Department of Education
Dennis M. Walcott, Chancellor

Amended Public Comment Analysis

Date: February 9, 2012

Topic: The Proposed Truncation of the Middle School Grades of Frederick Douglass Academy IV Secondary School (16K393) Beginning in 2012-2013

Date of Panel Vote: February 9th, 2012

A copy of the Educational Impact Statement ("EIS") pertaining to this proposal can be found at the main office of Frederick Douglass Academy IV Secondary School, and online at the following website: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals

Summary of Proposal

The New York City Department of Education ("DOE") is proposing to truncate the middle school grades (six through eight) of Frederick Douglass Academy IV Secondary School (16K393, "Frederick Douglass Academy IV"), an existing secondary school located at 1010 Lafayette Avenue, Brooklyn, NY 11221 in Community School District 16, in Building K026 ("K026") because of its low performance and inability to turn around quickly to better support student needs. Frederick Douglass Academy IV currently serves students in sixth through twelfth grades. If this truncation proposal is approved, Frederick Douglass Academy IV would no longer admit sixth grade students after the conclusion of the 2011-2012 school year. One middle school grade at Frederick Douglass Academy IV will then be truncated in each subsequent year. Frederick Douglass Academy IV will no longer serve middle school students after June 2014. Current middle school students will continue to be served and supported by Frederick Douglass Academy IV as they progress toward completion of middle school. Current eighth grade students will be supported through the Citywide High School Admissions Process ("High School Admissions Process") as they select a high school, one choice for which is to remain at Frederick Douglass Academy IV.

Frederick Douglass Academy IV is currently "co-located" in building K026 with P.S. 026 Jesse Owens (16K026, "P.S. 026"), an existing zoned elementary school serving students in grades kindergarten through five. P.S. 026 also offers a pre-kindergarten program. A "co-location" means that two or more school organizations are located in the same building, and may share large, common spaces like the auditoriums, gymnasiums and cafeterias.

In a separate EIS posted on December 22, 2011, the DOE has also proposed to co-locate a new choice middle school, (16K681, "I.S. 681") in K026, which would serve students in sixth through eighth grades when it reaches full scale in 2014-2015. I.S. 681 would admit students through the Ditrict 16 Middle School Choice process using a limited unscreened selection method. This new middle school would provide another middle school option for District 16 families and would replace the seats lost by the truncation of the middle school grades of

Frederick Douglass Academy IV. I.S. 681 would be co-located in K026 with Frederick Douglass Academy IV and with P.S. 026.

This analysis of public comment has been amended to clarify the supports offered to schools.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at building K026 on January 30, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 140 members of the public attended the hearing, and approximately 21 members of the public spoke. Present at the meeting were Principal Elvin Crespo and Roland Robertson of the Frederick Douglass Academy IV School Leadership Team ("SLT"), Victoria Willis and Marta Torres of the P.S. 26 SLT and President Pegye Johnson of Community Education Council ("CEC") 16. Deputy Chancellor for Talent, Labor and Innovation David Weiner served as the Chancellor's Designee. Also present were Brooklyn High School Superintendent Karen Watts and Yvonne Soto, Carrie Marlin, Caitlin Tommasulo, Chris Casarez, Antonio Whitaker, and Toby Shepherd from the Department of Education.

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

1. Roland Robertson, the United Federation of Teachers ("UFT") chapter chair at Frederick Douglass Academy IV, made the following statements:
    a. The school has undergone leadership crises with multiple principals over a three year period.
    b. Teachers have not been observed or been given the necessary tools for development.
    c. The current principal was hired on an interim basis and in turn hired an assistant principal on an interim basis. Both of their emphases have been on the high school, not the middle school.
    d. The school is so short staffed that teachers have to be in the cafeteria on a daily basis, giving up their prep and lunch periods to ensure a safe school environment.
    e. The school has received little to no help from its Children First Network ("CFN").
    f. The DOE should support the existing school instead of supporting the proposal to truncate and replace the middle school grades of Frederick Douglass Academy IV.

2. Martha Torres, the co-president of the Parent Teacher Association of P.S. 026 Jesse Owens, made the following statements:
    a. The co-location with Frederick Douglass Academy IV has been difficult and P.S. 026 has to ensure that its students are physically separated throughout the day from Frederick Douglass Academy IV's students.

b. Students at P.S. 026 have been privy to behaviors that elementary school students should not see, including violence in the cafeteria.

3. Bill Meehan, a field director for the Council of Supervisors and Administrators ("CSA"), made the following statements:
    a. Eleven of the schools being proposed for phase-out were opened under the Bloomberg administration.
    b. The DOE has withheld or never bothered to provide support for those schools the DOE is now proposing to phase-out.
    c. The DOE should rescind the prospect of closing schools and consider for the first time the needs of schools, teachers, and parents.

4. A commenter stated that:
    a. The school needs more resources and more activities for students.
    b. Keeping the school open will help students get to college and be successful.
    c. The reason the DOE should not phase out the school is because students have the ability to be successful.
    d. Students at the school want the school to remain open and will work to respect the environment and keep it nice and clean.

5. A commenter stated that:
    a. The coursework and guidance he received from teachers at Frederick Douglass Academy IV made him able to gain entry to Brooklyn Technical High School.
    b. The school does not have the proper resources and has not received the proper guidance and the DOE should provide these supports instead of phasing out the school.

6. A commenter stated that:
    a. The DOE is pushing out P.S. 026 in addition to Frederick Douglass Academy IV.
    b. The kids are the ones who have been failed and she is here for the kids.

7. A commenter stated that:
    a. It feels like children at P.S. 026 are being punished for the failures of Frederick Douglass Academy IV and the DOE.
    b. Adding more students to the building will make classes overcrowded.
    c. Why was P.S. 026 not given the option of expanding instead of bringing in a new school?
    d. If the cost of a student at P.S. 026 is more important to the DOE than safety or education, then the DOE has failed.

8. City councilmember Al Van made the following statements and read the following comments aloud from a letter submitted to the DOE:
    a. He is very discouraged that the DOE has failed to understand that schools are community institutions, not simply buildings.
    b. The proposal to truncate Frederick Douglass Academy IV's middle school grades is based on the performance struggles of the last three years, but the DOE is aware of and responsible for the turmoil that was created during those three years.
    c. In the Summer of 2008, a special education teacher made allegations that the school was not providing adequate resources for special education students. The teacher was retaliated against and sent to a "rubber room." The DOE claimed that the allegations were baseless, however, the New York State Education Department confirmed the alleged deficiencies. Problems continued after the principal and his successor both resigned.
    d. There has been a lack of stable leadership at Frederick Douglass Academy IV provided by the DOE. It has been reported that the school lacks books, educational materials, and after school programs. The DOE's only response was to pledge to monitor the school more closely.
    e. The DOE should do the right thing for the students, the school, parents, and the community by reconsidering this proposal.

9. A commenter stated that he received an excellent education at Frederick Douglass Academy IV and is now on a full scholarship to Brandeis University.

10. The UFT representative for District 16 stated that:
    a. The DOE's policy of phasing out and replacing schools is wrong headed.
    b. The DOE did not provide support to Frederick Douglass Academy IV when the school was struggling.
    c. The DOE does not want community input and this is evidenced by the fact that the DOE has already hired a principal for a new school designed to replace the middle school grades Frederick Douglass Academy IV.

11. A commenter stated that:
    a. She does not want to see Frederick Douglass Academy IV be shut down or turned into a charter school.
    b. She believes the school can change from an "F" school to an "A" school.
    c. Frederick Douglass Academy IV needs better computers and a better learning environment where everyone respects each other.
    d. The DOE should provide students at Frederick Douglass Academy IV with opportunities such as study hall, paid jobs at the school and opportunities to help teachers during class.

12. A commenter stated that:
    a. Students at the school do not want the school to be shut down.
    b. Parents and guardians cannot afford private school and do not wish to enroll in charter school lotteries.
    c. Students at Frederick Douglass Academy IV want to learn, but teachers need to be stricter and more understanding.
    d. The school needs more after school programs.
    e. Shutting down the school will not make anything better.

13. The UFT special representative assigned to Frederick Douglass Academy IV stated that:
    a. The DOE has given no support to Frederick Douglass Academy IV.
    b. The school did not have any books or supplies.
    c. The school started each year with multiple teaching vacancies.
    d. The DOE neglected the school, so how dare the DOE now propose to truncate it?
    e. Actions that the DOE claims to have taken on behalf of the school took place in the last year under the direction of the principal, so what specific actions did the DOE take in prior years?
    f. Actions that the DOE claims to have taken on behalf of the school are all lies.

14. A commenter stated that:
    a. Frederick Douglass Academy IV is a struggling school that needs to be kept open.
    b. The DOE needs to provide Frederick Douglass Academy IV with effective leadership and also needs to prioritize the needs and the community.

15. A commenter stated that:
    a. All children have already been affected by having Frederick Douglass Academy IV in the building.
    b. Students at P.S. 026 no longer have access to the library, the gymnasium or the science room because Frederick Douglass Academy IV uses these spaces.
    c. Frederick Douglass Academy IV needs its own building. When schools are crowded, it sends the message that children are not important.

16. A commenter stated that it makes no sense for an elementary school to share space with a middle and high school, but now that these schools are sharing space the DOE needs to do a better job supporting the schools that are co-located.

17. A teacher at Frederick Douglass Academy IV stated that:
    a. The school has slid from the top because of a lack of resources, support and effective leadership.

b. Teachers at Frederick Douglass Academy IV have worked diligently and exhausted all their efforts.
c. The DOE should intervene and give the support and resources that Frederick Douglass Academy IV needs.

18. A commenter stated that the DOE has failed the community, the children, and the school by not providing the support necessary for success.

19. A commenter stated that:
    a. It is not fair to parents, students or anyone in the community for the DOE to shut down schools to which the DOE chose not to give support.
    b. While he cannot tell the DOE how to do its job, he can tell the DOE that it is not doing its job right.

20. A commenter stated that he remembers his time at Frederick Douglass Academy IV being peaceful, that he received a lot of education and knowledge from Frederick Douglass Academy IV, and that it is outrageous and mind-blowing that this could happen.

21. A commenter stated that he is now in the Marine corps, that he is attending college full time on a scholarship, and that he would like to see what the school could achieve with adequate support, funding, and leadership.

22. A commenter stated that:
    a. When her child received a report card most of the classes had dashes, not grades, because the classes lacked resources.
    b. Her son has to call a friend to do homework together because of a lack of books at the school.
    c. How can the DOE point the finger at Frederick Douglass Academy IV when the DOE is to blame?
    d. For the DOE to close Frederick Douglass Academy IV would be shameful. Instead, the DOE should use whatever money it has to help fix the school.

23. A representative from the Citywide Council on High Schools stated that:
    a. The proposal to phase out and replace Frederick Douglass Academy IV is wrong on many levels, but is wrong primarily because it continues the program of closing schools as opposed to supporting, growing and aiding schools.
    b. How much community opposition does the DOE need to hear before the DOE will withdraw a proposal?
    c. Children deserve a school that is built up, not closed down.

d. The school has had upheaval at the helm.
e. The school has seen an increase of students with special education classifications of nearly 200% and an increase of students who are over-age and under-accredited. This indicates that the school has more children who need special help and a second chance.

Additionally, a number of questions were submitted in writing to DOE at the Joint Public Hearing:

24. What supports were given to this school in the last three years to help the school succeed?
25. Some students at Frederick Douglass Academy IV are respectful and maintain good grades. It is the disrespectful students who make our school an "F" school.

A number of questions or comments received at the Joint Public Hearing, including the following, were not directly relevant to this proposal:

26. There is a final judgment and in the end, you will have to answer for all the decisions you've made in your life.
27. It is hard to explain to his children why they must walk through a metal detector on their way into school in the morning, and why a gun was found at Frederick Douglass Academy IV.
28. A commenter stated that he is downright disgusted by what is going on in politics.
29. A commenter stated that students of color in particular have been failed by the DOE.

In addition to collecting feedback at the Joint Public Hearing referenced above, the DOE solicited feedback on this proposal via email, telephone and an online feedback form.

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

30. City councilmember Al Vann submitted a letter to the DOE which consisted of the remarks read aloud at the Joint Public Hearing.

31. 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 26-29 are not directly related to the proposal and therefore do not require a response.

Comments 1(a), 8(d), 14(b), 17(a), and 23(d) relate to leadership changes at Frederick Douglass Academy IV.

The DOE acknowledges that Frederick Douglass Academy IV has had a high rate of principal turnover in the last three years. However, the DOE holds all of its schools to the same high standards in a concerted effort to ensure that all students have access to high-quality school programs. If a school cannot meet those standards, the DOE will consider all possible interventions, as outlined above, including phase-out.

Comments 1(b-f,) 3(b, c), 4(a), 5(b), 8(d), 10(b), 11(c, d), 12(c, d), 13(a-d), 17(a, c), 18, 19(a), 21, 22(a-d), 23(a, d), and 24 argue that Frederick Douglass Academy IV has not received the support it needs to be successful, including support with staffing, professional development, technical assistance, and financial resources.

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 multiple 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 strives to provide struggling schools with leadership, operational, instructional, and student supports that can help turn a struggling school around. Schools take advantage of those supports they believe will best improve student performance.

Schools proposed for phase out will also receive individualized supports in the future. Like all struggling schools, phase out schools will have targeted action plans developed by their Children First Network. These plans will identify concrete action steps, benchmarks, and year-end goals aimed at immediately improving student achievement. This plan will outline the specific support the network will provide to the school to address the most urgent areas of need, and may include: leadership coaching; professional development on instructional strategies for struggling students; identifying grants aimed at specific needs of the school; introducing new programs; supporting the development of a smaller learning environment; and staff and/or leadership changes.

As noted in the EIS related to this proposal, the DOE offered numerous specific supports to Frederick Douglass Academy IV to help its efforts to improve performance, including:

Leadership Support:

- Providing 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.

- Coaching and training leadership on implementing plans in support of citywide instructional initiatives.

- Supporting leadership and staff in generating meaningful strategies for improving the quality of classroom visitations, instructional feedback, and teacher reflections, as a way to raise teacher practice and improve student outcomes.

Instructional Support:

- Supporting and training teachers in instructional improvement strategies related to English Language Learner students and interventions available to increase achievement.

- Supporting the school in assessment design, curriculum mapping, and student feedback tools aimed at meeting the necessary standards and expected student outcomes.

- Training for staff on successful ways to increase student outcomes through data analysis and various tools to understand student progress.

Operational Support:

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

- Supporting school staff on developing strategies and practices for improving student attendance and creating strategies for targeting attendance concerns.

- Supporting school staff on improving the learning environment and deepening a culture of academic rigor through school-wide protocols and procedures.

Student Support:

- Training 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.

- Facilitating student transcript and attendance analysis as a way to improve academic, structural, and organizational supports offered to students.

- Supporting the school in developing and maintaining relationships with various organizations including Teen Action, a Department of Youth Community Development (DYCD) program aimed at increasing civic engagement.

Given the lack of success at Frederick Douglass Academy IV's middle school – despite the centralized effort to support all schools or the individualized plans for Frederick Douglass

Academy IV– it is apparent that Frederick Douglass Academy IV has failed to develop the proper infrastructure to meet the needs of its middle school students and families. As such, the DOE believes that drastic action, the truncation of the school's middle grades, must be taken.

Comments 2(a, b), 6(a), 7(a-d), 15(a-c) and 16 relate to the co-location of Frederick Douglass Academy IV and P.S. 026 and the possible impact of the proposed truncation and replacement of Frederick Douglass Academy IV's middle school grades on current and future students at P.S. 026.

As noted in the EISs accompanying this proposal, the DOE does not anticipate that enrollment policies, academic programs, extracurricular activities, or partnerships at P.S. 026 will be affected by this proposal.

If both this proposal and the proposal to open I.S. 681 are both approved, space allocations for P.S. 026, Frederick Douglass Academy IV, and I.S. 681 will continue to meet the DOE's standards for elementary, middle and high school organizations as described in the DOE's Citywide Instructional Footprint.

Moreover, I.S. 681 is projected to enroll new students at approximately the same rate that Frederick Douglass Academy IV is projected to articulate students out through the processing of truncating one grade per year. The table below, included in the EIS accompanying this proposal, displays enrollment at each school organization, total building enrollment, and total building utilization over the course of the proposed truncation and replacement of Frederick Douglass Academy IV's middle school grades and the phase-in of I.S. 681.

School Name	2010-2011 Audited Register	2011-2012 Enrollment	2012-2013 Projected Enrollment	2013-2014 Projected Enrollment	2014-2015 Projected Enrollment
Frederick Douglass Academy IV	451	445	345 - 405	290 - 340	250 - 290
I.S. 681	-	-	85 - 95	170 - 190	255 - 285
P.S. 026	348	307	283 - 343	278 - 338	278 - 338
Total Building Enrollment	799	752	713 - 843	738 - 868	783 - 913
Utilization	67%	63%	60% - 71%	62% - 73%	66% - 77%

Comments 3(a), 4(b-d), 5(a), 6(b), 8(a, b, e), 9, 10(a), 11(a, b), 12(a, b, e), 14(a), 17(b), 19(b), 20, 23(c, e) and 25 challenge the DOE's strategy of phasing out and replacing low performing schools generally, or challenge the DOE's determination that Frederick Douglass Academy IV specifically is a school in need of truncation.

The DOE is committed to providing a portfolio of high quality school options to students and families. A part of that strategy involves identifying the city's lowest performing schools and determining whether they can turn around quickly to better serve their student population. For those schools that the DOE determines lack the capacity to turn around quickly to better serve their student population, the DOE recommends the most serious intervention: gradually phasing-out overtime by no longer enrolling new students. As all schools are held to high standards for student achievement, schools recommended for phase-out or truncation may include new schools that have been opened under the Bloomberg administration.

Frederick Douglass Academy IV is a school that the DOE has determined warrants this intervention. As noted in the EIS proposing to truncate the middle school grades of Frederick Douglass Academy IV:

- The majority of middle school students at Frederick Douglass Academy IV remain below grade level in English and Math. Last year, only 22% of students were performing on grade level in English and only 32% of students were performing on grade level in Math – putting the school in the bottom 37% of middle schools Citywide in terms of English proficiency and in the bottom 23% in terms of Math proficiency.

- Frederick Douglass Academy IV is not adequately helping middle school students to make progress. The school is in the bottom 3% of middle schools Citywide in terms of learning growth in English, and the bottom 6% in terms of learning growth in Math. Learning growth measures annual student growth on State English Language Arts and Math tests relative to similar students. If these outcomes persist, Frederick Douglass Academy IV middle school students will fall further behind their peers in other schools.

- The Progress Report measures the progress and performance of students in a school as well as the school environment, compared to other schools serving similar student populations. Frederick Douglass Academy IV middle school earned an overall F grade on its 2010-11 annual Progress Report, including an F grade for Student Progress, a D grade for Student Performance, and a C grade for School Environment. Its overall score put it in the bottom 1% among middle schools Citywide.

- Safety issues have been a concern at the school. On the 2011 New York City School Survey, only 45% of teacher respondents agreed that discipline and order were maintained at Frederick Douglass Academy IV. Only 77% of student respondents agreed that they felt safe at Frederick Douglass Academy IV.

- Demand for Frederick Douglass Academy IV's middle school has declined steadily over the several years. Student enrollment has declined 28% since 2006-2007, suggesting that families are seeking better options.[1]

For these reasons, the DOE is confident that truncating the middle school grades of Frederick Douglass Academy IV over time is the right intervention for students and families in District 16.

Comment 10(c) and 23(b) pertains to the process of engaging the community regarding the proposed truncation and replacement of Frederick Douglass Academy IV's middle school grades.

The DOE is committed to engaging with the community, including its elected representatives, for all proposals that require a significant change in school utilization, as detailed in Chancellor's Regulation A-190. Prior to this Joint Public Hearing, the DOE held "early-engagement" meetings with Frederick Douglass Academy IV Secondary School staff and families. Additionally, the DOE has solicited feedback regarding this proposal via a dedicated phone line, a dedicated email address and a dedicated online feedback form. The DOE will continue to engage the community at every possible point regarding this and other proposals for the 2012-2013 school year.

The DOE's Office of New Schools works year-round to develop pipeline of potential school leaders in anticipation of various school leader vacancies. If the proposals to truncate and replace the middle school grades of Frederick Douglass Academy IV are approved, a proposed new leader would be hired via Chancellor's Regulation C-30, which governs the selection, assignment and appointment of principals and assistant principals.

Comments 13(e, f) pertain to specific supports that have been offered to Frederick Douglass Academy IV in the past, including supports that were offered prior to the last academic school year.

The supports that the DOE has provided to Frederick Douglass Academy IV listed in the EIS and in this analysis of public commentary are supports that have been provided over the course of the last three years.

Comment 8(c) pertains to a specific personnel issue regarding a special education teacher at Frederick Douglass Academy IV.

The DOE cannot comment specifically on individual personnel matters. Allegations of serious employee misconduct such as those referenced in this comment are investigated and responded to in a timely and appropriate manner. The DOE will work with Frederick Douglass Academy IV to ensure that the school continues to provide mandated supports to students with IEPs as the school phases-out.

[1] Demand data compares 2006-2007 audited register with the 2011-2012 unaudited register as of October 31, 2011.

Comment 31 concerns class size.

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

In response to public feedback, the following changes to the proposal were made:

- No changes have been made.