



Public Comment Analysis

Date: February 2, 2011

Topic: The Proposed Phase-out of Norman Thomas High School (02M620)

Date of Panel Vote: February 3, 2011

Summary of Proposal

Norman Thomas High School (02M620, “Norman Thomas”) is an existing 9-12 school located in building M620 (“M620” or the “Norman Thomas Campus”) at 111 East 33rd Street, New York, NY 10016, within the geographical confines of Community School District 2 (“District 2”). The New York City Department of Education (“DOE”) is proposing to phase out Norman Thomas based on its poor performance and the DOE’s assessment that the school lacks the capacity to turn around quickly to better support student needs. The Educational Impact Statement (“EIS”), posted on December 20, 2010 and amended on January 20, 2011, describing this proposal can be accessed on the DOE’s website at <http://schools.nyc.gov/community/planning/changes/manhattan/normanthomas>.

If the proposal to phase out Norman Thomas is approved, Norman Thomas would no longer admit new ninth-grade students after the conclusion of the 2010-2011 school year. Current students would be supported as they progress towards graduation while remaining enrolled in Norman Thomas. In cases where students do not complete graduation requirements by the closure date (June 2014), the DOE will help students and families identify alternative programs or schools that meet students’ needs so that they may continue their high school education after Norman Thomas completes phasing out.

Norman Thomas is currently co-located with Murray Hill Academy (02M432, “Murray Hill”). Murray Hill is a new school that opened in September 2010 with a cohort of ninth-grade students. Murray Hill will continue to expand until it reaches its complete grade span of 9-12 during the 2013-2014 school year regardless of whether this proposal is approved.

The DOE also plans to propose to re-locate Manhattan Academy for Arts & Language (02M427, “Manhattan Academy”), a new school that opened in September 2010, and Unity Center for Urban Technologies (02M500, “Unity”), an existing 9-12 school, in building M620. That proposal will be described in a separate EIS to be released in February 2011.

Manhattan Academy is currently incubating in building M503 (“M503”), the United Federation of Teachers (“UFT”) headquarters, located at 52 Broadway, New York, NY 10004, within the geographical confines of District 2. It currently enrolls only ninth-grade students and was originally proposed to phase in to the Norman Thomas Campus last year. However, a lawsuit prevented the Department from following through with those plans. Unity, an existing 9-12 school, is currently located in school building M897 (“M897”) located at 121 Sixth Avenue, New York, NY 10013, within the geographical confines of District 2. If the proposal to co-locate Manhattan Academy and Unity is approved, both schools will open in building M620 in September 2011. Manhattan Academy would continue to expand to full scale as it adds one grade level every year until reaching its full grade span of 9-12 and Unity would continue to serve students at its current enrollment level.

If the proposals to phase out Norman Thomas and co-locate both Manhattan Academy and Unity are approved, there would still be sufficient space in the M620 building to co-locate another school beginning in the 2012-2013 school year. The DOE may consider co-locating a new school in building M620 in 2012-2013 in order to optimize space and create additional new high-quality educational options for students in the community.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at M620 on January 21, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 55 members of the public attended the hearing, and 12 people spoke. Present at the meeting were: Community Education Council (“CEC”) President for District 2 T. Elzora Cleveland; CEC 1st Vice-president for District 2 Shino Tanikawa; CEC 2nd Vice-president for District 2 Sarah Chu; Norman Thomas’ School Leadership Team (“SLT”) parent representative Beverly Wright; Norman Thomas’s SLT student representative Adeline Johnson; UFT Director of Staff Leroy Barr; UFT Chapter leader John Schley; Deputy Chancellor Marc Sternberg; and Melissa Harris from the DOE’s Office of Family and Information (“OFIA”).

The following comments and remarks were made at the joint public hearing:

1. Sarah Chu, CEC representative for District 11, asserted that:
 - a. The school’s 4-year graduation rate has been improving, and the Regents diploma rate has been improving over the past 3 years.
 - b. It is very difficult to demonstrate rapid improvement for such a large school.
 - c. If the only option is to phase out Norman Thomas, then we must support remaining students who cannot transfer out.
 - d. Incentives to graduate (after school program, electives, etc.) are being phased out which deter students from graduating. The DOE should not turn their back on the students that remain.
2. A commenter expressed the opinion that:
 - a. The principal evaluated strengths and weaknesses and assessed that the school be divided into four small academies which allowed for meaningful connection between teacher and student—before this, teachers couldn’t help students on such an individual level.

- b. Teachers and students really collaborate on all levels now—eat together, work together, and help one another.
 - c. Data use has increased tremendously, and applied that towards student literacy.
 - d. Graduation rate increased by 10%.
 - e. Discipline incidents decreased.
 - f. The school also offers a program for under-credited students.
 - g. The school placed 1st, 2nd, and 4th Citywide on the Virtual Enterprise Business Plan competition the same week they were told they were slated for phase out.
3. A commenter asserted that:
- a. Norman Thomas doesn't close its doors to any student.
 - b. The school has transitioned into smaller units, smaller communities, and smaller divisions.
 - c. There is not a high turnover of students or teachers here.
4. A commenter expressed the opinion that:
- a. The DOE did not provide support for the school, and after trying to close it just further discouraged new students from coming to Norman Thomas.
 - b. The school did not have a Comprehensive Education Plan ("CEP") in the fall, only in the spring.
5. A commenter asserted that:
- a. Through Future Business Leaders of America, DECCA, and the Association of Marketing Students, and Virtual Enterprise, our students have won over 100 awards in the last ten years at the City, State, and international levels.
 - b. The school's Career and Technical Education ("CTE") programs and youth leadership programs play an instrumental role at Norman Thomas.
6. Multiple commenters asked that the DOE to engage with the community and listen to community feedback.
7. A commenter asserted that the statistics are wrong; this school is not a story of failure.
8. A commenter asserted that her daughter is the valedictorian and received a great education from this school. The staff and parents are very supportive of students and the school is the children's home.
9. A commenter expressed the opinion that:
- a. The school has a strong Virtual Enterprise CTE program.
 - b. The school won the business plan competition.
 - c. The school has not been given enough time to improve. The principal has been here for 2 years and has already made drastic improvements.
10. A commenter expressed the opinion that the teachers and staff are devoted and committed to their students. The 4 small schools are meeting the needs of their students. And the DOE should give the school the opportunity to succeed.
11. A commenter expressed the opinion that:
- a. The DOE constantly changes benchmarks for data but this school does continue to improve.
 - b. The DOE has turned education into a game and manipulated data.
 - c. Teachers at Norman Thomas care about their students.
12. A commenter asked why Mr. Martin, Norman Thomas' principal, was given only one year to turn around the school when it takes five.

13. A commenter asked why the Bloomberg Administration is a proponent of small schools and why some of the schools on the phase-out list for next year are new small schools.

Summary of Issues Raised in Written and/or Oral Comments Submitted to the DOE

14. The DOE received a comment concerning all phase-out proposals calling for a moratorium on school closings, which stated that the DOE is the servant of the people and is not acknowledging the community's opposition to these proposals. The commenter suggested a facilitated discussion process which would work towards consensus.

Analysis of Issues Raised, Significant Alternatives Proposed and Changes Made to the Proposal

With regard to comments 1(a-b) and 2(d) related to the school's academic progress: Norman Thomas has struggled for more than a decade, with graduation rates remaining around or below 50%. The 4-year graduation rate (including August graduates) at Norman Thomas in 2009-2010 was 50%. Although last year's 4-year graduation rate represents a significant improvement from the 42% the school achieved in 2007-2008, this graduation rate is still well below the Citywide average of 63%. In fact, this graduation rate puts Norman Thomas in the bottom 9% of high schools Citywide for 2009-2010. If Regents diplomas alone counted towards graduation—as will be the case next year—the 4-year graduation rate at Norman Thomas would drop to just 29%, well below the Citywide average of 46%.

Furthermore, only 62% of first-year students at Norman Thomas earned at least 10 credits in 2009-2010, placing Norman Thomas in the bottom 9% of high schools Citywide and in the bottom 5% of high schools in Manhattan in terms of credit accumulation. The situation is worse among second-year and third-year students, with only 47% and 57%, respectively, earning at least 10 credits.

As noted in the EIS posted on December 20, 2010 and amended on January 20, 2011 describing the proposed phase-out of Norman Thomas, the school earned an overall F grade on its 2009-2010 Progress Report, with F grades in each of the sub-sections of the Report. This puts Norman Thomas in the bottom 1% of high schools Citywide and in the bottom 2% of high schools in Manhattan for Progress Report scores. This represents a continuing pattern of decline for Norman Thomas, which earned an overall F grade on its 2008-2009 Progress Report and an overall D grade in 2007-2008.

In December 2010, the New York State Department of Education named Norman Thomas as one of the Persistently Lowest Achieving ("PLA") schools.

After a careful analysis of data and community feedback, the DOE has determined that the school is ill-equipped to dramatically improve student outcomes within the current structure. The DOE believes that phasing out Norman Thomas and allowing for new high-quality education options on the Norman Thomas Campus is the best thing for future students and the broader community.

With regard to comments 1(c-d) concerning Norman Thomas' program offerings and enrollment options for current students: There are no immediate proposed changes to available instructional or extracurricular programs currently offered at Norman Thomas. However, the availability of certain offerings at the school would inevitably be impacted as the school phases out, serves an increasingly smaller student population, and eventually closes. With respect to academics, Norman Thomas would continue offering all necessary classes to support current students as they work to meet graduation requirements and earn their high school diplomas. However, as total enrollment at the school shrinks, the school would likely need to scale back its elective course offerings. As appropriate, the DOE would work with Norman Thomas to ensure that students continue to have opportunities to pursue elective courses through collaborative offerings with other schools in the building, online coursework, or in partnership with higher education institutions in the City.

With respect to enrollment options for current Norman Thomas students: Current first time ninth-grade students would complete high school at Norman Thomas if they continue to earn credits on schedule. These students also have the option to participate in the High School Admissions Process in February 2011 to apply to a different high school for tenth-grade. Those interested in applying to another school for September 2011 should meet with a guidance counselor and submit a New High Schools Choice Form by February 28, 2011. For detailed information on City high schools, please refer to the Directory of New York City Public High Schools, available in print at DOE middle schools and Borough Enrollment Centers or on the DOE's website at <http://schools.nyc.gov/ChoicesEnrollment/High/Directory/default.htm>.

Current repeat ninth-grade students would complete high school at Norman Thomas if they earn credits on schedule and pass, at a minimum, their five Regents exams. As the school becomes smaller, these students would receive more individualized attention through graduation to ensure they are receiving the support they need to succeed. Students would also be encouraged to meet with a guidance counselor to review their progress towards graduation and consider applying to one of the City's Transfer High Schools. For more information about Transfer High Schools, please visit the following website: www.goingforme.org.

Current tenth, eleventh, and twelfth grade students who are on track to graduate would complete high school at Norman Thomas if they continue to earn credits on schedule. As the school becomes smaller, students would receive more individualized attention through graduation to ensure they are receiving the support they need to succeed. Students would also be encouraged to meet with their guidance counselor to discuss all of their options.

Current tenth, eleventh, and twelfth grade students who are not on track to graduate would also be encouraged to meet with a guidance counselor to review progress towards graduation and discuss all of their options. Depending on their age, academic profile, and credit accumulation, some students may be better served in one of the City's Transfer High Schools or Young Adult Borough Centers ("YABC"), which have strong track records for helping over-age, under-credited students get back on track towards graduation. In general, however, it is expected that most current Norman Thomas students would remain enrolled at the school as they progress towards graduation. Students should meet with their guidance counselor to explore their options. For additional information, please visit the following website: www.goingforme.org.

English Language Learners at Norman Thomas would continue to receive mandated services as the school phases out. Students with disabilities would also continue to receive mandated services in accordance with their Individualized Education Plans (“IEPs”).

Transfers from Norman Thomas to another school may be available for the following reasons, among others: medical issues, safety concerns, sports, or travel hardship. For more information regarding a students’ eligibility for a transfer, please see Chancellor’s Regulation A-101, available at <http://docs.nycenet.edu/docushare/dsweb/Get/Document-11/A-101%20Final.pdf>.

With regard to comments 2(a-c and f), 3(b) and 10: Norman Thomas, which is in its last year of funding, received federal funds to implement the Small Learning Communities (“SLCs”) model. A Small Learning Community is an environment in which a core group of teachers and other adults within a school know the needs, interests, and aspirations of each student well, closely monitor his/her progress, and provide the academic and other support he/she needs to succeed. Norman Thomas, with support from the DOE, transitioned from offering four CTE programs—Marketing, Office Technology, Accounting, and Travel & Tourism—into three career-themed academies or SLCs in 2010-2011—Midtown Business Academy, Media Technology Academy, and Bilingual Spanish Empire State Languages for Business Academy. As noted by multiple commenters, Norman Thomas’ transition into SLCs has helped teachers address individual student needs and monitor students’ academic progress.

Despite these structural changes, student performance and outcomes have not improved significantly over previous years. As discussed earlier in this document, Norman Thomas students continue to struggle academically. The DOE believes that only the most serious intervention—the gradual phase out and eventual closure of Norman Thomas—will address the school’s longstanding performance struggles and allow for new school options to develop in building M620 that will better serve future students and the broader community.

With regard to comment 2(e): While safety at Norman Thomas has improved over the past three years, it continues to be a concern at the school. On the 2009-2010 New York City School Survey, 21% of students reported feeling unsafe in the hallways, bathrooms and locker rooms at Norman Thomas, down from 34% in 2008-2007. Parents also reported concerns about the safety of their children, with 17% indicating that they did not feel their child was safe at school, down from 22% in 2008-2007. In addition, 31% of Norman Thomas teachers reported that order and discipline are not maintained at the school, down from 40% in 2008-2007. The DOE will continue to offer supports around safety and security to Norman Thomas as it phases out.

With regard to comments 2(g), 3(a), 5(a-b), 8, 9(a-b), 10 and 11(c): The DOE acknowledges the efforts that Norman Thomas teachers and parents have put in building a supportive community for students. The achievements of individual students who participate in leadership programs, earn awards and scholarships, and matriculate in college is truly commendable. However, the DOE is committed to ensuring that all students receive a high-quality education, and Norman Thomas’ performance data indicates that many students are falling behind and not receiving the opportunities they need to succeed.

The DOE believes that the school community will continue to care for students as it phases out.

Students currently enrolled in Norman Thomas' three academic programs would continue to have access to the academic classes they need to complete their program requirements. The DOE is also committed to helping Norman Thomas maintain its community partnerships and extracurricular offerings as the school phases out. However, as with all phase-out situations, as total enrollment at Norman Thomas decreases, the school would likely need to scale back its course offerings and programs. The DOE believes that schools that students may choose to attend if they transfer out of Norman Thomas will also offer positive cultures and caring communities to help students achieve successful outcomes.

During the phase-out of Norman Thomas, the DOE will build on our past efforts to help the school by:

- Providing teacher training around issues including curriculum planning, improving teacher practices, and tailoring instruction to individual student needs.
- Fostering opportunities for teachers and administrators to connect with colleagues in other more successful schools, allowing them to learn from one another, improve teaching and better support students.
- Facilitating partnerships with community based organizations to support youth development initiatives at the school.

With regard to comment 3(c): In 2009-2010 Norman Thomas had a teacher turnover rate of 17%. This means that almost a fifth of the faculty at Norman Thomas left the school to seek other opportunities. While the DOE works hard to keep attrition low, it cannot impede teachers from accepting other job opportunities. It's also important to consider that, often times, a high teacher turnover can be symptomatic of a school culture and community that is not working and needs a fundamental change. Regardless of the level of student or teacher turnover, the DOE believes that the proposed phase-out and eventual closure of Norman Thomas will address the school's longstanding performance struggles and allow for high-quality school options to develop.

With regard to comment 4(a) concerning the support and resources offered to Norman Thomas: All schools receive support and assistance from their superintendent and Children First Network team, a group of educators who work directly with schools. This team helps schools identify best practices, target strategies for specific students in need of extra help, and prioritize competing demands on resources and time. Each school community chooses the network whose support best meets its needs, and each network works to improve student achievement in all of its schools.

The EIS describing the proposal to phase out Norman Thomas outlines a range of instructional, operational, and leadership supports offered to Norman Thomas. In addition, a number of resources were offered to support students' social/emotional and academic needs, particularly for struggling students. In particular, the DOE offered the following supports:

Leadership Support:

- Offering extensive leadership support for the principal, including monthly coaching and frequent school visits.
- Helping the principal develop a Comprehensive Education Plan for Norman Thomas and set school goals.
- Connecting administrators with other schools to learn effective practices that could be replicated at Norman Thomas.

Instructional Support:

- Establishing Small Learning Communities and Career and Technical Education programs to increase personalization and to meet the needs and interests of all students.
- Helping the school implement the Framework for Learning observation process to identify and build on successful teaching practices.
- Training the principal, assistant principal, and teachers on Collaborative Team Teaching (“CTT”), accommodating different learning styles, individualizing instruction, instructional leadership, using ARIS and other data analysis tools, sharing best practice, analyzing data to inform instruction, how to evaluate student work, creating rubrics to guide student learning, and curriculum planning.
- Working with teacher teams to review student data and improve instruction for English Language Learners (“ELL”), special education students, and students performing below grade level, and to explore teaching practices such as Learning Rounds.

Operational Support:

- Working with the school to implement more than \$834,000 in grant funding, which was used to support summer Regents preparation programs, TeenBiz (an online tool that integrates technology into the classroom), strategies to improve school safety and student attendance, after-school and summer programs, teacher training, CTE programs, and the purchase of SMART Boards.
- Guiding the school in working with other schools on the campus to ensure efficient and coordinated use of facilities and shared spaces.
- Coaching staff on budgeting, human resources, recruiting and retaining talented teachers, and compliance issues.

Student Support:

- Providing training to guidance counselors on how to use scholarship reports and graduation tracking systems.
- Helping the school establish partnerships with Harlem Center, Grand Street Settlement, Sports and Arts Foundation, and Big Brothers Big Sisters of America.
- Identifying strategies to reduce suspensions and violent incidences at the school and to improve student attendance through data analysis and parent outreach.

For more information, please see pages 5 and 6 in the EIS:

<http://schools.nyc.gov/community/planning/changes/manhattan/normanthomas>.

Given the school’s lack of success despite supports—whether as part of a centralized effort to support all schools or individualized plans for Norman Thomas—it is apparent that Norman

Thomas has not developed the proper infrastructure to meet the needs of its students and families. The school culture and conditions have not enabled increased student achievement. It is our belief that phasing this school out and bringing in higher quality schools will provide better options for the community and families in the future.

With regard to comment 4(b): All schools have a Comprehensive Education Plan (“CEP”). Schools submit a draft of their CEP to the network for review in the fall due by November 1st. From November 1st to January 12th, the network reviews the school’s CEP and sends a feedback form with the suggested revisions to the school. From January 13th to February 4th, the school has to revise its CEP and submit a final version to the DOE through the i-Plan system. In the case of Norman Thomas, the school set goals around increasing attendance rates and the number of students passing Regents Exams in its CEP during the fall. The network is currently supporting and working closely with Norman Thomas to put structures into place that will allow the school to reach these goals.

With regard to comment 6 related to community meetings held prior to the decision to propose phasing out Norman Thomas: Our goal for every proposal is to reach out to communities prior to the publication of a phase-out proposal. The DOE attempts to talk to school leaders, parents, SLTs, CECs, and local Community Based Organizations (“CBOs”) about our ideas. Prior to issuing the proposal to phase out Norman Thomas, the DOE sought and received feedback from the Norman Thomas community about strategies to better support students and improve outcomes at the school. Specifically, superintendents held meetings with parents and the school’s SLT on November 8, 2010 to discuss what is and is not working at Norman Thomas, and how we can work together to better serve students. At these meetings, superintendents explained the factors that lead the DOE to believe the school is struggling. They also reviewed what supports had been put in place at the school already. The DOE also distributed Fact Sheets for each school with which we met. These are available on our website and spell out, in an easy-to-understand way, potential intervention strategies, the rationale behind them, relevant data, and clear instructions on how to offer feedback. We integrated much of this valuable feedback into our decisions, helping shape our decisions on which intervention to implement for a particular school.

The Panel for Educational Policy (“PEP”) will make a decision about this proposal on February 3, 2011. All public comment contained in this document will be taken into consideration by the PEP in reaching a decision.

With regard to comments 7 and 11(a-b) related to the DOE’s accountability framework: In 2007, principals signed a landmark performance agreement with the City, winning increased autonomy to run their schools in exchange for increased responsibility for the outcomes of their students. With this agreement, the educators who know best what each student needs to succeed received the authority and the resources to make the best decisions for the students in their schools. In return, they agreed to be judged on the results they deliver: the academic progress of their students.

The DOE’s Division of Performance and Accountability develops and manages the evaluations that New York City uses to hold schools accountable for student achievement, and provides data,

tools, and resources that educators and families use to improve schools and support student learning. The Progress Report, Quality Review, and New York State Annual School Report Card are three separate accountability systems used to evaluate schools in New York City.

Progress Report Grade: This letter grade (A through F) provides an overall assessment of the school’s contribution to student learning in three main areas of measurement: (I) School Environment, (II) Student Performance, and (III) Student Progress. Schools also receive letter grades in each of these three categories. Schools receive additional recognition for Exemplary Student Outcomes by students most in need of attention and improvement. The overall Progress Report Grade is designed to reflect each school’s contribution to student academic progress, no matter where each child begins his or her journey to proficiency and beyond. Schools are compared to all schools Citywide and to schools with student populations most like their own.

Quality Review Score: This separate accountability score is based on an on-site Quality Review of the school by an experienced educator. The score represents the quality of efforts taking place at the school to track the capacities and needs of each student, to plan and set rigorous goals for each student’s improved learning, to focus the school’s academic practices and leadership development around the achievement of those goals, and to evaluate the effectiveness of plans and practices constantly and revise them as needed to ensure success. The Quality Review Score is evaluated on a four point scale: Well Developed, Proficient, Underdeveloped with Proficient Features and Underdeveloped. The Quality Review Score is not incorporated into the Progress Report Grade and instead is treated as a different, equally important indicator.

New York State Annual School Report Card: This separate accountability indicator reports the school’s status under the accountability system New York State has adopted under the federal No Child Left Behind Act (“NCLB”). The Progress Report is designed to supplement the State accountability system. A school’s NCLB status is an important basis for assessing the number and characteristics of students in a school who have attained the goal of proficiency in literacy and mathematics. NCLB Status is not incorporated into the Progress Report Grade.

In October 2010—during the Progress Report verification period—the school administration was presented with all of the data underlying the calculation of all Progress Report measures, including graduates’ diploma type, and had ample opportunity to review and update that data. The Graduation Rate and Regents diploma rate reflects that post-verification data.

Comments 9(c) and 12 discuss the successful leadership that the principal of Norman Thomas has shown. As described earlier in this document, the DOE takes into consideration multiple factors when it proposes a school for phase-out. This proposal is not a reflection of the principal’s efforts to improve the school. The DOE believes that Norman Thomas is not structured to dramatically improve student outcomes.

With regard to comments 13 and 14: The DOE’s central goal is to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school led by a dedicated leader with a vision for student success. To ensure that as many students as possible have access to the best possible education, since 2003 the DOE has replaced 91 of New York City’s lowest-performing schools with better options and opened 474 new

schools: 365 district schools and 109 public charter schools. As a result, we've created more high-quality choices for families.

Accountability is a central tenet of the DOE's approach to create high-quality school options for all students. The DOE strives to hold all schools, including those created in recent years, to the same high standards. When a school consistently fails to meet those standards, it is considered for interventions including phase-out.

Based on feedback from communities in 2009 and 2010, the DOE made improvements to its timeline and process for communicating with schools and families early and often throughout the investigation and decision making process. This year, we talked to school leadership, parents, SLTs, CECs, elected officials, and local CBOs about our ideas about how to improve struggling schools. We convened these meetings to discuss our proposals and to hear feedback and new ideas.

The Department developed and distributed Fact Sheets for each school we talked with. These Fact Sheets described proposals, the rationale behind them, included relevant data, and provided clear instructions for how to offer feedback. They were posted on our website and distributed at meetings.

When the Department's recommendations proposing to phase out schools were announced, dedicated teams of educators and engagement specialists spent several days back in these schools meeting with teachers, parents, and students.

In January 2011, Joint Public Hearings were held for all proposals and public feedback was collected at these meetings and through dedicated e-mail and phone numbers. The Department's analysis of public comment is contained in this document.

Changes Made to the Proposal

No changes have been made to this proposal as a result of public comment.