## Exhibit 7

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Case No. 1:18-cv-11657

CHRISTA MCAULIFFE INTERMEDIATE SCHOOL PTO, INC., et al.,

Plaintiffs,

٧.

BILL DE BLASIO, in his official capacity as Mayor of New York, et al.,

Defendants,

and

TEENS TAKE CHARGE, et al.,

Defendant-Intervenors.

## DECLARATION OF NAYIM ISLAM (DESIS RISING UP AND MOVING)

Nayim Islam, pursuant to 28 U.S.C. § 1746, declares the following:

- 1. I am the Immigrants' Rights Organizer for Desis Rising Up and Moving, known as DRUM.
- 2. DRUM was founded in 2000 to build the power of South Asian and Indo-Caribbean low wage immigrants, youth, and families in New York City to achieve economic justice and civil and immigrant rights.
- 3. DRUM programs include YouthPower!, a youth-led program that builds the leadership and power of low-income Desi youth in NYC to work towards educational and immigrant justice. YouthPower! members are ages 13-21 and attend NYC public schools, public colleges, and/or are low-wage workers.
- 4. Through political education and campaign skills development, YouthPower! seeks to build a new generation of working-class community leaders, run campaigns led by youth to change public policies that impact their own lives, and build alliances with youth of color across the city and nationally.

- 5. As a part of its education work, DRUM and the YouthPower! program have advocated for equitable access to New York City's Specialized High Schools for many years, including joining other New York City groups and students to file a complaint with the U.S. Department of Education Officer of Civil Rights challenging the unfair admissions process for the Specialized High Schools.
- 6. DRUM is interested in the continued operation of the expanded Discovery Program and additional efforts to make the Specialized High Schools open to a more diverse range of students. The test-based process for admissions to the Specialized High Schools unfairly excludes low-income students of color, particularly Black and Latinx but also many South Asian and Indo-Caribbean students. Indeed, certain ethnic groups are grossly under-represented in the Specialized High Schools, in part because they attend under-resourced NYC public schools that do not prepare them to take the SHSAT. These Asian-American students, who are members of DRUM belong to one of the several low-income Asian-American subgroups that find themselves excluded from educational opportunity in New York City.
- 7. DRUM also believes that diverse classrooms are important to all students, including those who attend Specialized High Schools. Classrooms that are diverse across many characteristics and at the intersection of various identities allow students to learn from one another's different experiences and outlooks and to learn to work with one another. For example, not all Asian Americans are alike, not merely ethnically, but also socioeconomically and culturally. Representation of that diversity within the Asian American community at the Specialized High Schools is critically important.
- 8. Members of DRUM have benefited from the Discovery Program in the past and others hope to apply to Specialized High Schools in the near future.
- 9. For example, one student member of DRUM was admitted to a Specialized High School through the Discovery Program last summer. That student was, simultaneously, a Discovery Program student and a summer intern at DRUM. He would go to Discovery in the morning and go straight to DRUM afterwards. He now has above a 90 average and has been excelling in school.
- 10. Many DRUM members, particularly those in the Bronx and in South Queens, attend or have children who attend middle schools with high economic need. They will benefit from the expanded Discovery Program which will increase their potential to attend a Specialized High School and if they do attend, will improve the diversity of their educational environment.

- 11. We have other members who are working-class parents of middle school students who attend schools with a low ENI that is, higher economic resources. Those parents nonetheless believe that students at high-ENI schools are the ones who should benefit from the increased opportunity that the expansion of the Discovery Program represents.
- 12. For example, DRUM member Shefali Begum Shaheen acknowledges that her daughter won't benefit from the program because she does not attend a high-poverty middle school. Her daughter attends a middle school with an ENI of 31. But Ms. Shaheen still feels strongly that students who are low-income and attend high-ENI, under-resourced schools deserve an opportunity to attend the Specialized High Schools. She believes that students who come from these backgrounds who have parents who can't pay for prep and support, but who also go to schools with few resources have double obstacles. Without assistance, assistance, these students wouldn't have the opportunity to get in, even with their own hard work. If these students just miss the score, this program would lift them up.
- 13. DRUM's interest on behalf of its members also resonates with me personally: I attended a Specialized High School and was admitted through the Discovery Program. I graduated from Brooklyn Tech in 2010.
- 14. In my middle school, less than a dozen people had ever gotten into a Specialized High School and I was the only one from my class that was admitted, even through the Discovery Program. My counselor was shocked when I was admitted, because it was such a rare occurrence at my middle school. My acceptance was also especially unusual, because I was an undocumented kid from a low-income, South Asian, immigrant background.
- 15. As for preparing for the test, my middle school did not offer an after-school prep program like some schools do. But, in my community, the SHSAT was big business, even for families with little means. This was the case because immigrant parents in my community believed that the Specialized High Schools were the pathway to a great college education, and parents with limited English ability might not be able to help their kids with homework or school in other ways, but they did whatever they could to help their kids achieve success on this test. And standardized test prep companies took advantage of that desire.
- 16. My parents sacrificed so that they could send me to a private tutoring center. They saved money by walking everywhere instead of taking the train in order to save up. I also sacrificed a childhood. Rather than spending weekends on school, friends, family, or

other activities, I studied for this single test as part of a test prep course for roughly about twelve hours every weekend for six months. The tutoring did not enrich my academic studies, it only prepared me to be successful on the test.

- 17. When I finally met other students at Brooklyn Tech, I realized that there were students who had attended better-resourced schools in the City, and who had learned what they needed to prepare for not only the SHSAT but for the Specialized High Schools. What they learned in private school or well-funded public schools, I had to learn in tutoring.
- 18. I learned through that experience that the SHSAT unfairly disadvantages students who don't have the economic or social resources, personally or at their academic institutions, and gives advantage to students who do. Single-test admissions are, in that way, unfair and are not the best way to assess who should be admitted to the Specialized High Schools.
- 19. The Discovery Program is the mechanism that gives those of us from underrepresented, immigrant, working-class backgrounds like me and similarly-situated DRUM members the additional support we need when we fall short due to the inherent inequity of single-test admissions. The Discovery Program is essential not only to increasing diversity at the Specialized High Schools, but to addressing the inequities of accessing the Specialized High Schools.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed April 5th, 2019

Nayim Islam