



Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Grade Truncation of P.S. 298 Dr. Betty Shabazz (23K298)
From K-8 to K-5 Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to implement a “grade truncation” of the middle school grade levels of P.S. 298 Dr. Betty Shabazz (23K298, “P.S. 298”), located in building K298, at 85 Watkins Street, Brooklyn, NY 11212, in Community School District 23 that currently serves students in kindergarten through eighth grade. This means that P.S. 298 would no longer serve students in grades six through eight and would only serve students in kindergarten through fifth grade. P.S. 298 is currently the only school organization housed in K298.

P.S. 298 currently serves students in kindergarten through eighth grade. P.S. 298 also offers three sections of a full-day pre-kindergarten program. If this proposal is approved, P.S. 298 will no longer enroll sixth grade students after the 2011-2012 school year. All current eighth grade students who meet promotional standards will apply to high school through the Citywide High School Admissions Process and enter ninth grade, as planned, in September 2012. Students currently in the sixth and seventh grades at P.S. 298 will continue at the school for seventh and eighth grade, provided they meet promotional requirements.

During the 2012-2013 school year, P.S. 298 would serve students in kindergarten through fifth grade and seventh and eighth grade. During the 2013-2014 school year, P.S. 298 would serve students in kindergarten through fifth grade and eighth grade. After the last class of eighth grade students graduates in June 2014, P.S. 298 would no longer serve any middle school grades. Students who do not meet promotional requirements and must repeat a grade no longer offered by P.S. 298 would be provided with an alternative placement in a District 23 middle school.

All P.S. 298 fifth grade students would apply to start middle school in 2012-2013 as sixth grade students through the Middle School Choice Process.

In a separate Educational Impact Statement (“EIS”) posted in December 2011, the DOE has also proposed to open and “co-locate” a new middle school, (23K423, “23K423”) in K298, which would serve students in sixth through eighth grade when it reaches full scale in 2014-2015. This

new middle school would admit sixth grade students through the District 23 Middle School Choice Process with a limited unscreened admissions method. If the proposal to co-locate 23K423 in K298 is approved, it would provide a new middle school option for District 23 families and would replace the seats lost by the proposed grade truncation of P.S. 298's middle school grades. 23K423 would be co-located in K298 with P.S. 298 as it phases in.

The details of this proposal have been released in an 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. 298's main office.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at building K298 on January 20, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 63 members of the public attended the hearing and 10 people spoke. Present at the meeting were: the Chancellor's Designee, Deputy Chancellor Marc Sternberg; District 23 Community Superintendent Ainslie Cumberbatch; P.S. 298 School Leadership Team ("SLT") representative, Natasha Capers; and District 23 Community Education Council ("CEC") representative, Ianetta Jeffers.

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

1. The SLT representative opposed the proposal and stated that P.S. 298 should have an opportunity to turn its middle school grades around because P.S. 298's principal was recently appointed.
2. The CEC representative expressed that the CEC president supports the decision to not phase out P.S. 298 and to truncate P.S. 298's middle school grades.
3. A commenter asked what supports and resources will be provided to P.S. 298 as it implements the truncation.
4. Multiple commenters stated that P.S. 298 should have an opportunity to turn its middle school grades around.
5. Multiple commenters expressed their belief that the decision to truncate P.S. 298's middle school grades has already been made.
6. Multiple commenters stated that P.S. 298 has not received sufficient resources, citing that literacy and math coaches are no longer provided to the school, and the school does not have a dean. The commenters also cited that the school lacked resources such as a stocked library, a functioning photocopier, student laptops, and Smartboards.
7. A commenter asked how and when parents were notified about the proposal.

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

No written or oral comments regarding this proposal were received during the comment period.

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 Enrollment Capacity Utilization Report ("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 and 4 contend that the current principal should have an opportunity to improve P.S. 298's middle school grades' performance.

The DOE recognizes that leadership, while very important, is still only one component of a school. The school culture and conditions at P.S. 298 have not enabled increased student achievement. Additionally, no single factor determined whether P.S. 298 would be truncated. Nonetheless, as stated in the EIS, in 2010-2011, only 15% of students were performing on grade level in English, putting the school in the bottom 1% of K-8 schools Citywide. Only 21% of students were performing on grade level in Math, putting the school in the bottom 1% of K-8 schools Citywide in terms of Math proficiency.

In particular, P.S. 298's sixth through eighth grade students have struggled. In 2010-2011, only 13% of P.S. 298's sixth grade students, 6% of its seventh grade students, and 9% of its eighth grade students were performing on grade level in English. Only 22% of P.S. 298's sixth grade students, 20% of its seventh grade students, and 14% of its eighth grade students were performing on grade level in Math in 2010-2011. In 2009-2010, only 16% of P.S. 298's sixth grade students, 16% of its seventh grade students, and 15% of its eighth grade students performed on grade level in English. Only 16% of P.S. 298's sixth grade students, 16% of its seventh grade students, and 6% of its eighth grade students performed on grade level in Math.

In 2010-2011, P.S. 298 was not adequately helping students to make progress as demonstrated by the fact that P.S. 298 was in the bottom 7% of K-8 schools Citywide in terms of learning growth in English and the bottom 11% in terms of learning growth in Math. Learning growth measures annual student growth on New York State English Language Arts ("ELA") and Math tests relative to similar students. Thus, if these results persist, P.S. 298 students will fall further behind their peers in other schools.

After a comprehensive review of P.S. 298 with the goal of determining what intensive supports and interventions would be best benefit the P.S. 298 community, the DOE concluded that truncating P.S. 298'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. 298's newly appointed school leadership lacks the capacity to improve P.S. 298. Rather, it reflects the DOE's assessment that P.S. 298 lacks the infrastructure to improve its work quickly to meet the needs of its sixth through eighth grade students and families.

- Comment 2 supports the proposal and does not need to be addressed.
- Comment 3 relates to the supports and resources that, if the proposal is approved, will be provided to P.S. 298 as it implements its grade truncation.

P.S. 298 is supported by Children First Network 611 ("CFN"). The CFN 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. If the proposal to truncate P.S. 298 is approved, the CFN will work with P.S. 298's SLT to identify and plan for appropriate supports related to the evolving needs of the school.

- Comment 5 expresses the opinion that the decision to open a new middle school in K298 has already been made.

This is incorrect; the proposal is to be voted on by the Panel for Educational Policy at its meeting on February 9, 2012.

- Comment 6 relates to resources available to P.S. 298, such as literacy and math coaches, a school dean, a sufficiently stocked library, a functioning photocopier, student laptops, and Smartboards.

The DOE confirms that P.S. 298 currently has neither a literacy nor a math coach. However, P.S. 298 currently has a Teacher Center room and a full time Teacher Center Instructor. Additionally, P.S. 298's current assistant principals receive supports from CFN's Assistant Principal Institute, in which they receive support from CFN in teacher effectiveness, while two of P.S. 298's teacher leaders are currently being trained and supported by CFN on curriculum development and the inquiry team process. Also, Children First Network 611 has assigned its Deputy Director of Instruction as the lead instructional support contact to P.S. 298. Finally, CFN has provided supplemental support by assigning a Special Education Instructional Specialist to support P.S. 298's Integrated Co-Teaching classes by sharing best practices, developing, monitoring, and refining behavioral intervention plans, and providing professional development teachers to support at-risk students.

The DOE notes that P.S. 298 had a dean of students in the 2010-2011 school year, but the administration opted to hire a second assistant principal for the 2011-2012 school year instead. Currently, P.S. 298's two assistant principals are supporting student discipline and intervention at P.S. 298.

P.S. 298 and CFN are following up to ensure that the school's photocopier will be repaired.

Currently, three of P.S. 298's classrooms are equipped with a Smartboard, and P.S. 298 recently received four new LCD projectors for students. P.S. 298, like any other school Citywide, may also choose to raise additional funds, through grants or funds allocated by elected officials, to purchase various resources they feel would benefit their students (e.g., Smartboards, student laptops, etc).

- Comment 7 relates 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 District 23 Community Superintendent, Ainslie Cumberbatch, met with P.S. 298's SLT, Parent Teacher Association, and faculty in three separate meetings respectively on October 11, 2011 to discuss possible outcomes for P.S. 298 due to its continued poor performance. Mr. Cumberbatch met with P.S. 298's parent community on December 16, 2011 to convey the decisions to propose the truncation of P.S. 298's middle school grades and to open and co-locate 23K423 with P.S. 298 in K298 beginning in 2012-2013. The EISs for both proposals were 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.

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.