

### **Public Comment Analysis**

Date: March 19, 2013

Topic: The Proposed Grade Truncation of P.S. 156 Laurelton (29Q156) from a K-8 School to a K-5 School Beginning in 2013-2014

Date of Panel Vote: March 20, 2013

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### **Summary of Proposal**

The New York City Department of Education (“DOE”) is proposing to implement a “grade truncation” of the middle school grades of P.S. 156 Laurelton (29Q156, “P.S. 156”). P.S. 156 currently serves students in kindergarten through eighth grade, and is located in building Q156 and its adjacent transportable classroom unit (“TCU”) Q957 at 229-02 137 Avenue, Queens, NY 11413, in Community School District 29. If this proposal is approved, P.S. 156 would no longer serve students in grades six through eight and would only serve students in kindergarten through fifth grade. P.S. 156 is currently the only school organization housed in Q156.<sup>1</sup> The DOE is proposing to truncate P.S. 156 based on its poor performance and the DOE’s assessment that the school lacks the capacity to improve quickly to better support student needs. In a separate Educational Impact Statement (“EIS”) also posted on January 22, 2013, the DOE is proposing to open and co-locate<sup>2</sup> a new middle school, 29Q289, in building Q156. That proposal can be found here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar202013Proposals.htm>.

If this proposal is approved, P.S. 156 will no longer enroll sixth-grade students after the conclusion of the 2012-2013 school year, will no longer serve seventh-grade students following the 2013-2014 school year, and will no longer serve eighth-grade students following the 2014-2015 school year. In 2015-2016 and beyond, it will continue serving students in kindergarten through fifth grade. Current students in grades six through eight will be served and supported by the DOE as they progress towards the completion of middle school while remaining enrolled at P.S. 156. Current and future P.S. 156 eighth-grade students will be supported through the Citywide High School Admissions Process as they apply to a high school. In cases where students do not meet promotional requirements and must repeat a grade no longer offered by P.S. 156, they will be served in 29Q289.

P.S. 156 is a zoned elementary school that currently admits kindergarten through fifth-grade students in its zone. It also serves sixth- through eighth-grade students, and gives priority for admission to continuing fifth-grade students. A student’s zoned school is determined by his or her home address. If this proposal is approved and P.S. 156 no longer serves middle school grades, P.S. 156 will continue to admit kindergarten through fifth-grade students in its zone. All P.S. 156 fifth-grade students will enroll in their zoned middle school in 2013-2014 as sixth-grade students or apply to one of the district, borough-wide, or Citywide middle school options. As an additional option, current fifth-grade students at P.S. 156 will have priority to enroll at new school 29Q289 in building Q156 for the 2013-2014 school year only, should the proposal to open that school be approved.

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<sup>1</sup> All references to Q156 refer to both Q156 and TCU Q957.

<sup>2</sup> 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.

In a separate proposal described in another EIS, the DOE is proposing to open and “co-locate” a new middle school, 29Q289, in building Q156 in September 2013. The proposal can be found at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar202013Proposals.htm>. If the proposal to co-locate 29Q289 in Q156 is approved, it would provide a new middle school option for District 29 families and would replace seats lost by the proposed grade truncation of P.S. 156’s middle school grades. The new school 29Q289 would open with sixth grade for the 2013-2014 school year, adding one grade annually until it reaches full scale in the 2015-2016 school year, with a grade span of six through eight.

The details of this proposal have been released in an EIS which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar202013Proposals.htm>. Copies of the EIS are also available in P.S. 156’s main office.

### **Summary of Comments Received**

A joint public hearing regarding this proposal was held at building Q156 on February 28, 2013. Members of the School Leadership Team (“SLT”) from P.S. 156 were invited to participate and confirmed their availability to attend. At that hearing, interested parties had an opportunity to provide input on the proposal. While representatives from the Community Education Council, Citywide Council for Special Education and Citywide Council for English Language Learners were invited, they did not choose to participate in the hearing. Approximately 61 members of the public attended the hearing and 9 people spoke. Present at the meeting were: Deputy Chancellor Shael Polakow-Suransky; Facilitator Greg Betheil; Community Education Council (“CEC”) 29 Member Cherly Rochelle; Noreen Little, Principal of P.S. 156; SLT Representative Kimberly Esteva; SLT Representative Beverly Dobson; Council of School Supervisors and Administrators (“CSA”) Representative Dorothy Morris; United Federation of Teachers (“UFT”) Representative Jennifer Williams; and Allen Miller and Savita Iyengar from the Division of Portfolio Planning.

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

1. CEC 29 Member Cherly Rochelle expressed CEC 29’s support for the proposed truncation and co-location proposals.
  - a. Ms. Rochelle stated that having two schools will help better engage students, parents and staff.
2. P.S. 156 Principal Noreen Little expressed her support for the proposed truncation and co-location proposals.
  - a. Principal Little thanked the DOE for re-considering phase-out and using a truncation proposal instead.
  - b. Principal Little acknowledged the struggles of the 6-8 portion of P.S. 156 and stated that the truncation would allow the school to focus more on its K-5 program.
  - c. Principal Little thanked the DOE and larger community for their consideration of the proposal and asked that everyone continue to work together.
3. SLT Member Beverly Dobson expressed her support for the proposed truncation and co-location proposals.
  - a. Ms. Dobson stated that proposed truncation and co-location was a better intervention than phase-out.

- b. Ms. Dobson said that the P.S. 156 staff is willing to work with the new school.
4. United Federation of Teachers Representative Jennifer Williams expressed her support for the proposed truncation and co-location proposals.
  - a. Representative Williams said that staff is much more committed now with truncation as opposed to phase out. Representatives Williams encouraged the staff to remain committed.
  - b. Representative Williams asked whether the Department of Education would provide P.S. 156 with more resources.
5. CSA Representative Dorothy Morris expressed her support for the proposed truncation and co-location proposals.
  - a. Representative Morris congratulated the P.S. 156 faculty, staff and community on not being phased-out. She expressed her support for truncation—while not ideal, she believes it is a much better solution.
  - b. Representative Morris further stated that the Department of Education’s phase-out policy is a terrible policy and they are glad it did not occur at P.S. 156.
6. SLT Member Kimberly Esteva expressed her support for the proposed truncation, but opposition to the proposed co-location of a new middle school in Q156.
  - a. Ms. Esteva acknowledged that the middle school portion of Q156 needs to be removed due to safety issues and low performance.
  - b. Ms. Esteva argued that co-location is not the right not the answer because she believes the new school will have more money and more resources which will harm the elementary school students.
7. One commenter asked whether P.S. 156 would have support from the Department of Education during and after the truncation process.
8. One commenter stated that P.S. 156 needed more money for its teachers.
9. A commenter asked how this proposal would impact current students.
10. A commenter asked how the DOE defines “low performing.”

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

The DOE received no written and/or oral comments through its dedicated phone line and e-mail for the proposal.

**The DOE received a number of comments which do not directly relate to the proposal. Those comments are summarized below.**

11. A commenter asked if the DOE can consider a pre-Kindergarten program for Q156.

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

Comments 1(a), 2(a-c), 3(a-b), 4(a), 5(a) and 6(a) are in favor of the proposal and do not require a response.

Comments 4(b), 6(b), and 8 relate to the allocation of resources to both P.S. 156 and the proposed new school 29Q289 and whether there will be any disparity in resource allocation.

In New York City, we fund schools through a per pupil allocation. That is, funding “follows” the students and is weighted based on students’ grade level and need (incoming proficiency level and special education/ELL/Title I status). If a school’s population declines, the school’s budget decreases proportionally—just as a school with an increase in students receives more money. Even if the Department of Education had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls.

Fair Student Funding (FSF) dollars – approximately \$5.0 billion in the 2012-2013 school year based on projected registers – are used by all district schools to cover basic instructional needs and are allocated to each school based on the number and need-level of students enrolled at that school. All money allocated through FSF can be used at the principals’ discretion, such as hiring staff, purchasing supplies and materials, or implementing instructional programs. As the total number of students enrolled changes, the overall budget will increase or decrease accordingly, allowing the school to meet the instructional needs of its student population. In addition to the FSF student-need based dollars a school receives, all schools receive a fixed lump sum of \$225,000 in FSF foundation and \$50,000 in Children First Network Support to cover administrative costs.

New schools receive Fair Student Funding in the same manner as other schools. Funding follows the students and is based on pupil academic needs (i.e., special education, ELL, poverty, and/or proficiency status).

New district schools are provided with a fixed per-school allocation and a variable per-pupil Other Than Personal Services (“OTPS”) allocation of funds to cover start-up costs such as supplies and textbooks that may be required. This Other than Personal Services for new schools funding allocation is based on a fixed per-school amount, and a per-pupil allocation. Based on current one-time allocations for new schools, 29Q289 will receive a fixed allocation of \$80,000 and approximately \$42,085-\$46,515 in new school OTPS start-up per-pupil allocations during its first year. Thereafter, the school will receive \$100 per-student in OTPS based on projected registers for the newly added grade. In the case where there is no new grade phasing-in, the school will not receive an allocation in that year.

Principals have discretion over their budget and make choices about how to prioritize their resources. New schools may choose to hire fewer administrative staff (e.g. only a single assistant principal) freeing up dollars to be directed toward other priorities.

Comment 7 questions whether the Department of Education will support P.S. 156 during and after the truncation process.

All schools receive support and assistance from their superintendent and their [Children First Network](#), 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. We do everything we can to offer struggling schools leadership, operational, instructional, and student supports that can help turn a struggling school around.

We have had enormous success around the City replacing our lowest-performing schools with new schools that do better. We owe it to our families to give them the best possible options, and in some cases that means truncating schools or replacing low-performing schools with new ones.

Comment 9 relates to the impact of the proposed truncation and co-location on current students.

P.S. 156 currently serves students in kindergarten through eighth grade. If this proposal is approved, P.S. 156 will gradually stop serving middle school students in sixth through eighth grades and will no longer admit new sixth-grade students after the end of the 2012-2013 school year. Current sixth- and seventh-grade students will be supported at P.S. 156 as they progress towards completion of middle school and transition to high school. Current eighth-grade students who meet promotional requirements will apply to high schools through the Citywide High School Admissions process.

If this proposal is approved, in the 2013-2014 school year, P.S. 156 will only serve students in kindergarten through fifth grade and seventh and eighth grades. During the 2014-2015 school year, P.S. 156 will only serve students in kindergarten through fifth grade and eighth grade. After the last class of eighth-grade students is promoted in June 2015, P.S. 156 will no longer serve any middle school grades.

In each of those years, there may be students who do not meet promotional standards and are required to repeat a grade that the school will no longer serve. These students will be enrolled in 29Q289 in the grade which the student is repeating.

The sixth-, seventh-, and eighth- grade seats lost as a result of P.S. 156's truncation will be replaced by 29Q289 and by the existing capacity at the other District 29 middle schools.

Fifth-grade students at P.S. 156 are currently given priority to continue at P.S. 156 for sixth through eighth grade. If this proposal is approved, all current P.S. 156 fifth-grade students would apply to middle school and those who meet promotional requirements would start middle school in 2013-2014 as sixth-grade students. All P.S. 156 fifth-grade students would enroll in their zoned middle school in 2013-2014 as sixth-grade students or would apply to one of the district, borough-wide or Citywide middle school options. No fifth-grade students would be able to enroll in P.S. 156 for middle school.

29Q289 will serve students in sixth through eighth grade and will admit students through the middle school application process administered by the Office of Student Enrollment. As an additional option for the 2013-2014 school year, current fifth-grade students at P.S. 156 will have priority to enroll at new school 29Q289 in building Q156, should the proposal to open that school be approved. For the 2014-2015 school year and beyond, fifth-grade students at P.S. 156 will no longer have priority to enroll at 29Q289. If a P.S. 156 fifth-grade student does not meet promotional standards at the conclusion of a school year, then the student will be retained at P.S. 156 as in the past.

P.S. 156 fifth-grade students with Individualized Educational Programs ("IEPs"), with the exception of those recommending placement in a District 75 school, are admitted to schools in the same manner as general education students. Schools will create programs that meet the needs of all students, ensuring students with IEPs access to learn alongside their non-disabled peers to the greatest extent possible.

In accordance with DOE policy, English Language Learner ("ELL") students are admitted to schools in the same manner as their non-ELL peers. Thus, ELL students are placed according to the same placement criteria as their English-speaking peers.

Comment 10 concerns the definition of a “low-performing” school.

In a concerted effort to ensure that all students have access to high-quality school programs, the Department of Education annually reviews the performance of all schools citywide. This process identifies schools that are having the most trouble serving their students. Using a wide range of data and on-the-ground information, we identify our most struggling schools for intensive support or intervention.

First, we compile a preliminary set of schools that meet one or more of the following criteria:

- Received a grade of D, F, or a third consecutive C or worse on the 2011-12 Progress Report; and/or
- Received a rating on the most recent Quality Review of Developing or Underdeveloped; and/or
- Identified as Priority (bottom 5% in the state) by the New York State Education Department; and/or
- Received a recommendation on their 2011-12 Joint Intervention Team review for significant change in organizational structure or phase out/closure.

Next, we apply additional criteria to determine which schools are most in need of support or intervention. We remove from consideration schools that meet any of the following criteria:

- Elementary and middle schools that have a higher English Language Arts and Math average proficiency than their district average or the city average (whichever is lower). The city average for 2011-12 is 53.5% proficient; and/or
- High Schools that have a higher graduation rate than the citywide graduation rate. The citywide rate for 2010-11\* is 65.5%; and/or
- Schools that received an A or B on the 2011-12 Progress Report; and/or
- Schools that earned a Well Developed score on a 2010-11 or 2011-12 Quality Review; and/or
- Schools receiving a Progress Report Grade for the first time in 2011-12.

*\*Note: 2011-12 citywide graduation rate is not available yet.*

Schools that are removed from consideration for the most intensive support or intervention will receive differentiated support from their network team, but are not considered for phase-out.

We identify the remaining schools as struggling schools. These schools will undergo strategic action planning. 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, including:

- 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
- Possible leadership change.

Some of the struggling schools were also further investigated for more serious interventions that may include phase out/truncation and replacement. When considering whether a struggling school should be investigated as a candidate for more serious intervention – phase-out/closure/truncation – we consider a few key data points:

- Student performance trends over time;
- Demand/enrollment trends over time;
- Interventions already underway (e.g. SIG model);
- Talent data;
- School culture / environment;
- District needs / priorities; and
- School safety data.

In addition to our investigation, we also had conversations with school staff, parents, students, communities, and networks to get a holistic sense of what is happening at the school and what supports or interventions would most likely improve student outcomes. In our early engagement meetings at these schools, we had conversations with constituents about what is working and what isn't before making a decision about the supports or interventions that can best support student outcomes.

At the end of this multi-step process, our analysis and engagement directed us to a set of schools that quantitative and qualitative indicators show do not have the capacity to significantly improve. Deciding what course of action can best support the students and community of a struggling school is not easy, but we are compelled to act based on our commitment to ensuring that every student has access to high-quality schools.

Comments 5(b) and 11 do not directly relate to the proposal and do not require a response.

### **Changes Made to the Proposal**

No changes were made to the proposal.