



Public Comment Analysis

Date: January 31, 2011

Topic: The Proposed Grade Truncation of P.S. 40 Samuel Huntington (28Q040) to a K-5 School at the Conclusion of the 2010-2011 School Year

Date of Panel Vote: February 1, 2011

Summary of Proposal

P.S. 40 Samuel Huntington (28Q040, “P.S. 40”) is an existing elementary school located at 109-20 Union Hall Street, Jamaica, NY 11433, in Community School District 28. It currently serves students in kindergarten through sixth grade and offers a pre-kindergarten program. This is a proposal to implement a “grade truncation,” meaning that P.S. 40 would no longer enroll sixth graders after the current 2010-2011 school year.

Under this proposal, at the close of the 2010-2011 school year, all fifth and sixth graders who meet promotional standards would graduate from P.S. 40. In September 2011, these students would enter middle school as sixth and seventh graders, respectively. Beginning in 2011-2012, P.S. 40 would serve students only in kindergarten through fifth grade and continue to offer a pre-kindergarten program. From that time forward, P.S. 40 students would participate in the Middle School Choice Process during fifth grade and move on to middle school for sixth grade.

Middle schools typically enroll students beginning in sixth grade, and P.S. 40 students have the option to apply to start middle school as sixth graders. With the adoption of district-wide Middle School Choice, P.S. 40 students who wait until sixth grade to apply to middle school are limited to those schools that still have available seventh-grade seats. In particular, there are several unzoned, choice middle schools in District 28, and those schools rarely have open seventh-grade seats, which become available only if sixth graders leave the school. As a result, students who remain at P.S. 40 through sixth grade will have fewer options than their peers who start middle school a year earlier.

Additionally, P.S. 40 students who start middle school in seventh grade may face transitional challenges related to entering middle school a year later than most of their classmates, and they remain in their new middle school for only two years before again transitioning to high school. This proposed grade truncation will help standardize middle school application and entry grades in District 28, giving all P.S. 40 students access to the same range of middle school options as their peers throughout the District.

Furthermore, after conducting a comprehensive review of P.S. 40 with the goal of determining what intensive supports and interventions would best benefit its students and the community, the

Department of Education determined that truncating P.S. 40's sixth grade will allow the school to focus on elementary level instructional needs, thereby enabling P.S. 40 to better serve students.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at P.S. 40 Samuel Huntington School on January 19, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 33 members of the public attended the hearing, and five people offered comments on the proposal. Present at the meeting were District 28 Superintendent Beverly Ffolkes-Bryant; P.S. 40 Principal Alison Branker; P.S. 40 Assistant Principals Christina Williams and Ativia Sandusky; and P.S. 40 School Leadership Team ("SLT") representatives Gloria Mowring, Lisa Smith, Sharon Hicks, Theresa Hogan, Yvette Joseph, and Estrella Caban. Community Education Council 28 ("CEC 28") was invited to the hearing and confirmed that at least one member would attend. However, no CEC 28 members were present at the hearing and CEC 28 did not provide the DOE with advance notice that they would not attend the hearing.

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

1. SLT representative Estrella Caban commented that even though she was against the truncation proposal at first, she realized, after gathering detailed information, that the students will benefit from the truncation and expressed her support.
2. A commenter asked when the final decision would be made about the proposal.
3. Two commenters stated their concern that the truncation of sixth grade was based on the standardized test results and thought that the low scores on exams shouldn't result in the elimination of the sixth grade.
4. Two commenters expressed their concern that the truncation would have a negative effect on current fifth graders who will go onto middle school the following year.

Summary of Comments Received Prior to the Official Public Comment Period

Certain comments were received during meetings with parents and community members prior to the comment period on this proposal. Although these comments were not received during the comment period, as a courtesy, the DOE wishes to acknowledge that four written comments were received which expressed support for the school, stating that the school's problems mainly come from its administration. The DOE also received a letter from P.S. 40 Principal Alison Branker that analyzed data regarding the school to demonstrate that the school is not struggling and instead making progress and compares P.S. 40 performance with other schools in District 28 and in P.S. 40's peer group. The letter also highlighted enrichment programs and activities that have been held in the 2010-2011 school year. Comments similar to these are addressed in the analysis of public comment, specifically responses to comments 3 and 5.

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

5. A commenter said that the truncation would eliminate a testing grade and make next year's data seem as if the school has improved. The commenter felt that a leadership change is the best intervention for the school.

6. 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

Comment 1 is in overall support of the proposal and does not require a response.

In response to Comment 2 concerning the date of the vote for this proposal, the proposal will be voted on by the Panel for Educational Policy ("PEP") on February 1, 2011.

Comment 3 refers to low exam scores in the school and suggests that these were the sole factor in the decision to truncate. P.S. 40 was one of 23 elementary and middle schools throughout the city that were investigated for poor performance and were eligible for phase-out. P.S. 40 earned a D grade on its 2009-2010 Progress Report, including a D grade in the Student Performance sub-section and C grades for the Student Progress and School Environment sub-sections. Though P.S. 40 earned a B grade on its 2008-2009 Progress Report, this only put P.S. 40 in the 11th percentile; in other words, 89% of elementary schools in the city outperformed the school.

A school's Progress Report and/or Quality Review initially suggest a school be considered for intervention, but no single criterion leads to a decision about what interventions are appropriate. To identify the kind of action that will be best for the student community, the DOE reviews school data, consults with superintendents and other experienced educators who have worked closely with the school, and gathers community feedback. After completing that review, the DOE believes that truncating P.S. 40's sixth grade will allow the school to focus on elementary level instructional needs, thereby enabling P.S. 40 to turn around more efficiently.

In addition, as stated in the EIS, the proposal to truncate the sixth grade at P.S. 40 is also part of an effort to help standardize middle school application and entry grades in District 28. In June 2010, CEC 28 voted to adopt district-wide "Middle School Choice." Having elementary schools that terminate in different grades (i.e., K-5 versus K-6) creates unequal levels of access to high-quality schools based simply on the year that students exit elementary school. Middle schools typically enroll students beginning in sixth grade. This proposed truncation will thus give all P.S. 40 students access to the same range of middle school options as their peers throughout the District.

Comment 4 expresses concern about the negative effect the truncation could have for current fifth graders. The DOE believes this proposal will have an overall positive effect for current and future fifth-grade students at P.S. 40. In the past, many P.S. 40 students opted to remain at the school through sixth grade, while others chose to attend sixth grade at a District 28 choice middle school or J.H.S. 8 Richard S. Grossley, the middle school to which most P.S. 40 students are zoned. Specifically, approximately 66% percent of last year's fifth graders chose to articulate out of the school after the fifth grade.

In addition, P.S. 40 students who wait until sixth grade to apply to middle school are reserved a seventh-grade seat at their zoned school, but are otherwise restricted to other District

28 middle schools (zoned and unzoned (“choice”) that still have remaining seventh-grade seats. There are typically few such seats available, meaning that P.S. 40 sixth graders have limited access to the choice process compared with students who apply to middle school during fifth grade. If this proposal is approved, all P.S. 40 students will apply to middle school in fifth grade. This will give P.S. 40 students greater access to their top-choice middle schools.

P.S. 40 held a parent meeting on the morning and evening of October 20, 2010 to discuss middle school choice with fifth- and sixth-grade parents. The school also held parent meetings with DOE representatives from the Division of Portfolio Planning on December 15, 2010 and December 16, 2010 to discuss the proposed truncation, Middle School Choice, and answer parent questions and concerns.

In response to Comment 5, regarding the desire for a leadership change, the DOE took into consideration a range of possible interventions, including phase-out, leadership change, change in curriculum/program offerings, staff changes, and/or grade reconfiguration. After an extensive investigation process, the DOE believes that truncating P.S. 40’s sixth grade will allow the school to focus on elementary level instructional needs, thereby enabling P.S. 40 to turn around more efficiently.

In regards to the portion of the comment concerning the effect the truncation may have on future performance at P.S. 40, the DOE will continue to monitor and evaluate P.S. 40’s performance and environment, as it does with all City schools. The DOE will take into account the truncation of the sixth grade when it reviews school performance at P.S. 40. Indeed, the DOE believes that truncating P.S. 40’s sixth grade will allow the school to turn around more efficiently and lead to higher performance.

With regard to comment 6, 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 will be available on-line prior to the vote.

Changes Made to the Proposal

No changes in the proposal were made in response to public feedback.