversity seriously by exploring policies that would increase opportunities for creating socioeconomically integrated pre-K classrooms.

• Promoting classroom diversity. In its political rhetoric. the de Blasio administration has embraced the opportunity that UPK provides for creating mixed-income pre-K classrooms. However, there are more steps that the administration could take to maximize opportunities for classroom diversity by funding transportation, revising enrollment priorities, and enabling blended funding models (see Part 2 of this brief). By planning ahead to promote classroom diversity, UPK and other state pre-K programs will be addressing an important aspect of program quality.

• *Monitoring access for low-income children.* The de Blasio administration has attracted criticism for placing too many UPK seats in more-affluent neighborhoods. The administration refutes this charge, but it has nonetheless received much media coverage⁵⁸ In some ways, this debate about enrolling enough low-income students reflects the divide within the early childhood research and advocacy community regarding universal versus targeted preschool programs. But the administration's strong support for

a universal program has been unnecessarily hampered by a lack of demographic data on the children enrolled in UPK. Without this data, even strong supporters of universal preschool may question New York City's approach. The city would do well to collect this information from families and analyze it yearly—both to inform their own recruitment strategies and to communicate better with the public about the families being served—as would other states and cities that opt to follow its lead.

New York City's success so far should demonstrate to other cities and states that large public investments in universal pre-K are politically and logistically possible. It will be important to consider evidence on program quality and child outcomes for UPK as it becomes available. For now, the contrast is stark between the real, rapid growth of free, full-day, UPK enrollment in New York City over the past year and a half and the hollow promise of universal pre-K for all four-year-olds made by the state legislature nearly two decades ago. The nation has a long way to go to expand access to quality early childhood education, but current research and political climates may pose new chances for public investments in preschool that were not available a decade ago. It is up to policymakers to seize these opportunities.

PART TWO How a Focus on Diversity Could Make New York City's Universal Pre-K Even Better

Building on robust research about the benefits of school integration in K–12 settings, recent research on preschool classroom diversity finds that socioeconomically and racially diverse preschool classrooms offer important cognitive and social benefits for children. While most publicly funded preschool programs have primarily served low-income children, universal pre-K programs offer the potential for creating more preschool classrooms that are socioeconomically integrated, and often racially and ethnically integrated as well.

As part of the campaign to make New York City's universal pre-K (UPK) program available to all fouryear-olds in the city, the de Blasio administration has highlighted diverse classrooms as one of the benefits of UPK. But has UPK realized the potential for socioeconomic integration? And how could the program create more opportunities for creating diverse preschool classrooms?

What We Know about Diversity in UPK Classrooms

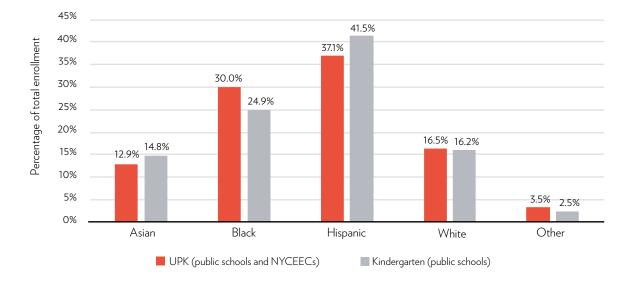
Demographic data on children enrolled in the UPK program and the diversity in its classrooms is spotty, but the information that is available reveals a mix of opportunities and obstacles to diverse UPK classroom enrollment.

There are two main sources of information currently available on racial and socioeconomic enrollment across all UPK programs. First, the Department of Education collects data on race/ethnicity from all families in UPK. Second, program location can serve as a crude proxy for socioeconomic status of enrolled families. However, neither of these analyses provides information about classroom-level diversity. Additional clues about the possibilities for classroom diversity come from looking at data and policies specific to public school UPK sites versus New York City Early Education Centers (NYCEECs), as well as in special programs for English language learners and students with disabilities.

Racial/Ethnic Demographics of Total UPK Enrollment

Based on enrollment forms completed by every pre-K family across NYCEECs and public schools, the Department of Education has a measure of race/

FIGURE 3 RACE/ETHNICITY OF CHILDREN ENROLLED IN UPK VERSUS PUBLIC KINDERGARTEN, 2014–15



Source: New York City Department of Education, data emailed to author.

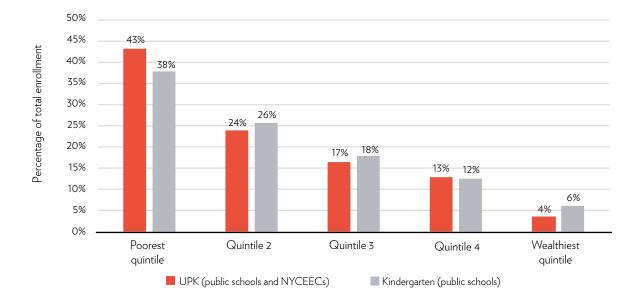
ethnicity for total UPK enrollment (see Figure 3). According to this data, overall pre-K enrollment closely mirrors the racial/ethnic diversity of public kindergarten enrollment. However, because this data has thus far only been provided in aggregate, it does not tell us about racial/ethnic diversity of individual UPK classrooms. Although total enrollment in UPK and kindergarten is quite similar with regard to race and ethnicity, the distribution of students in classrooms could differ dramatically.

Economic Data Based on UPK Program Location

Because pre-K families in NYCEECs do not fill out federal free and reduced-price lunch forms or provide other data on family income—unless they are in a program funded by the Administration for Children's Services (ACS) or Head Start, which has additional eligibility requirements—economic data on total UPK enrollment is not available. Data on the median family income for census tracts in which UPK programs are located provides a rough proxy for economic data on children enrolled in UPK. According to Department of Education analyses of UPK and kindergarten enrollment and program locations, the socioeconomic breakdown of UPK seats by program neighborhood roughly reflects that of public kindergarten seats, with a slightly greater weight toward the poorest neighborhoods (see Figure 4).

This data gives a crude estimate of the overall socioeconomic breakdown of pre-K families; however, the estimate does not account for families that travel outside their neighborhoods to attend UPK, or UPK programs that draw from a particular socioeconomic segment of the population within a certain neighborhood. Furthermore, as with the data on race/

FIGURE 4 STUDENT ENROLLMENT BY AVERAGE FAMILY INCOME OF PROGRAM/SCHOOL NEIGHBORHOOD, UPK VERSUS PUBLIC KINDERGARTEN, 2014–2015



Source: New York City Department of Education calculations based on 2014-15 enrollment and U.S. Census Bureau, 2013 American Community Survey median income five year estimates by census tract.

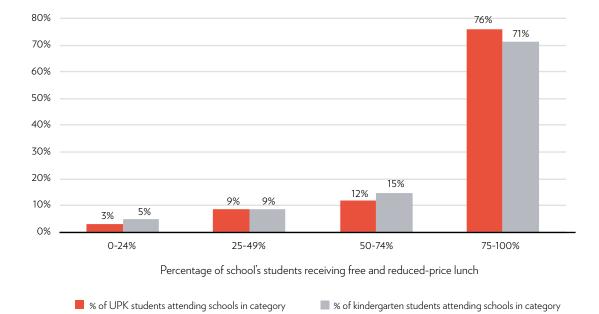
ethnicity, this data does not tell us anything about the socioeconomic diversity of UPK classrooms.

Data on UPK in Public Schools

For UPK programs in district and charter public schools, the Department of Education provides schoolwide demographic data and information on enrollment selectivity. From this, we know that UPK children in public schools are slightly less likely than kindergartners in public schools to attend economically mixed schools in which fewer than three-quarters of the student body are low-income (see Figure 5). Twenty-four percent of UPK children in district or charter schools attend schools in which less than three-quarters of children are eligible for free or reduced-price lunch, compared to 29 percent of children in kindergarten. This may be because the Department of Education has prioritized placing UPK classrooms in high-poverty schools, because economically mixed schools are less likely to have the classroom space needed for UPK, or because higher-income families are more likely to send their children to private preschool programs before enrolling in public kindergarten.

School-wide data is not ideal, however, as it does not tell us the socioeconomic composition of pre-K alone, which may differ from the socioeconomic composition of the school at large. In some elementary schools, for example, the pre-K is more socioeconomically integrated than the school at large because middleclass families send their children to the school for pre-K but choose other options for subsequent grades. Still, this data suggest that the number of socioeconomically integrated UPK classrooms in public schools is limited.

FIGURE 5 UPK AND KINDERGARTEN ENROLLMENT IN NYC DISTRICT AND CHARTER SCHOOLS, BY OVERALL POVERTY LEVEL OF SCHOOL, 2014–15



Source: New York City Department of Education, demographic annual enrollment snapshots, http://schools.nyc.gov/Accountability/data/default.htm

In the directories of UPK programs in each borough provided for parents, the Department of Education also reports the lowest enrollment priority accepted during the prior year's admissions for each district school UPK program. If district school UPK programs receive more applications than available seats, enrollment is determined by a lottery that follows a set of ten admission priorities based on geography, siblings, and availability of pre-K at the applicant's zoned elementary school (see Table 1). In general, preference goes first to students who reside in the attendance zone for the school or who have a sibling at the school, then to students who reside in the district but not attendance zone for the school (with preference given first to families whose zoned elementary schools do not offer pre-K), then to families who reside within the borough, and finally to families residing outside the borough.

The admissions priorities impact classroom diversity because, as a result of residential segregation and gerrymandered attendance boundaries, schools that enroll students outside of the local attendance zone may have more opportunities to achieve socioeconomically and racially diverse enrollments than schools that draw only from the immediately surrounding area, if socioeconomic status is considered in lottery preferences.⁵⁹ Almost half of all district school UPK programs in 2014 admitted only children who live in the attendance zone or have a sibling at the school, leaving little room for using geographic diversity as a pathway to socioeconomic and racial diversity (see Figure 6). In the other 54 percent of district school UPK programs, there could be more opportunities for diversity by coupling enrollment of students from a wider geographic area with smart lottery preferences

TABLE 1 STANDARD ADMISSIONS PRIORITIES FOR DISTRICT SCHOOLS

1. Students residing in the zone, who have a sibling at the school in grades K–5 in September 2015.*

Students residing in the zone, who do not have a sibling at the school.*
Students residing in the district, who have a sibling at the school, and

who have no zoned school or whose zoned school has no pre-K program. 4. Students residing in the district, who have a sibling at the school, and who are zoned to a different school which has a pre-K program.

5. Students residing in the borough, who have a sibling at the school.

6. Students residing out-of-borough, who have a sibling at the school.

7. Students residing in the district, who have no zoned school or whose zoned school has no pre-K program.

8. Students residing in the district, who are zoned to a different school that has a pre-K program.

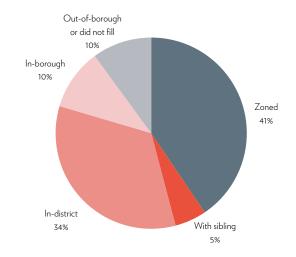
9. Students residing in the borough.

10. Students residing out-of-borough.

* Does not apply to non-zoned schools

Source: 2015 Pre-K for All, directories for each borough, New York City Department of Education, http://schools.nyc.gov/ChoicesEnrollment/PreK/Resources/default.htm.

FIGURE 6 DISTRICT SCHOOL UPK PROGRAMS, BY LOWEST ENROLLMENT PRIORITY ACCEPTED, 2014



Source: 2015 Pre-K for All, directories for each borough (directory updates not included). New York City Department of Education, http://schools.nyc.gov/ChoicesEnrollment/PreK/ Resources/default.htm.

that consider socioeconomic status. However, the current order of enrollment priorities—focusing first on within-district, then within-borough—is not the best plan for encouraging diversity.

Data on NYCEECs

Demographic data on children in NYCEECs, the UPK programs run by community-based organizations (CBOs), is even sparser than data on enrollment in public school UPK programs. The Department of Education does not currently collect information on income of children enrolling in NYCEECs. However, we can learn something about the potential for diversity in NYCEECs by examining the admissions process and criteria.

Beginning with applications for fall 2015, NYCEECs will admit students based on a random lottery following

a set of assigned admissions priorities, parallel to the system used for district school UPK programs. The list of enrollment priorities for NYCEECs, however, is different, posing a separate set of obstacles and opportunities for creating diverse classrooms (see Table 2).

On one hand, there are no geographic preferences in NYCEECs, which opens up opportunities for enrolling families from different neighborhoods. Families may select an NYCEEC because it is close to their home, but they may also be willing to travel further to a program that particularly appeals to them. They might also choose a location that is close to work or near a grandparent or other caregiver who can pick their child up after school. For example, at Little Star of Broome Street Day Care in the Lower East Side of Manhattan, a large portion of UPK children come from Chinese-

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TABLE 2 STANDARD ADMISSIONS PRIORITIES FOR NEW YORK CITY EARLY EDUCATION CENTERS

1. Current students enrolled at the NYCEEC (for the 2014–15 school year) matriculating from three-year-old programs.

2. Siblings of current students enrolled at the NYCEEC.

3. Students whose families currently receive free or subsidized social services from the organization operating the NYCEEC pre-K program.

4. Students speaking a native language other than English that the NYCEEC specializes in serving.

5. All other students.

Source: 2015 Pre-K for All, directories for each borough, New York City Department of Education, http://schools.nyc.gov/ChoicesEnrollment/PreK/Resources/default.htm.

American families living in Brooklyn who choose to travel to the school because of the school's ability to provide Chinese-language support and because the location is convenient to some parents' workplaces. At the same time, the center also serves some families from the surrounding neighborhood who are higher-income, and who were attracted to the center's proximity.

On the other hand, NYCEECs provide priority in UPK admissions for children who are enrolled at the center already as three-year-olds, who have siblings at the center, or who receive social services from the community-based organization operating the NYCEEC. These preferences certainly make sense as a means of promoting continuity for families; however, they may also serve to reduce the level of socioeconomic mixing that might otherwise occur. At Little Star of Broome Street, the three-year-old program is a publicly funded program only available to low-income families that charges tuition on a sliding scale, often charging a family with two children as little as \$15 a week for full-time care. Thus, all of the families matriculating from the program for three-year-olds to UPK are lower-income. By contrast, at NY City Explorers Academy in downtown Brooklyn, yearly fulltime tuition for three-year-olds is \$25,400. The center offers some private scholarships for families, but by and large children that move from the three-year-old program to UPK are from families who previously paid private tuition fees. Because UPK classrooms are usually larger than classrooms for three-year-olds, based on different regulations for maximum class size, NYCEECs typically have at least a few seats in UPK open to outside students even if they retain a high percentage of three-year-olds for UPK, and these seats can be an opportunity for increasing diversity of enrollment. However, opportunities for bringing in new families may be limited.

Furthermore, a number of NYCEECs receive funding from ACS or Head Start in addition to UPK, providing additional hours of child care or other services to families. At these sites, typically only families who qualify for these particular programs—usually based on income or home address—are eligible to attend. According to the Department of Education, in 2014–15, roughly 350 NYCEECs throughout the city received full or partial funding from ACS.

Special Programs for English Language Learners and Students with Disabilities

The city's plans for UPK expansion also include special classroom models that could be tools in promoting integration with respect to English language learners and students with disabilities—valuable goals in their own right that may also encourage socioeconomic and racial integration as a secondary effect.

The Department of Education currently operates ten dual-language pre-K programs in Chinese or Spanish. These programs, which are all located in district schools, evenly split enrollment between native speakers of English and of the other language, and they are designed to help all students in the class become bilingual.⁶⁰ In addition, ninety-one NYCEECs offer enhanced language instruction in a language other than English. While this model primarily focuses on supporting students in their home language, exposure to a second language at these NYCEECs can also be a draw for English-speaking families. Some of these NYCEECs with enhanced language instruction are working towards building a dual-language model with equal enrollment of native English speakers and native speakers of the other language.⁶¹

In addition, the Department of Education is working to make sure students with disabilities and general education students have the chance to learn alongside each other when possible. Pre-K students with disabilities may require a variety of services and educational settings depending on their individualized education programs. These students typically receive separate funding to meet these needs, and some may require specialized classrooms, including in private settings. However, the Department of Education has committed to making special education services available in more UPK classrooms so that fewer students with disabilities have to be in separate classrooms. Department of Education has reserved 5 percent of UPK seats for integrated co-teaching UPK classrooms, in which general education students (funded by UPK) and students with disabilities (funded through a separate source) are enrolled together in a single classroom with two lead teachers, one teacher certified in special education and the other certified in general education.

How to Increase Opportunities for Diversity in UPK Classrooms

The data suggests there are real opportunities for integrated UPK classrooms, but also a number of barriers to diverse enrollment. As the Department of Education continues to improve UPK, a number of policy changes would increase opportunities for socioeconomic integration.

• Collect better data. The first step toward encouraging more integrated classrooms is getting an accurate picture of current UPK demographics at the classroom level. Unfortunately, current data is insufficient. Indeed, lack of good classroom-level data is a challenge even at the K-12 level, an issue that has attracted the attention of some local legislators and advocates. New legislation introduced in the New York City Council in 2014 would require the Department of Education to report more robust statistics on demographics and enrollment in each public school annually.⁶² Providing classroom-level data, and including NYCEECs as well as UPK programs in public schools, takes that recommendation one step further.

In coming years, the Department of Education should continue collecting information on race/ ethnicity, gender, special education status, English language learner status, primary home language, and address of residence for all pre-K children. In addition, the Department of Education should create comparable measures for socioeconomic status across all UPK sites, using data that is already being collected, by matching the names and addresses of children at both public school UPK programs and NYCEECs with Human Resources Administration (HRA) data to determine if a child's family is eligible for social services. Furthermore, the administration should compile and analyze this data across all UPK enrollments as well as at the classroom-level.

In addition, the Department of Education should ensure that research and evaluation efforts collect more robust information on socioeconomic status from a sample of New York City parents, and private and public research partners should help fund this work. Collecting sensitive information of family backgrounds raises valid privacy concerns, but the Department of Education should stress the goal of improving the quality of UPK.

Subsidize transportation. In a city with high levels of residential segregation, bringing together children from multiple neighborhoods is an important strategy for diverse enrollment. However, at the pre-K level, the option of traveling to a program of choice is limited to New Yorkers who can afford to make the journey. The city provides K–12 students who live more than a certain distance from their school with yellow bus service or free or reduced-fare transit cards.⁶³ However, at the pre-K level, transportation is not currently provided, except for children with special needs.⁶⁴

The city should follow the lead of other major pre-K programs in cities such as Hartford, Connecticut, and New Orleans, Louisiana, by providing transportation for pre-K families as well. In Hartford, for example, a regional magnet school system provides three- and four-year-olds from the city with transportation to suburban pre-K programs, while suburban families sending their children to pre-K in the city are eligible for a daily transportation stipend to subsidize the cost of driving or taking transit. Even a partial transportation program in New York City, offering transit passes only or limiting eligibility to low-income families, could open some new opportunities for families to travel to integrated UPK programs outside their immediate neighborhoods.

• Revise enrollment priorities for district school UPK programs. Currently, UPK programs in district schools face the same barriers to integration seen at the elementary school level: attendance zones and district boundaries that often echo and sometimes magnify residential segregation. At the pre-K and K-12 level, New York City should consider moving more schools to pro-diversity student assignment processes, with lottery preferences that balance enrollment across schools based on student socioeconomic status. A number of school districts across the country, including Cambridge, Massachusetts, and Champaign, Illinois, currently use similar "controlled choice" student assignment plans to encourage school integration, and parents and leaders from several community school districts in New York City have led a push for this change over the past few years.⁶⁵

In the meantime, enrollment priorities for UPK in district schools should be brought in line with the priorities for kindergarten enrollment. The current admission priorities for district pre-K are even more geographically focused than the admissions priorities for kindergarten-not only giving preference first to students in the zone, then in the district, before out-of district students, but also giving preference to students in the same borough before moving to outof-borough students.⁶⁶ The Department of Education should drop the in-borough pre-K admissions lottery preference, which has no precedent in the already geographically focused kindergarten preferences. Doing so may allow more families to choose programs based on proximity to work or family members, or desirability of the program, and perhaps increase the possibility for diverse enrollment.

• Enable blended funding. Most NYCEECs with ACS, Head Start, or other public funding in addition to UPK funds enroll only students who qualify for these supplemental services. However, some of these programs do enroll a mix of students who qualify and others who do not. For example, at University Settlement's Park Slope North-Helen Owen Carey Child Development Center in Brooklyn, some UPK children qualify for subsidized child care from ACS that offers additional hours of child care beyond the six-hour, twenty-minute UPK day on a sliding scale. Other children at the center that do not qualify for reduced tuition through ACS attend UPK for the six-hour, twentyminute day only or pay private tuition to cover the cost of additional hours of care. This mixed enrollment strategy is a strong model for promoting integration; however, thus far centers have faced a number of legal and administrative hurdles that limit or prevent blending funding in this way. The staff at Park Slope North-Helen Owen Carey, for example, were told that they must enroll ACS-funded and non-qualifying students in separate UPK classrooms. However, the center opted to maintain blended classrooms-to the detriment of receiving full funding from the Department of Education-in order to provide equal educational opportunity to all students.

Officials at Department of Education reported that for fall 2015, the department has committed to explicitly allowing providers to serve pre-K students funded through different programs in the same classrooms, including blending UPK, ACS, Head Start, and private tuition funds. This important policy change could open many new opportunities for integrated preschool classrooms across the city if legal and funding issues are resolved to create a clear pathway for providers, and if the Department of Education works to encourage NYCEECs to take advantage of this new opportunity. The Department of Education should reach out to ACS- or Head Start-contracted service providers with records of success and encourage them to add UPK classrooms that mix ACS- or Head Start-funded students with "UPK-only" or "UPK plus tuition" children.

• Expand UPK slots at NYCEECs in easily accessible neighborhoods. Scarcity of space in New York City means that the locations of new UPK sites are often determined by the availability of facilities. But when possible, the Department of Education should prioritize creating new UPK slots in NYCEECs that are easily accessible to New Yorkers of many different backgrounds, either because they are situated on the boundaries of different neighborhoods or because they are easily accessible by public transportation. In particular, this feature could open doors to diverse enrollment when coupled with transit funding for low-income pre-K families, as suggested earlier.

• Encourage families to consider a wider range of programs. Family choice is a cornerstone of UPK. Families select which programs they want to apply to and are encouraged to visit programs to find a good match. Over the past year and a half, the Department of Education has created impressive tools for parents to explore program offerings—printed guides for each borough, an interactive online map, and a text message hotline. Thus far, this information has been organized primarily by location. As UPK grows, the Department of Education should develop more robust tools to allow parents to search for specific program features, allowing them to search for a UPK where students take dance classes or that uses Montessori methods, for example. Location is just one of many reasons that families choose preschools, but it is often the easiest factor for which to screen. If given the option, more families might prioritize other program features over location, and those decisions could increase opportunities for integrating children from different backgrounds in the same UPK classrooms.

As New York City works to build and sustain highquality UPK, classroom diversity must be considered as an important factor for program quality. UPK faces some of the same structural challenges that perpetuate segregation in K–12 education; however, the combined system of public school and CBO-operated sites and the focus on parent choice create new potential for integration not seen at the K–12 level. With the right supports, there could be more socioeconomically and racially diverse UPK classrooms across the city, but in order to achieve that goal, the Department of Education must increase its commitment to integration through policy changes that open and encourage these opportunities.

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