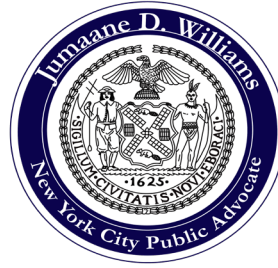




THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
BRAD LANDER



March 2, 2022

Honorable Eric L. Adams  
Mayor of the City of New York  
City Hall  
New York, NY 10007

Dear Mayor Adams,

We write to you today with deep appreciation for the critical task of leading the City back from the devastating and complex effects of the pandemic, and for your ongoing emphasis on a recovery centered in equity, safety, and prosperity for all New Yorkers.

As the case numbers, hospitalizations and deaths associated with Omicron drop, we agree it makes sense for the City to move forward with easing COVID-19 restrictions. However, [as you yourself have said](#), those efforts must be grounded in public health data, with systems in place to detect future variants and surges early, to respond to them rapidly, to increase vaccination rates, and to protect our most vulnerable communities.

Scientists advise that we should expect future COVID-19 variants later this year. While we cannot live our lives paralyzed by fear, it would be foolish and dangerous not to be prepared. While New York City has broadly done a strong job of vaccination, [recent school-by-school data](#) shows how dramatically uneven that protection is – in a next wave, we know which communities would suffer. And we have among us many immunocompromised and vulnerable New Yorkers; a compassionate city owes them the opportunity to live safe and full lives.

As you consider the process for lifting the school mask mandate on 3/7 and easing other restrictions, we write to offer suggestions for doing so in a manner that keeps our city prepared and maintains the safety of all our schools and communities.

### Keeping the City prepared

- **Preserve a broad surveillance testing program.** We are able to ease restrictions now because transmission rates are low. We must continue to test broadly, in public and private health clinics and in our schools, make data broadly available, and watch transmission closely. While the shift to home-based testing makes testing more accessible, we also need the ability to watch rates in order to stay prepared.

- **Make clear to New Yorkers what the metrics are for easing and imposing new restrictions going forward.** As you proposed during the campaign, New Yorkers need to know the indicators for when a variant is rising, and how that relates to public action. We can't wait until the next variant arrives to know what we are watching for and how we'll respond. We need clear metrics – vaccination, transmission, and hospitalization rates, in schools and communities – those that have allowed the school mask mandate to be removed, and would trigger renewed masking and social distancing. We know that such public health data may vary based on block, district, and borough, which if not considered in such decision making could lead to a disproportionate impact on our most vulnerable communities hit hardest by the pandemic and ongoing, many of which are Black and brown communities across our city. These metrics should be shared publicly and transparently when any policy changes take place regarding but not exclusively schools, public libraries, restaurants, small businesses, gyms, and more.
- **Prepare now to rapidly expand our testing and response capacity at the first sign of a next variant or surge.** When both Delta and Omicron hit, it took the City weeks to surge our testing clinics and response. There is no reason to be caught flat-footed again. We should work with vendors to be ready to surge our response capacity quickly.
- **Maintain adequate public health infrastructure and personnel.** Over the past two years, the City has established a pandemic public health infrastructure, funded by federal COVID relief dollars, including the Test+Trace Corps and community health workers. While new CDC guidance moves away from contact tracing, we should thoughtfully preserve a sufficient public health infrastructure.
- **Keep a focus on vaccination and education in vulnerable communities.** That public health infrastructure should focus on outreach, education, and vaccination in the communities that have been hit hardest by COVID-19 and where vaccination rates remain low.

### **Keeping our schools safe**

- **Announce a requirement for full COVID vaccination for students to return to school next fall,** as part of the City's standard vaccination requirements. As you have said, increasing vaccination rates is the most effective thing we can do to promote public health. However, only 57% of NYC public schools have a majority of their students fully vaccinated. Within the NYC boroughs there are significant disparities in rates of hospitalization and student vaccination between neighborhoods within the same borough. For example, while schools in School District 15 in Park Slope, Brooklyn have students that are overwhelmingly (73%) fully vaccinated in a community with relatively low hospitalization numbers, District 23 in Brownsville, Brooklyn has a student vaccination rate of just 38% with community hospitalization rates of up to 10 times that of some District 15 neighborhoods. The best thing we could do to address this gaping disparity is let families know that full vaccination will be required next fall. The timetable to achieve full vaccination should be shared with parents this spring, to ensure time for compliance.

- **Continue the in-school COVID testing program.** We appreciate the work that has been done to increase the in-school testing program in recent months, in an effort to reach the levels recommended by the CDC. These levels should be maintained. In addition, we continue to support a shift to opt-out testing in schools, rather than the current opt-in approach, especially where full vaccination rates remain low.
- **Commit to ensuring that communications of school related COVID policies are communicated to families in the official New York City languages, including Spanish, Chinese, Russian, Korean, Italian, French, Haitian Creole, Bengali, Urdu, Arabic, Polish and English.** Families should be able to access critical information from their schools and the Department of Education in the official city languages; additionally the administration should engage community based organizations and partners to ensure such important information reaches families who may speak languages other than the official city languages.
- **Focus COVID-19 testing, outreach, and on-site vaccination/booster clinics** on schools that new DOE data show have low student vaccination rates, and continue to regularly release school-by-school vaccination data to adapt local outreach as needed.
- **Develop a long-term ventilation and air quality strategy to move past stop-gap measures.** Our City must move toward solutions that create safe and healthy learning environments. Proper ventilation and air quality management are a core component of COVID-19 prevention, can also help mitigate the spread of other disruptive airborne viruses like the flu, and produce better academic outcomes and reduced absences. The DOE and SCA must invest resources towards ensuring that every classroom and every school building is equipped with best-in-class air filtration and ventilation systems (which includes retiring fossil fuel combustion within school buildings). Analysis by the Comptroller's Office shows that DOE has spent \$725 million on maintaining safe and clean classrooms in the current school year, but DOE has not provided data on the distribution or impact of that spending. DOE should begin to publish the data it already collects on airflow and on airborne pollutants within classrooms and should consider the benefits of outfitting every classroom with indoor air quality sensors that can dispense real-time measurements on key indicators
- **Provide every school and contracted PreK and 3K with a consistent supply of high quality masks** for educators and students who may want them on a daily basis. We have heard reports of teachers only being allotted one mask per week, and preschool operators forced to wait on PPE supply lines at locations that may or may not be open on any given day. Once the mask mandate is removed high quality masks must be readily accessible to all who still want or need them.
- **Offer an opt-in approach for teachers and students who wish to remain in all-masked classrooms.** Across our tremendously diverse schools, many of our teachers, staff, and students are either immunocompromised themselves, or have vulnerable members of their households. We want these valued members of our school communities to be safe and secure in our schools. One way to achieve this goal would be to enable principals to offer opt-in, all-masked classrooms or settings for those who need or want them.

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At every level of government, so many policies over the last two years have been confusing to communities and divorced from the science. As you move forward to ease COVID-19 restrictions, please take this opportunity to provide clear, consistent messaging to families and educators about the metrics you are using to ensure their safety, require full COVID vaccination for all students in the fall, and work proactively in updating important layers of protection such as more robust testing protocols, and dedicated funding for serious and urgent improvements in ventilation and school air quality management -- we need those things now and into the future.

Thank you for your attention to these urgent matters for protecting the health and safety of all New Yorkers. We look forward to partnering with you in our City's recovery.

Sincerely,



Brad Lander  
New York City Comptroller



Jumaane D. Williams  
New York City Public Advocate

cc: Dr. Dave A. Chokshi, Commissioner of the New York City Department of Health and Mental Hygiene