Department of Education
Cathleen P. Black, Chancellor

Public Comment Analysis

Date: February 2, 2011

Topic: The Proposed Phase-out of P.S. 332 Charles H. Houston (23K332)

Date of Panel Vote: February 3, 2011

Summary of Proposal

P.S. 332 Charles H. Houston (23K332, "P.S. 332") is a zoned elementary school located at 51 Christopher Avenue, Brooklyn, NY 11212, in Community School District 23, in Building K332 ("K332"). It currently serves students in Kindergarten through eighth grade and offers a full-day Universal Pre-Kindergarten program. An Alternative Learning Center (K992, "Alternative Learning Center") is also located at K332. The New York City Department of Education ("DOE") is proposing to phase out and eventually close P.S. 332 based on its poor performance and the DOE's assessment that the school lacks capacity to turn around quickly to better support student needs.

If the proposal to phase out P.S. 332 is approved, P.S. 332 would no longer admit Kindergarten students or offer first, second, and sixth grades after the conclusion of the 2010-2011 school year. It would also not offer the Universal Pre-Kindergarten program after the conclusion of the 2010-2011 school year. Current students in second, third, and fourth grades would continue to be served by P.S. 332 as they progress toward completion of elementary school at P.S. 332.

Students in fifth grade would participate in the District 23 Middle School Choice Process consistent with current practice. Current fifth graders will also be guaranteed a seat at Mott Hall Bridges Middle School (23K671, "Mott Hall Bridges"), an existing middle school that is currently in the process of phasing in and is located less than one mile from P.S. 332 at 210 Chester Street, Brooklyn, NY 11212.

Current sixth- and seventh-grade students will continue to be served by P.S. 332 and will be supported as they progress toward completion of middle school. Consistent with current practice, current students in eighth grade will be supported in using the High School Admissions Process to select a high school.

In 2009-2010, K332 had a target capacity of 964 students, and the building enrolled 479 students, with a Pre-Kindergarten section of 18 students, yielding a target building utilization rate of 52%. By 2012-2013, the ALC at K332 will be re-sited to an alternate location within District 23 or where there is a district need for an additional ALC.

In a separate Educational Impact Statement ("EIS") also posted on December 20, 2010, the DOE will propose to open a new zoned elementary school, P.S. 401, in K332 to serve students in Kindergarten through fifth grade when fully phased in. The seats lost by the phase-out of P.S. 332 would be recovered through the phase-in of the new zoned elementary school, P.S. 401. In the same proposal, the DOE is also proposing to re-site and co-locate an existing charter school, Leadership Preparatory Ocean Hill Charter School (84K775, "Ocean Hill"), which would serve Kindergarten through eighth grade students when it reaches full scale in K332 in 2017-2018. This charter school would give preference to students in District 23. The EIS was amended on January 26, 2011 to correct typographical errors and formatting, update certain past strategic improvement efforts, clarify projected enrollment ranges, and replace redundant paragraphs. Copies of the EIS were available in the main office of the P.S. 260, and available online:
http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Feb32011Proposals

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at P.S. 332 Charles H. Houston on January 31, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 120 members of the public attended the hearing, and 20 people spoke. Present at the meeting were District 23 Superintendent Ainslie Cumberbatch; P.S. 332 School Leadership Team (SLT) representative Nigel Henty; District 23 Community Education Council President Charles Erwin, Junior.

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

1. The Community Education Council representative commented that he believes it is a bad decision to close the school, that the current principal has not been given the opportunity to prove herself and her leadership to turn P.S. 332 around. He stated that the City was aware of the failure of P.S. 332 years ago and should have removed that principal, rather than making an unfair decision about the current principal. He encouraged parents to make a difference and to voice their opinion. He does not believe that shutting down a school is the right solution, and encouraged parents to send a message to the Chancellor that this is unacceptable. He encouraged parents to save the school because children's futures are at stake, to stop staying at home and watch television.
2. The SLT representative read from a resolution that opposed the phase out of P.S. 332 for the following reasons:
    a. P.S. 332 students outperform students in 50 other citywide school, and P.S. 332 students show more promise.
    b. He commented that the DOE has failed to support the school.
    c. From January to June 2010 there was no principal and the assistant principals were not prepared for challenges.
    d. DOE planned poorly by sending P.S. 332 large numbers of student with Individual Education Plans (IEPs
    e. DOE did not provide appropriate resources since the lab program and academic intervention services were cut.
    f. DOE was aware of safety concerns at the school but did not provide resources for additional counseling or outreach to address the needs of homeless students, and failed to provide workshops for parents.

g. The DOE is not bothered by declining student enrollment at charters, and P.S. 332 does not have declining enrollment.
h. P.S. 332's Progress Report does not does not take into account student needs and lifestyle challenges (e.g. high numbers of homeless students).
i. The P.S. 332 community has worked together to create an action plan to save the school, strengthened student government and participation in the SLT, met with community leaders and submitted proposals for funding and technology innovation; fostered partnerships with many groups to create services and programs for students.
j. The DOE should reform the Progress Reports and school assignment policies;.
k. The DOE should provide resources for after school and Saturday programs; provide appropriate services for high need students.

3. Multiple commenters voiced concern related to the large number of students with IEP, and large number of homeless students at P.S. 332.
4. Multiple commenters voiced concern that the DOE did not support parents or students or provide the community with workshops.
5. A commenter voiced concern that P.S. 332 does not have an after school program for test preparation.
6. A commenter stated that the DOE is giving money to the charter schools, but not giving any money to P.S. 332, and that P.S. 332 would be more successful if it had received everything that the charter schools received.. She called on the DOE to give P.S. 332 more funds.
7. A commenter noted that the principal of P.S. 332 had sporadic attendance and that she never returned from winter break, and the school was left to function on its own.

The DOE received the following comments at the Joint Public Hearing which did not directly relate to the proposal and therefore do not require a response

8. One commenter advertised a rally on Saturday at 1368 Fulton street in front of Tweed courthouse.
9. Multiple commenters reminded the audience about the Panel for Education Policy meeting on February 3, and a rally from 4:30 -5:30pm.

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

10. One commenter questioned why the DOE does not work with Principals, Teachers, parents , students and the community rather than close schools.
11. One commenter inquired whether the DOE is giving up on children, and stated that there is no after school program in place for test preparation.
12. One commenter challenged the DOE Progress Report data cited in the EIS, stated that a large number of schools were not provided with adequate resources to address the large number of students with Individual Education Plans (IEPs), cited the loss of the Reading Lab program and Academic Intervention Services, criticized the safety supports and lack of resources provided to the school, and lack of workshops offered to families, and cited the previous principal's absence from the school from January 2010-June 2010, and challenged the enrollment decline cited in the EIS.

13. The DOE received a comment concerning all phase-out proposals calling for a moratorium on school closings, which stated that the DOE is the servant of the people and is not acknowledging the community's opposition to these proposals. The commenter suggested a facilitated discussion process which would work towards consensus.

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

- Comments 1, 2a, and 12 relate to the DOE's decision to propose the phase out of P.S. 332 and the decisions leading to that assessment. Last winter, the Panel for Educational Policy voted to gradually phase out P.S. 332 based on evidence that the school was not equipped to significantly improve student performance. A lawsuit prevented the DOE from following through with those plans. P.S. 332's performance during the 2009-2010 school year only confirmed the DOE's earlier assessment that the school lacks the capacity to turn around quickly to better support student needs. In 2009-2010, only 21% of P.S. 332 students were performing on grade level in math, putting P.S. 332 in the bottom 2% of all K-8 schools in New York City. That same year, only 25% of P.S. 332 students were on grade level in English, putting P.S. 332 in the bottom 20% of K-8 schools citywide. In 2008-2009, P.S. 332 was in the bottom 3% in citywide math proficiency and in the bottom 9% in English proficiency. In 2007-2008, P.S. 332 was in the bottom 5% in citywide math proficiency and in the bottom 19% for citywide English proficiency. P.S. 332 students have not shown any signs of growth over the last three years. In 2009-2010, P.S. 332 was in the bottom 5% of K-8 schools in learning growth in math. In 2008-2009 they were in the bottom 26% and bottom 1% in terms of making one year growth in English and math respectively. If these conditions persist, P.S. 332 students will continue falling further behind their peers in other schools. P.S. 332 earned an F grade on its 2009-2010 Progress Report, including a D grade in the School Environment sub-section and F grades in the Student Performance and Student Progress sub-sections. On all three of its previous Progress Reports, P.S. 332 earned C grades. These academic performance trends, indicate that P.S. 332 students will only fall behind their peers in other schools, and only the most serious intervention, the gradual phase-out and eventual closure of P.S. 332 will address the school's longstanding struggles and allow for new school options to develop in K332 that will better serve future students and the broader community.

- Comment 1 questioned whether the current principal had been given a fair chance. The former principal of P.S. 332, Deborah Pierce, served as the Principal of P.S. 332 for 12 years and recently retired on November 1, 2010. A new principal has not been formerly appointed to the position, rather there is an interim acting principal, Mickisha Goss currently at P.S. 332 As stated previously, based on the schools' academic performance trends, it has been determined that the gradual phase-out and eventual closure of P.S. 332 will address the school's longstanding struggles.

- Comments 2d, 2j, and 12 suggest that the Progress Reports do not take into consideration the diverse needs of the student enrollment as related to IEPs or transient students. The

Progress Report grade include three main areas of measurement: (I) School Environment, (II) Student Performance, and (III) Student Progress. Particular weight is given to Student Progress and to each school's performance in relation to peer schools. The Student Progress measure focuses on the capacities students develop as a result of attending the school, not the capacities they bring with them on the first day. Schools can also earn additional credit in the Exemplary Student Outcomes category. Schools earn points here when their high-need students achieve exemplary outcomes. This component of the score can only improve a school's overall Progress Report Score. It cannot lower a school's score. Additionally, schools are compared to all schools Citywide and to schools with student populations most like their own. Elementary and K-8 schools are ranked by a "peer index," which is the weighted average of the percentage of students at the school eligible for free lunch (the Title I Free Lunch rate) (30%), percentage of Black/Hispanic students (30%), percentage of the student population with Individual Education Plans (30%), and percentage of the student population made up of English Language Learners (10%). This creates a single score that can range from 0%-100%. Schools are judged based on how their students' performance compares to that of students in their peer schools. An elementary school or middle school's peer group consists of the twenty schools above and twenty schools below it in the same school type category when ranked by peer index. A K-8 school's peer group consists of the fifteen schools above it and fifteen schools below it in the same school type category when ranked by peer index.

- Comment 2i suggests that P.S. 332 has taken steps to improve the school. We recognize that P.S. 332 staff members and SLT have worked hard to improve the school. Despite their efforts, the school has not developed the proper infrastructure to meet the needs of its students and families.

- Comment 2g and 12 also suggests that P.S. 332 does not show declining enrollment. In 2010-2011, the school enrolls 392 students in kindergarten through eighth grade. In 2009-2010, the school enrolled 480 students in kindergarten through eighth grade. In 2008-2009, the school enrolled 538 students in kindergarten through eighth grade. In 2007-2008, the school enrolled 479 students. Therefore, enrollment is declining.

- Comments 2b, 2e, 2f, 2k,4 and 12 suggest that P.S. 332 was not properly supported. Contrary to that suggestion, the DOE has offered considerable support to P.S. 332 which included:

Leadership Support:

- Connecting administrators with other schools to learn effective practices that could be replicated at P.S. 332.

Instructional Support:

- Providing extensive professional development to the principal and assistant principals in the new state curriculum, Read Aloud, Shared Reading, Guided Reading, Writing Process, Everyday and Impact Math, Looking at Student Work, Elmore Instructional Rounds, and how to use the Quality Review to improve student outcomes.

- Establishing teacher teams that meet weekly and review student work to inform instructional practices.
- Providing ongoing training to teachers on how to individualize instruction and best use data.
- Arranging in-school math and literacy teacher coaches to serve as content experts.

Operational Support:

- Helping P.S. 332 best use grant funds from the American Recovery & Reinvestment Act (ARRA), Connect with Kids, 21st Century, School Quality 39, Title I, and Correct 91.
- Coaching staff on budgeting, human resources, recruiting and retaining talented teachers, and compliance issues.

Student Support:

- Exploring current CBO relationships and future partnerships with community-based organizations within the school community. Assigning an attendance teacher to P.S. 332 to develop long-term improvement plans for student attendance.
- Support in implementing Parents' Night, Learning Leaders programs, and parent workshops to encourage parent involvement.

Safety Support:

- Offered to provide Best Practices Standards for Creating and Sustaining a Safe and Supportive School resource guide.
- Offered to review and monitor school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and New York Police Department).
- Offered to provide technical assistance when incidents occur via the Borough Safety Directors.
- Offered to provide professional development and support to Children's First Network Safety Liaisons.
- Offered to provide professional development and kits for Building Response Teams.
- Offered to monitor and certify School Safety Plans annually.

- Comment 5 , 9 and 12 suggest that P.S. 332 does not offer after school test preparation programs and notes that programs previously offered are no longer offered at the school. School administrators determine which extracurricular programs are offered at their respective schools based on student interests and available resources. All schools modify extracurricular offerings annually based on student demand and available resources.

- Comment 6 suggests that P.S. 332 has not received adequate funding. Like all other DOE district elementary schools, funding for P.S. 332 is allocated on a per-pupil basis Fair Student Funding (FSF) which covers basic instructional expenses and , at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs. FSF also awards supplemental allocations on a per pupil basis to students who have additional needs and therefore cost more to educate. As with all other schools citywide, P.S. 332 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. P.S. 332 is currently a Title I

school. Additionally, the DOE recognizes that for this school year, we cut individual school budgets by an average of 4%. We worked hard to be fair to schools, so they all share a similar burden. Some schools budgets may have been reduced by more than an average of 4%, but, as we've made clear, no school is enduring a budget cut of more than an average of 4%. It's important to understand that any school that has a larger reduction also has a much smaller student population this year compared to last year—and doesn't need as much money to educate its students. In New York City public schools, funding follows the students. If a school's population declines from 2,500 to 2,100 students, the school's budget decreases proportionally—just as a school with an increase in students receives more money. Even if we had a budget surplus, a school with declining student enrollment would have received fewer resources for the coming school year.

- Comment 7 and 12 mentions that during the 2009-2010 school year, Principal Pierce was absent from school from January 2010 through June 2010. This is true. Principal Pierce underwent surgery which prevented her from working during that time. The Assistant Principal at the time, Debora Williams, oversaw the school during that time.

- Comment 8 suggests that the DOE has not worked with the community prior to proposing the phase out of P.S. 332. The DOE appreciates all feedback from the community regarding this proposal. Prior to the decision to propose phase-out of P.S. 260, the DOE consulted with superintendents and other experienced educators who have worked closely with the school and held community meetings with parents and school staff to solicit feedback. Based on this comprehensive review and evidence that additional supports were not working, the DOE believes that only the most serious intervention—the gradual phase- out and eventual closure of the school —will address its longstanding performance struggles and allow for new school options to develop that will better serve future students and the broader community. Additionally, over the past months, we've talked to school leadership, parents, SLTs, CECs, and local CBOs about our ideas and to explain the DOE's rational on why the school was struggling and to understand what supports had been put in place at the school, and to receive feedback.. We integrated much of this valuable feedback into our decisions, helping shape both our decisions on which schools to propose for phase-out and which schools to use different supports for. Over the course of several days, we went through extensive notification efforts, making sure that each school community, including parents, teachers, community groups, local officials and students themselves are aware of our proposal. . The DOE distributed Fact Sheets about the proposal, and these were also made available on our Web site. In addition, the DOE set up a dedicated website and voicemail to collect feedback on this proposal. Joint public hearings were held to solicit further feedback. All public comments made at the joint public hearings have been incorporated in this analysis.

- Comment 9 suggests that the DOE is giving up on children. This is inaccurate. The DOE recognizes that if the conditions described above persist, P.S. 332 students will continue falling further behind their peers in other schools. P.S. 332 earned an F grade on its 2009-2010 Progress Report, including a D grade in the School Environment sub-section and F grades in the Student Performance and Student Progress sub-sections. On all three of its

previous Progress Reports, P.S. 332 earned C grades. These academic performance trends, indicate that P.S. 332 students will only fall behind their peers in other schools if the school is not closed. In fact, rather than giving up on students, the DOE is creating new options for students.

- With respect to comment 13, the central goal of the Children First reforms is to create a system of great schools. 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, since 2003 New York City has replaced 91 of our lowest-performing schools with better options and opened 474 new schools: 365 district schools and 109 public charter schools. As a result, we've created more high-quality choices for families.

  Based on feedback from communities in 2009 and 2010, the DOE made improvements to its timeline and process for communicating with schools and families early and often throughout the investigation and decision making process. This year, we talked to school leadership, parents, SLTs, CECs, elected officials, and local CBOs about our ideas about how to improve struggling schools. We convened these meetings to discuss our proposals and to hear feedback and new ideas.

  The Department developed and distributed "Fact Sheets" for each school we talked with. These fact sheets described proposals, the rationale behind them, included relevant data, and provided clear instructions for how to offer feedback. They were posted on our website and distributed at meetings.

  When we announced the Department's recommendation to propose the school for phase out, dedicated teams of educators and engagement specialists spent several days back in these schools meeting with teachers, parents, and students.

  In January, Joint Public Hearings were held for all proposals and public feedback was collected at these meetings and through dedicated email and phone numbers. The Department's analysis of public comment is contained in this document.

Changes Made to the Proposal

No changes have been made to this proposal as a result of public comment.