

Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Phase-out of P.S. 215 Lucretia Mott (27Q215) 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 phase out and close P.S. 215 Lucretia Mott (27Q215, “P.S. 215 ”), an existing elementary school located at 535 Briar Place, Far Rockaway, NY 11691, in Community School District 27, in building Q215 (“Q215”). P.S. 215 currently serves students in kindergarten through fifth grade and offers a pre-kindergarten program. The DOE is proposing to phase out and eventually close P.S. 215 based on its low performance and its inability to turn around quickly to better support student needs.

If this phase-out proposal is approved, P.S. 215 would no longer admit kindergarten students and would no longer offer grades one and two or its pre-kindergarten program after the conclusion of the 2011-2012 school year. Beginning in the 2012-2013 school year, after P.S. 215’s kindergarten, first grade, and second grade are phased out, P.S. 215 would serve one less grade in each subsequent year until it completes its phase-out and closes in June 2015. Current students in grades two, three, and four would continue to be served by P.S. 215 and be supported as they progress toward completion of elementary school at P.S. 215. Current students in kindergarten and first grade would be served in a new zoned elementary school, 27Q362 (“27Q362”), to be opened in Q215 and proposed in a separate Educational Impact Statement (“EIS”). A pre-kindergarten program would also be offered by 27Q362 in Q215 (pending continued availability of funding).

In a separate EIS posted on December 12, 2011 the DOE has proposed to co-locate a new zoned elementary school, 27Q362, which would serve students in kindergarten through fifth grade when it reaches full scale in Q215 in 2015-2016.¹ If the proposal to co-locate 27Q362 in Q215 is approved, it would provide a new zoned elementary school option for District 27 families and replace the seats lost by the proposed phase-out of P.S. 215. 27Q362 would be co-located in Q215 with P.S. 215 as it phases out. P.S. 215 is currently the only school located in Q215.

¹ A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at P.S. 215 on January 20, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 250 members of the public attended the hearing, and 23 people spoke. Present at the meeting were Chancellor Dennis Walcott; Community School District 27 Superintendent Michele Lloyd-Bey; District 27 Community Education Council President Coralanne Griffith-Hunte; CEC 27 members Gina Davis, Joshua Hirschman, Raymond McNamara and Jennifer McNamara; P.S. 215 Principal Susan Hofmann; P.S. 215 School Leadership Team members Donna Hamlet and Shyl Ley; Rebecca Rawlins and Drew Patterson from the Division of Portfolio Planning; Joseph Edwards representing Congressman Meeks; Paul Smyth representing State Senator Smith; and City Council member Sanders.

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

1. Dr. Coralanne Griffith-Hunte, CEC 27 President, stated that the CEC agreed with parents. She said it is easy for someone outside the community to give statistics, but they are looking through tunnel vision. She noted that:
 - a. P.S. 225 and Beach Channel High School had also been phased out. If the school is not working, the administration, the teachers, or the curriculum should be changed.
 - b. Children are not robots and they are being taught to pass state exams.
 - c. Parents are the most important stakeholders in their children's lives and need to be involved in the schools. Parents in the district believe their children will never go to Scholars' Academy or KAPPA because they are not receiving a quality elementary school education. Parents should be concerned as soon as a school gets a "C" on the progress report.
 - d. The school had been losing resources for years.
2. SLT member Donna Hamlet asked why the administration would remain in the building as the school phases out. She asked why the school would be replaced rather than just replacing the principal.
3. Dmytro Fedkowski, Queens borough representative on the Panel for Educational Policy, spoke of his appreciation for the teachers in the room. He said he would listen to the discussion at the hearing before making a decision about whether to support the proposal.
4. Several speakers noted that P.S. 215 had gone from receiving an "A" on its progress report to receiving an "F", attributing this decline in progress report grade to a decline in the resources provided to the school.
5. One commenter noted that of the schools currently proposed for phase-out, 11 of them were opened under the Bloomberg administration. She asserted that:
 - a. Students have been turned away from new schools because of their record of academic achievement and sent to low-performing schools.
 - b. Phase-out schools are often attended by children of color from economically disadvantaged communities.
 - c. The goal of the phase-out policy is to improve data by creating new schools that will not have their own data for several years.

6. Several commenters spoke in opposition to the proposal, stating that P.S. 215 needs to be provided with more resources to succeed.
7. Several commenters said that the school's administration, rather than teachers, needs to be fixed.
8. One commenter spoke in opposition to the DOE's policy of phasing out underperforming schools.
9. One commenter said that the teachers at P.S. 215 are phenomenal and the only thing that has changed in the school is the school's administration.
10. One P.S. 215 student spoke about the quality of the teachers at P.S. 215.
11. One commenter spoke in opposition to the proposal and in support of P.S. 215's principal and teachers.
12. Several commenters noted that class sizes at P.S. 215 had increased dramatically over the past several years. The commenter described several positions and programs that have been cut in recent years, stating that budget cuts have had a tremendously detrimental effect on the school and community.
13. One commenter asked why the DOE had taken so long to address performance issues at P.S. 215.
14. One commenter expressed opposition to turning P.S. 215 into a charter school.
 - a. He commented on the detrimental effect the proposal would have on the students left behind at P.S. 215 as it phases out.
 - b. He stated that the proposal had come suddenly, since it was only in November that the community was given a warning that the school needed to improve.
15. One commenter asked Chancellor Walcott why he had never visited P.S. 215 before.
16. One commenter asked about the advantages of phasing out and replacing a low-performing school, since several of the schools currently proposed for phase-out were opened under Mayor Bloomberg.
17. One commenter praised the school and noted that "every time something happens it's the minorities that take the back end." The commenter asked what the DOE would do if the school were closed.

The DOE received comments at the Joint Public Hearing which did not directly relate to the proposal.

18. One commenter detailed the challenges of being a teacher and spoke of his concern for his own school.
19. One commenter voiced his opposition to Mayor Bloomberg's education policies.

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

20. A teacher at P.S. 215 noted that despite the failing grades on the school's recent progress reports, teachers at the school are successful at making personal connections with the students. The commenter asked that P.S. 215 be given another chance to improve.
21. One commenter asserted the teachers at P.S. 215 need more support and a better chance for success. The commenter noted that:
 - a. The school has been operating with less and less support over the last five years. The school has not had a copying machine in eight years.

- b. The school's coaches are being used as cluster teachers with little time to provide coaching to teachers.
 - c. Class sizes have risen as programs have been cut.
 - d. The P.S. 215 community needs an organized administrator rather than a new school.
22. 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(d), 6, and 21(a) are all regarding the funding and resources provided to P.S. 215.

The DOE provides all schools, including P.S. 215, funding on a per-pupil basis. As described in the EIS, funding is 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. In addition, Fair Student Funding awards supplemental allocations on a per pupil basis to students who have additional needs and therefore cost more to educate. For example, during the 2011-2012 school year, elementary schools received additional funds per pupil for each English Language Learner enrolled. As with all other schools Citywide, P.S. 215 may receive additional "categorical" funding based on student characteristics and needs. For example, federal Title I funding is awarded to schools based on the proportion of low-income students they enroll and P.S. 215 is currently a Title I school. Assuming that the school continues to meet Title I criteria, the school's Title I funding award will adjust as the size of the school population changes. While schools do receive supplemental support for students with disabilities through FSF, that only represents part of the funding provided to support those students. Schools are budgeted to meet the needs of their students with disabilities as defined by their IEPs. Even as P.S. 215 is phased out, funding will continue to be provided to meet the needs of all students with disabilities in accordance with their IEPs.

Furthermore, in an effort to turn P.S. 215 around, the DOE has provided the school with numerous additional supports in the areas of school leadership, instruction, and operations including:

Leadership Support:

- Provided extensive leadership training and mentoring for the principal and assistant principals to help them set clear goals for the school while developing the school's Comprehensive Education Plan and Language Allocation Plan.
- Coached and trained leadership on implementing plans in support of Citywide instructional initiatives and teacher effectiveness.
- Trained and supported leadership in data systems and supporting structures to promote and help leaders use data to support instructional practices.

Instructional Support:

- Supported and trained teachers in creating curriculum maps, strategies aimed at addressing various students' entry points into content, and other instructional tools to raise teacher practice and improve student achievement.
- Facilitated training for teachers in assessment design and the creation of rigorous tasks and rubrics aligned to Citywide instructional initiatives.
- Worked with teacher teams to deepen practice around instruction and support for students with disabilities and English Language Learners.
- Coached teachers on the implementation of a literacy program focused on accelerating reading comprehension, vocabulary, writing proficiency, and performance.

Operational Support:

- Advised school staff on budgeting, human resources, teacher recruitment, and building management.
- Trained school staff on the use of data systems and Special Education compliance.
- Supported school staff with applications to a variety of grant opportunities.

Student Support:

- Trained 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.

Despite the availability of these supports, it is apparent that P.S. 215 has failed to develop the proper infrastructure to meet the needs of its students and families. Given the extent of these investments and the negligible improvements that resulted, the DOE does not believe that extra funding or resources are the appropriate approach to dramatically improving the school.

Comments 3, 9, 10, 11, 18, and 20 expressed support for the staff at P.S. 215.

With respect to these comments, the DOE recognizes that P.S. 215 has a committed staff that has worked hard to support its students. However, despite these attempts to help meet the needs of its students, along with the assistance provided by the DOE, P.S. 215 has not developed the culture and conditions to effectively support its students' instructional needs and therefore the DOE believes that phasing out the school is appropriate.

Comments 1(a), 2, 7, and 21(d) asked about changes to P.S. 215 leadership with regard to the phase-out decision.

For the majority of schools the DOE investigates, it sees hope that the school can turnaround, and so it may replace the principal, change staff, invest in new programs or mentor teachers, and sometimes reconfigure grades to help the school change trajectory. But, in some cases, the DOE is left with a set of schools that it knows – based on quantitative and qualitative data – do not have the ability to improve quickly; and a decision is made to propose to gradually phase out the school and give future students a better opportunity. Deciding what course of action can best support the students and community of a struggling school is not easy, but the DOE is compelled to act based on its commitment to ensuring that every student has access to high-quality schools.

Comment 1(c) advocates for greater parent involvement.

The DOE supports parent involvement in all aspects of their students' education. When families are involved in education, schools and students benefit. The DOE agrees with the speaker that all parents should get involved in their own child's education. There are also many school, district, and citywide leadership opportunities for parents who want to take on a greater role in the schools.

Comment 1(b) expresses concern that the children are being taught "for the tests".

The DOE encourages a model of differentiated and individualized instruction in which the pace of instruction is based on each individual child as a learner. Additionally, the Common Core State Standards include rigorous content and application of knowledge through high-order skills.

Comment 4 relates to the decline in Progress Report scores and indicates that P.S. 215 received an "A" in 2009-10. The commenters attribute performance declines to a lack of resources at P.S. 215.

In 2009 -2010, P.S. 215 received an overall "D" on its progress report. The school received a "C" in the area of progress, an "F" in the area of performance and a "C" in the area of school environment. In 2009-2010, P.S. 215 was in the bottom 4% Citywide in Math proficiency and in the bottom 3% in English proficiency. In 2008-2009, P.S. 215 received an overall "C" on its progress report. The school received a "C" in the area of progress, a "B" in the area of performance, and a "B" in the area of school environment. In 2008-2009, P.S. 215 was in the bottom 7% in Math proficiency Citywide and in the bottom 9% English proficiency Citywide. P.S. 215 is not adequately helping students make progress. Under the DOE's accountability framework, all schools that receive a "D" or "F", or a third consecutive grade of C or lower on their annual Progress Report and all schools that received a rating of "Underdeveloped" on their most recent Quality Review are evaluated for intensive support or intervention, including the possibility of phase-out.

In terms of resources at P.S. 215, all DOE district elementary schools including P.S. 215, are allocated funding on a per-pupil basis, Fair Student Funding (FSF), which covers basic instructional expenses and which can, at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs. P.S. 215 also receives additional categorical funding based on student characteristics and needs. This federal Title I funding is awarded to schools based on the proportion of low-income students they enroll.

Comments 12, 21 (b) and 21 (c) described increases to class sizes and reduced staff at P.S. 215.

The number of class sections at each school is determined by how the principals program their schools. This decision is based on enrollment, budget, and student needs. The DOE makes efforts to ensure that class sizes remain within the United Federation of Teachers contractual class sizes, which vary by grade level. Since funding in school budgets is allocated on a per-pupil basis, FSF covers basic instructional expenses and FSF funds may, at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs.

Comments 8 and 19 express opposition to the phase-out and do not agree with the phase-out policy, in general.

The DOE believes that based on the school's performance, only the gradual phase-out and replacement of P.S. 215 with a new zoned elementary school in Building Q215 will provide the community with better options. 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, under this Administration New York City has replaced 117 of our lowest-performing schools with better options and opened 535 new schools: 396 district schools and 139 public charter schools.

Comment 14 disagreed with a charter school opening at P.S.215.

The DOE has no intention to locate a charter school at P.S. 215. The DOE has proposed to co-locate a new zoned elementary school, 27Q362, which would serve students in kindergarten through fifth grade when it reaches full scale in building Q215 in 2015-2016.

Comment 14(a) expresses concern about the effects of this proposal on the students that remain in P.S. 215 during the phase-out.

As described in the EIS, P.S. 215 would continue offering all necessary classes to support current students as they work to meet promotional requirements. In addition, P.S. 215 will continue to receive support from a Children First Network team throughout the phase out process. This team will continue to provide instructional and operational support to the school administrators, teachers, and staff.

Comment 14(b) states that the proposal is sudden and the community was only recently informed.

The DOE's goal for every proposal is to engage communities well in advance of a PEP vote. In the case of P.S. 215, the DOE talked to school leadership, parents, the SLT, and local community representatives about its ideas. The DOE was very clear in these meetings that it had not settled on any proposals yet, and it was there to hear feedback and new ideas. The DOE integrated feedback

into its decision to propose P.S. 215 for phase-out. Deciding to phase out a school is the toughest decision the DOE makes, but it is the right thing to do for the students in some schools. In this case, the DOE continues to believe that the phase-out and replacement of P.S. 215 is the best course of action for the school, but this does not mean that the DOE has not carefully considered the community's feedback. Prior to issuing this proposal, the DOE sought and received feedback from the P.S. 215 community regarding strategies to better support students and improve outcomes at the school. Specifically, the DOE held meetings with the Parent Teacher Association ("PTA") on October 11, 2011 and the School Leadership Team ("SLT") on October 12, 2011, to discuss possible outcomes for P.S. 215 due to its continued poor performance. The DOE also solicited community feedback via telephone and e-mail, and created a dedicated website to provide information to the public.

Comments 13 and 15 questioned why Chancellor Walcott has never visited P.S. 215 before and why it took so long to address the performance issues at P.S. 215.

The Chancellor does not commit to visiting every NYC school. However, representatives of the Chancellor such as the superintendent and the Children First Network have made frequent visits to P.S. 215 and have supported the school over the last few years. These supports are detailed in the EIS on pages 3-4 and are noted above in the response to comments 1(d), 6, and 21(a). For example, the network has supported the school leadership in creating a plan that addressed areas for improvement identified in P.S. 215's Quality Review, provided instructional support by offering training to teachers on assessment design and individualized instruction, and assisted teachers teams to deepen practice around instruction and support for students with disabilities and English Language Learners.

Comments 5(a), 5(b), 5(c), 16, and 17 state that the school's performance was good until Mayor Bloomberg received mayoral control, and also suggest that phase-outs target minority communities and are unjust.

The DOE determines which interventions to apply to schools based on the performance of the school (including student progress and student demographics) over time. The specific ethnic make-up of P.S. 215 was not a factor in the DOE's decision to propose to phase out and replace P.S. 215. Schools are identified for possible phase-out for the following three reasons: (1) they received poor grades on their annual Progress Report; (2) they received a poor rating on their annual Quality Review; or (3) they have been identified by the New York State Education Department ("SED") as Persistently Low Achieving ("PLA"). Specifically, under the DOE's accountability framework, all schools that receive a D or F, or a third consecutive grade of C or lower on their annual Progress Report and all schools that received a rating of Underdeveloped on their most recent Quality Review are evaluated for intensive support or intervention, including the possibility of phase-out. After careful review of these factors, the DOE believes that the phase-out and replacement of P.S. 215 will best serve the school community.

With regard to comment 22, 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.