

COURT OF APPEALS OF THE STATE OF NEW YORK

Campaign for Fiscal Equity, Inc. v. State of New York

100 N.Y.2d 893, 801 N.E.2d 326, 769 N.Y.S.2d 106 (2003) · Decided June 26, 2003

SUMMARY

The New York Court of Appeals considered whether New York State violated the Education Article of the New York Constitution by failing to provide New York City public schoolchildren with the opportunity for a sound basic education. The court held that the constitutional standard includes preparation for meaningful civic participation and competitive employment, and found deficiencies in teaching quality, class size, and educational resources supported the trial court's findings. The court dismissed the plaintiffs' Title VI claim in light of *Alexander v. Sandoval* and otherwise reversed the Appellate Division.

CASE DETAILS

COURT	Court of Appeals of the State of New York
WRITING FOR THE COURT	Chief Judge Kaye; Judge Smith; Judge Ciparick; Judge Rosenblatt; Judge Read; Judge Graffeo
JURISDICTION	New York
DECIDED	June 26, 2003
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiffs appealed as of right from a divided Appellate Division order reversing the trial court's judgment in a constitutional education-finance action.
STANDARD OF REVIEW	The Court reviewed the Appellate Division's factual determinations under CPLR 5501(b), determining which findings more nearly comported with the weight of the credible evidence, and reviewed the constitutional and remedial issues as questions of law.
PRECEDENTIAL VALUE	Published, precedential opinion of the New York Court of Appeals
PARTIES	Campaign for Fiscal Equity, Inc., et al. v. State of New York, et al.

TOPICS

- constitutional law
- municipal law
- civil rights

PRACTICE AREAS

QUESTIONS PRESENTED

1. What constitutes the constitutionally required sound basic education under article XI, § 1 of the New York Constitution?
2. Whether the evidence established that New York City public school students were denied the opportunity for a sound basic education.
3. Whether plaintiffs established a causal link between New York's school funding system and the deficiencies in New York City educational inputs and outcomes.
4. Whether the State's agents' management failures, local funding decisions, socioeconomic conditions, or other causes defeated plaintiffs' constitutional claim.
5. Whether the trial court's statewide remedial directives were proper and what remedy was constitutionally appropriate.
6. Whether plaintiffs' Title VI claim survived *Alexander v. Sandoval*.

HOLDINGS

1. Article XI, § 1 guarantees New York students the opportunity for a meaningful high school education that provides the essential facilities, instrumentalities of learning, and teaching necessary to prepare them to function productively as civic participants and to compete for employment that permits self-support.
2. The trial court's findings that New York City schools lacked adequate teaching, facilities, classrooms, and instrumentalities of learning, and produced inadequate educational outcomes, more nearly comported with the weight of the credible evidence and established a violation of the Education Article.
3. Plaintiffs established the required causal link between the State's funding system and the failure to provide a sound basic education; contributing socioeconomic, municipal-management, special-education, teacher-employment, or local-funding causes did not constitute supervening causes defeating the claim.
4. The remedy must be limited to the New York City public schools and must require the State to ascertain the actual cost of providing a sound basic education in New York City, enact appropriate funding and governance reforms, ensure necessary resources at every New York City school, and establish accountability measures to determine whether the reforms work.
5. The Title VI claim was properly dismissed because *Alexander v. Sandoval* foreclosed the asserted private right of action to enforce disparate-impact regulations promulgated under Title VI.

KEY QUOTATIONS

“The issue to be resolved by the evidence is whether the State affords New York City schoolchildren the opportunity for a meaningful high school education, one which prepares them to function productively as civic participants.” (100 N.Y.2d at 906)

“Relative to the State, the City has “absolutely no control” over the school funding system” (100 N.Y.2d at 925)

“Reforms to the current system of financing school funding and managing schools should address the shortcomings of the current system by ensuring, as a part of that process, that every school in New York City would have the resources necessary for providing the opportunity for a sound basic education.” (100 N.Y.2d at 930)

FACTUAL BACKGROUND

New York City's public school system served approximately 1.1 million students, most of whom were racial minorities, poor, or limited in English proficiency. The trial record showed deficiencies in teacher certification, experience and retention; overcrowded classrooms; inadequate libraries and computer equipment; low graduation and high dropout rates; and poor examination results. The Court found that these deficiencies denied students the opportunity for a sound basic education and were causally related to the State's funding system, although other governance and management reforms could also be part of the remedy.

PROCEDURAL HISTORY

The Court of Appeals previously denied the State's motion to dismiss, holding that plaintiffs stated claims under the Education Article of the New York Constitution and federal Title VI regulations, and remitted for factual development. After a seven-month trial involving 72 witnesses and approximately 4,300 exhibits, Supreme Court found that New York State had violated its constitutional duty and Title VI and ordered systemic reforms. The Appellate Division reversed on the law and facts, rejected the trial court's definition of a sound basic education, and dismissed the Title VI claim under *Alexander v. Sandoval*. The Court of Appeals modified the judgment, affirmed dismissal of the Title VI claim, otherwise reversed the Appellate Division, and remitted for further proceedings and a New York City-specific remedy.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to Supreme Court for further proceedings consistent with the opinion. The State must ascertain the actual cost of providing a sound basic education in New York City, enact appropriate financing and governance reforms, ensure that every New York City school has the resources necessary to provide the opportunity for a sound basic education, and establish accountability measures. Defendants were given until July 30, 2004, to implement the necessary measures.

CASES CITED

- Campaign for Fiscal Equity v. State of New York, 86 N.Y.2d 307 (1995)
- Board of Educ., Levittown Union Free School Dist. v. Nyquist, 57 N.Y.2d 27 (1982)
- Alexander v. Sandoval, 532 U.S. 275 (2001)

- Paynter v. State of New York, 100 N.Y.2d 434 (2003)
- City of New York v. State of New York, 86 N.Y.2d 286 (1995)
- Matter of Board of Educ. of Northport-E. Northport Union Free School Dist. v. Ambach, 90 A.D.2d 227 (3d Dep't 1982), aff'd, 60 N.Y.2d 758 (1983)
- Robinson v. Cahill, 63 N.J. 196, 306 A.2d 65 (1973)
- Abbott v. Burke, 119 N.J. 287, 575 A.2d 359 (1990)
- Rose v. Council for Better Educ., Inc., 790 S.W.2d 186 (Ky. 1989)

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