



Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Grade Truncation of P.S. 161 The Crown (17K161) From K-8 to K-5 Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

P.S. 161 The Crown (17K161, “P.S. 161”) is an existing school located in school building K161(“K161”), at 330 Crown Street, Brooklyn, NY 11225, in Community School District 17 that currently serves students in kindergarten through eighth grade. P.S. 161 serves kindergarten through fifth grade students in its zone, and it currently admits sixth grade students through a school-based application. It also offers one section of the District 17 Gifted and Talented program in kindergarten through fifth grade. The New York City Department of Education (“DOE”) is proposing to implement a “grade truncation” meaning that P.S. 161 would no longer serve sixth through eighth grade students and would only serve kindergarten through fifth grade students. P.S. 161 is the only school organization housed in K161.

This proposal to truncate P.S. 161’s grades is not expected to impact current sixth through eighth grade students enrolled at P.S. 161, with the possible exception of students who do not meet promotional requirements at the end of the proposed truncation. Also, this proposal will not affect the section of the Citywide Gifted and Talented program at P.S. 161. If this proposal is approved, P.S. 161 will gradually stop serving middle school students. At the end of the 2011-2012 school year, P.S. 161 will no longer enroll sixth grade students. All eighth grade students who meet promotional standards will apply to high school through the Citywide High School Admissions Process, and students in the sixth and seventh grades who meet promotional requirements will remain at the school for seventh and eighth grade, respectively. During the 2012-2013 school year, P.S. 161 will serve students in kindergarten through fifth grade and seventh and eighth grade. During the 2013-2014 school year, P.S. 161 will serve students in kindergarten through fifth grade and eighth grade. After the last class of eighth grade students graduates in June 2014, P.S. 161 will no longer serve any middle school grades.

At this time, there are no plans to co-locate any other organizations in K161. The DOE will continue to assess seat capacity and the needs in District 17 and across the borough to determine the most optimal use of the space that will be vacated by the proposed grade truncation of P.S. 161. Proposals for significant changes in building utilization will follow the process outlined in Chancellor’s Regulation A-190.

The details of this proposal have been released in an Educational Impact Statement (“EIS”) which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals>.

Copies of the EIS are also available in P.S. 161’s main office.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at K161 on January 19, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 134 members of the public attended the hearing and 16 people spoke. Present at the meeting were: the Chancellor’s Designee, Deputy Chancellor Marc Sternberg; District 17 Community Superintendent Buffie Simmons; District 17 Community Education Council (“CEC”) representative Cassandra Alston Townsley; Principal of P.S. 161, Michael Johnson; and P.S. 161 School Leadership Team (“SLT”) representatives Ronald Rivette and Demetrius Lawrence. New York State Senator Eric Adams, a representative of New York State Assembly Member Karim Camara, and a representative of New York City Council Member Letitia James also attended the hearing.

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

1. The CEC representative stated that the CEC opposed the proposal because P.S. 161 should have an opportunity to turn its middle school grades since its principal was recently appointed and the school has instituted programs like Saturday Academy that could help the school improve. The CEC representative also stated that truncating P.S. 161’s middle school grades after the deadline for middle school applications had passed is unfair.
2. An SLT representative expressed his opposition to the proposal and stated that:
 - a. P.S. 161 needs more resources to provide programs to students.
 - b. P.S. 161 has a new principal and some new staff and truncating the school’s middle school grades would not be a show of confidence for the principal.
 - c. If the truncation is implemented, how would the space be used?
3. An SLT representative expressed his opposition to the proposal and stated that:
 - a. P.S. 161’s parents also do not support the proposal.
 - b. Parents were not properly notified of the proposal and that they only found out about the proposal from news reports.
 - c. A significant amount of funding totaling \$700,000 was removed from P.S. 161 over three years, which deprived the school of needed resources.
 - d. Truncating the middle school grades would create inconvenience for P.S. 161 parents.
4. A representative of Assembly Member Karim Camara expressed opposition to the proposal and stated that truncating P.S. 161’s middle school grades and phasing out Middle School for the Arts (17K587) would leave I.S. 61 as the only middle school option available in the neighborhood. The representative also stated that P.S. 161’s current principal should have the opportunity to turn P.S. 161 around.

5. A representative of Council Member Letitia James expressed opposition to the proposal and stated that P.S. 161's parents support the school and more resources should be given to P.S. 161 so that it could grow and improve under its new leadership.
6. State Senator Eric Adams opposed the proposal and stated that:
 - a. The school should not be closed because the school's Parent Teacher Association is active.
 - b. P.S. 161 has not received sufficient resources in the past.
 - c. How would the space that would be made available by the truncation be used?
7. A representative of the Council of School Supervisors & Administrators president Ernest Logan expressed opposition to the proposal and stated that the schools that are targeted for phase-out and truncation generally have disproportionate numbers of poor and minority students.
8. A commenter opposed the proposal and stated that:
 - a. The parents were not properly notified of the decision to propose to truncate the school.
 - b. It is unclear what supports were provided to the school, specifically to help the school bolster its middle school grades' performance.
9. A commenter opposed the proposal and stated that truncating P.S.161's middle school grades would decrease its enrollment and resources provided to the school.
10. Multiple commenters opposed the proposal and stated that P.S. 161's current principal should have the opportunity to turn P.S. 161 around.
11. Multiple commenters opposed the proposal and asked how the space that would be made available by the truncation would be used if this proposal is approved.

The following questions were asked as part of the question and answer section of the Joint Public Hearing on January 19, 2012.

12. What supports were given to P.S. 161? Did the school's budget decline by over \$700,000 over the past three years?
13. Were the supports cited in the EIS specific to P.S. 161?
14. To what does the DOE attribute the decline of test scores at P.S. 161 and how does the proposed truncation address those issues?
15. When were parents notified that P.S. 161 was in danger of truncation?
16. Why is the recent appointment of a new principal to P.S. 161 not sufficient change?
17. What resources are being provided at other District 17 middle schools and why can they not be implemented here?
18. How will the space that would be made available by the proposed truncation be used?
19. With an excess of middle school seats in District 17, why should seats at P.S. 161 remain open when there are other District 17 middle schools that are better performing?
20. What district-wide initiatives are being implemented to assist struggling middle school students?

The DOE received comments at the Joint Public Hearings that did not directly relate to the proposal and therefore will not be addressed.

- A representative of the Council of School Supervisors & Administrators president Ernest Logan stated that phasing out schools and opening new schools is not an effective

strategy because the DOE has proposed this year to phase out schools that it recently opened.

- Have any proposals been rejected by the Panel for Educational Policy (“PEP”)?

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

21. Council Member James, Assembly Member Camara, and State Senator Adams submitted a letter to the Chancellor prior to the EIS’s publishing to express their opposition to the proposal and state that:
 - a. P.S. 161 has a new principal, and the school should be given an opportunity to improve its performance.
 - b. P.S. 161 has recently implemented an after school program and a Saturday academy in an effort to improve.
 - c. P.S. 161 should not be truncated because it has an engaged and dedicated Parent Teacher Association.

Class Size Matters (“CSM”), submitted written comments objecting to all of the proposed phase-outs and truncations proposed by the DOE. In opposing the DOE’s proposal to phase-out and eventually close these schools, the CSM comments cited the following reasons: (1) none of the Educational Impact Statements for the proposals include discussion of how the proposed phase-outs or, where applicable, the co-locations would affect class size; (2) the Citywide Instructional Footprint does not include class size standards; (3) the Educational Impact Statements use utilization figures from the DOE’s Blue Book, which does not take into account the need to reduce class sizes in schools Citywide; (4) the community members, faculty, and families of schools that have been proposed for phase-out have opposed the proposed phase-outs and truncations; (5) the schools that have been proposed for phase-out and/or truncation have high concentrations of “at-risk” students, as defined as English Language Learner students, students with disabilities, and economically disadvantaged students.

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

- Comments 1, 2(b), 4, 5, 10, 16, 21(a), and 21(b) contend that the current principal should have an opportunity to improve P.S. 161’s middle school grades’ performance. Comments 6(a) and 21(c) contend that P.S. 161 should not be closed because the school’s Parent Teacher Association is active. Comment 14 asks to what the DOE attributes the decline of test scores at P.S. 161 and how the proposed truncation would address those issues. Contrary to comment 6(a), the DOE has not proposed to phase out and close P.S. 161. Rather, the DOE has proposed to truncate P.S. 161’s middle school grades. The DOE recognizes that school leadership, while very important, is still only one component of a school. The school culture and conditions have not enabled increased student achievement. After a comprehensive review of P.S. 161 with the goal of determining what intensive supports and interventions would be best benefit the P.S. 161 community, the DOE concluded that truncating P.S. 161’s middle school grades would allow for the school to more fully focus on serving its kindergarten through fifth grade students. The decision to propose a grade truncation does not reflect an assessment by the DOE that

P.S. 161's newly appointed school leadership lacks the capacity to support P.S. 161. Rather, it reflects the DOE's assessment that P.S. 161 lacks the infrastructure to improve its work quickly to meet the needs of its sixth through eighth grade students and families.

- Comment 1 relates to the timing of the proposal and the middle school application deadline. Progress Reports for schools that serve students in kindergarten through eighth grade were released on September 23, 2011. The DOE held meetings with the Parent Teacher Association and the SLT on October 31, 2011, to discuss possible outcomes for P.S. 161 due to its continued performance. The DOE then incorporated community feedback in its comprehensive review of P.S. 161. The EIS outlining the proposed truncation of P.S. 161 was published on December 19, 2011 and the PEP is expected to vote on this proposal at its meeting on February 9, 2012. The 2011-2012 District 17 Middle School Directory was distributed to families in October 2011. The reason that the directory was distributed in October was so that middle school choice applications could be returned by December 16, 2011, the citywide deadline for middle school choice applications. The PEP could not have voted on the proposal before the deadline for middle school applications to be submitted.
- Comments 3(b), 8(a), and 15 relate to when parents were engaged about the proposal. Consistent with the DOE's approach in the 2010-2011 school year and its desire to incorporate school and community input in its decision-making process, meetings were held with schools that were eligible for an intensive support plan or intervention. In these conversations, representatives of the DOE shared information about the school's performance and talked with the community members about their reflections of the school's strengths and weaknesses. The then-District 17 Community Superintendent, Rhonda Hurdle-Taylor, met with P.S. 161's SLT, Parent Teacher Association, and faculty in three separate meetings held on October 13, 2011 to discuss possible outcomes for P.S. 161 due to its continued poor performance. Current District 17 Community Superintendent Buffie Simmons met with P.S. 161's parent community on December 12, 2011 to convey the decision to propose the truncation of P.S. 161's middle school grades and the EIS was published on December 19, 2011. A notice to parents and a letter to parents about the proposal and the scheduled joint public hearing were distributed on December 22, 2011 to students to take home.
- Comments 2(c), 6(c), 11, and 18 relate to the space that would be made available at K161 if the proposed truncation is approved and implemented. At this time, there are no plans to co-locate any other organizations in K161. The DOE will continue to assess seat capacity and the needs in District 17 and across the borough to determine the most optimal use of the space that will be vacated by the proposed grade truncation of P.S. 161. Proposals for significant changes in building utilization will follow the process outlined in Chancellor's Regulation A-190.
- Comments 2(a), 3(c), 5, 6(b), 8(b), 12, and 13 relate to the resources and supports that were made available to P.S. 161. Comments 3(c) and 12 contend specifically that P.S. 161's budget was reduced by over \$700,000 over the course of three years, which

negatively affected P.S. 161's instruction. Comments 17 and 20 relate to district-wide initiatives aimed at improving performance in District 17 middle schools.

There are no district-wide initiatives aimed at improving performance in District 17 middle schools. However, the DOE notes that all schools receive support and assistance from their respective superintendents and Children First Networks. The Children First Network is a team that delivers operational and instructional support directly to schools. Struggling schools receive supports as part of system-wide efforts to strengthen all schools and they also receive individualized supports to address their particular challenges. The DOE does everything it can to provide struggling schools with leadership, operational, instructional, and student supports that can help turn a struggling school around.

Struggling schools have targeted action plans developed by their networks. These plans identify concrete action steps, benchmarks, and year-end goals aimed at immediately improving student achievement. These plans outline the specific support the network will provide to the schools to address the most urgent areas of need. As stated in the EIS, the DOE offered numerous specific supports to P.S. 161 to help its efforts to improve performance. They included:

Leadership Support:

- Ongoing leadership training and mentoring for the principal and assistant principals to help them set clear goals for the school in developing the school's Comprehensive Education Plan, the Principal Performance Review, and Language Allocation Plan.
- Coaching and training to leadership on strengthening instructional quality through standards-based instruction, differentiated learning techniques, and improving the school culture and learning environment through targeted development.
- Coaching and training to leadership on implementing plans in support of Citywide instructional initiatives and teacher effectiveness.

Instructional Support:

- Support and training to teachers in creating curriculum maps, developing strategies aimed at addressing various students' entry points into content, and other instructional tools to enhance teacher practice and improve student achievement.
- Coaching to English Language Arts teachers in the development of literacy focused tasks, assessments, and curriculum.
- Professional development opportunities in supporting high- and low-level students through the implementation of differentiated instruction.
- Training to teacher teams in various data driven tools, supports, and measures aimed at improving student achievement through developing data-driven instruction and the analysis of best teaching practices.

Operational Support:

- Advising school staff on budgeting, human resources issues, teacher recruitment, and building management.

- Offers of leadership support and training in monitoring progress and meeting compliance regulations for English Language Learner students and students with disabilities.

Student Support:

- Training to the School Based Support Team in comprehensive guidance programs and evidence-based counseling strategies targeted at developing and improving the capacity for social and emotional supports at the school level.
- Development of extensive professional development opportunities for staff in an effort to improve school environment and school safety.

P.S. 161's enrollment declined from 2008-2009 to 2011-2012, which has impacted P.S. 161's budget. Regarding the claim that P.S. 161's budget was reduced by more than \$700,000 over three years, the DOE acknowledges that budget cuts have impacted schools across the City, but budget cuts have not disproportionately impacted schools that have been proposed for phase-out. In 2010-2011, individual school budgets Citywide were cut by an average of 4%. It should be noted that principals have discretion over their budget and make choices about how to prioritize their resources.

- Comments 3(d) and 4 relate to the impact that the proposed phase-out of Middle School for the Arts (17K587) and the proposed truncation of P.S. 161's middle school grades would have on the availability of middle school seats in District 17, and specifically, in the Crown Heights neighborhood. Middle School for the Arts is approximately 0.9 mile away from P.S. 161, and the Dr. Gladstone H. Atwell Middle School (17K061) is approximately 0.3 mile away from P.S. 161. In addition, two other middle schools, the School for Human Rights (17K531) and the School for Democracy and Leadership (17K533), are approximately 0.8 mile away from P.S. 161 and M.S. 2 (17K002) is approximately one mile away from P.S. 161. Thus, there are several middle schools within one mile or less from P.S. 161 that are available to P.S. 161's students if P.S. 161's middle school grades are truncated.
- Comment 3(a) states that P.S. 161's parents do not support the proposal.

The DOE recognizes that that members of the community may oppose this proposal. However, P.S. 161 has struggled to improve, and its recent performance confirms the DOE's assessment that the school lacks the capacity to improve its work quickly on behalf of students in sixth through eighth grade. In 2010-2011, only 30% of P.S. 161's sixth grade students, 14% of P.S. 161's seventh grade students, and 21% of P.S. 161's eighth grade students were performing on grade level in English. Only 18% of P.S. 161's sixth grade students, 28% of P.S. 161's seventh grade students, and 21% of P.S. 161's eighth grade students were performing on grade level in Math.

The DOE counts on each of its schools to provide a high-quality education to its students and it holds all schools to the same high standard. If a school is not getting the job done for students, the DOE is compelled to take serious action to ensure its students do not fall even further behind.

- Comment 7 contends that schools that have been targeted for phase-out generally have disproportionate numbers of poor and minority students. When the student demographics of the high schools that the DOE has phased out are compared with the demographics of the small schools that have been opened in their place, it becomes apparent that they are very similar in terms of the percentages of black and Latino students, English Language Learner students, and students with disabilities. While high schools that the DOE has phased out had 83% black or Latino students, 18% English Language Learner students, and 13% students with disabilities, the new replacement schools have 92% black or Latino students, 14% English Language Learner students, and 14% students with disabilities.

Specifically regarding P.S. 161, in 2010-2011, 86% of P.S. 161's students qualified for free or reduced lunch, and 88% of its students were black or Hispanic. Across District 17, the average percentage of students who qualified for free or reduced lunch was 80%, and the average percentage of black or Hispanic students was 96%. Thus, it is inaccurate to state that P.S. 161 has a disproportionate percentage of students who qualified for free or reduced lunch or were black or Hispanic.

- Comment 9 stated that truncating P.S. 161's middle school grades would decrease its enrollment and the resources provided to the school. As stated in the EIS, the DOE projects that P.S. 161's enrollment will decrease to 565-625 kindergarten through fifth grade students by the 2014-2015 school year when P.S. 161 has fully implemented its grade truncation. As most funding in school budgets is allocated on a per-pupil basis, the DOE anticipates that P.S. 161 would receive approximately \$4,412.45 less annual base funding for each middle school student no longer on the P.S. 161 roster after the truncation is completed. The DOE also notes that the total number of students enrolled at P.S. 161 is expected to decline, meaning that the school will need fewer teachers and fewer supplies to meet the needs of its smaller student population. In any case, funding will be provided in accordance with enrollment levels, allowing the school to meet the instructional needs of its student population. This is how funding is awarded to all schools throughout the City, with budgets naturally increasing or decreasing as enrollment fluctuates from year to year.
- Comment 19 supports the proposal and, thus, does not need to be addressed.

Class size is primarily determined by how principals choose to program students at their school within their budget. Thus, no particular proposal, in and of itself, necessarily impacts class size. The Citywide Instructional Footprint relies upon the current programming at a school (number of sections) to determine the baseline footprint allocation. Decisions to co-locate schools are not based solely on the utilization figures in the Blue Book. The DOE also considers the total number of classrooms in the building and the number of sections currently programmed at all schools in the building or projected to be programmed to determine the availability of excess space and the baseline footprint for each school.

The DOE acknowledges that there some members of the schools' communities that are opposed to the proposal, and/or prioritize smaller class sizes. However, given the schools' longstanding performance struggles, we believe that phasing out certain schools and/or creating new educational options by co-locating new schools will best serve the families in these communities.

With respect to CSM's comments regarding the particular types of students who attend phase-out schools, it should be noted that schools progress report grades are based in part on a comparison of the school with peer schools serving similar populations of students. Poor performance report grades thus indicate that a school is not serving its students well, both objectively and by comparison to other schools serving similar students. Moreover, the new schools proposed to open are anticipated to serve student populations similar to the phasing out school.

Changes Made to the Proposal

No changes have been made to this proposal.