



Public Comment Analysis

Date: February 2, 2011

Topic: The Proposed Phase-out of P.S. 260 Breuckelen (19K260)

Date of Panel Vote: February 3, 2011

Summary of Proposal

P.S. 260 Breuckelen (19K260, “P.S. 260”) is a zoned elementary school located at 875 Williams Avenue, Brooklyn, NY 11207, in Community School District 19, in Building K260 (“K260”). It currently serves students in Kindergarten through sixth grade, and it offers a full-day pre-Kindergarten program. The New York City Department of Education (“DOE”) is proposing to phase out and eventually close P.S. 260 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 approved, P.S. 260 would no longer admit Kindergarten students or offer grades one, two or six after the conclusion of the 2010-2011 school year. It would also not offer a pre-Kindergarten program after the conclusion of the 2010-2011 school year. Current students in grades two, three and four will continue to be served by P.S. 260 as they progress toward completion of elementary school at P.S. 260 and as fifth graders would participate in the District 19 Middle School Choice Process to enroll in middle school or his or her zoned middle school. Current fifth grade students would participate in the District 19 Middle School Choice process consistent with current practice or plan to enroll in his or her zoned middle school, which is either I.S. 68 Isaac Bildersee (18K068, “I.S. 68”) or J.H.S. 166 George Gershwin (19K166, “J.H.S. 166”). Current sixth graders are guaranteed a seventh grade seat at his or her zoned middle school.

Beginning in the 2010-2011 school year, after Kindergarten, first grade, and second grade are phased out, P.S. 260 will serve one grade less each subsequent year until it completes its phase-out in June 2014. Kindergarten and first grade students in P.S. 260 would be guaranteed a seat in a new zoned elementary school, P.S. 325 (19K325, “P.S. 325”) to be opened in K260, which is proposed in a separate Educational Impact Statement (“EIS”) that was published on December 17, 2010. The EIS was amended on January 24, 2011 to correct typographical errors and the projected enrollment ranges, clarify footnotes related to the building utilization rates and capacity, include 2010-2011 unaudited register data, and add information related to charter school options, past strategic improvement efforts offered to P.S. 260, and delete redundant paragraphs. Both the original and amended EIS are available online:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Feb32011Proposals> and in the main office of the school.

Pending funding availability, a pre-Kindergarten program would also be offered by P.S. 325 in K260. P.S. 325 would serve students residing in the P.S. 260 zone in Kindergarten through fifth grade when fully phased-in. In 2009-2010, K260 had a target capacity of 403 students, and the building enrolled 362 students, yielding a target building utilization rate of 90%. In 2010-2011, there was a total of 314 students enrolled at P.S. 260, including one section of 18 students in pre-Kindergarten, yielding a target capacity of 78%.

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 it received fifteen written comments describing how inconsistency with the administration of the school has led to its current state, but the school has great potential and many bright spots which could help it turn around if it were given time. Comments similar to these are addressed in the analysis presented below.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at P.S. 260 Breuckelen on January 25, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 107 members of the public attended the hearing, and 31 people spoke. Present at the meeting were interim District 19 Superintendent Rose Marie Mills; P.S. 260 Principal Pierre Raymond; and Community Education Council 19 representative Kobir Chowdhury.

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

1. Community Education Council member Kobir Chowdhury commented that it was evident there were problems with the school seven years ago, and that the DOE should have addressed them then. He also stated that he believes the decision to close the school has already been made and therefore nothing that happens in this hearing will change that decision.
2. New York City Council member Charles Barron commented that this hearing was an exercise in futility. He questioned whether the school had a library, science lab, or computers, and said that 1 in 3 computers in the school are broken and that the school did not have a principal in 2008. He stated this proposal was part of an agenda to replace district schools with charter schools in the long run. He further stated that the DOE noticed these problems years ago, but did nothing to address them.
3. A representative from N.Y. State Assembly member Inez Barron's office commented that phasing out schools is not the proper method to improve schools. She also said that the office could not find any evidence of assistance given to the school over the past few years.

4. A representative from N. Y. State Senator John Sampson’s office commented that the problems with the school included: not having a principal for a year, lack of resources and funding, and an insufficient reading program.. He also stated that the accountability standards for schools have changed from year to year, and therefore a school could get an “A” on its Progress Report one year, and a “D” the next year.
5. Multiple commenters commented that the school was not provided enough support while it was struggling.
6. One commenter commented that the school serves a large number of “high needs students,” designated as students with disabilities or English language learners (“ELLs”). He also stated that many high-performing students who were zoned to P.S. 260l attended other schools, which led to low achievement at P.S. 260.
7. One commenter commented that the current teachers at P.S. 260 know the school and students, and that new teachers would be unsuccessful in this environment.
8. Multiple commenters commented that the lack of a principal for several months led to the school’s failure.
9. Multiple commenters commented that the school did not have the same physical resources, such as technology resources, white boards, and textbooks as other schools.
10. Multiple commenters commented that the school has had safety issues and has not been supported by the DOE to address them.
11. One commenter commented that students with disabilities will be most harmed by this phase out.
12. Multiple commenters commented that the school suffered from instructional instability, which included the introduction of four different reading programs. and high turnover in Principal and AP positions.
13. One commenter commented that the school has close ties to the community and therefore this proposal should be not approved.
14. A written submitted question asked when did the DOE begin to consider this proposal to phase out and eventually close P.S. 260.
15. A written submitted question asked what happens to the students of the school if this proposal is approved.
16. A written submitted question asked how long the school has been deteriorating.

The DOE received a comment at the Joint Public Hearing which did not directly relate to the proposal and therefore will not be addressed.

- New York City Council member Charles Barron stated that Cathie Black was not qualified to be Chancellor.

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

17. One commenter expressed opposition to the proposal because the commenter felt more structural support should have been provided to P.S. 260. The commenter recommended that the DOE provide support by offering quality academic tools to teachers, a consistent curriculum, and a more positive environment.
18. Multiple commenters expressed concern about low teacher attendance. One commenter expressed support for the proposal because low teacher attendance has had a negative effect on the school's instructional quality.
19. One commenter inquired about transferring his or her student out of P.S. 260 and thanked the DOE for making the process clear at a parent meeting on December 9, 2010.
20. One commenter submitted a resolution that opposed the phase out K260 for the following reasons:
 - a. the school has the potential to succeed and given the school's Accountability Status of "In Good Standing" it has the potential to overcome obstacles
 - b. the school was previously mismanaged and the DOE did not adequately support the school, there was instability in leadership, curriculum offerings and class assignments were inadequate; the DOE did not reduce class size or invest in resources such as technology; there was a failure to address concerns over student safety and respect; and a failure to address the overall school environment.
 - c. P.S. 260 staff and parents have supported the school by revising of the Comprehensive Education Plan; implementing the core knowledge program; attempting to create a safety plan with adequate academic and support resources; introducing extracurricular and athletic activities, or field trips to enrich student academic life; and improved attendance rates from 87.7% to 91.6%.
 - d. the DOE should support "open enrollment" schools like P.S. 260 that have significant populations of students with special needs and students living in poverty.
21. The resolution recommended that the DOE provide support to P.S. 260 by:
 - a. have a principal in place at the start of every school year and support school leadership;
 - b. provide and support a high-quality reading program;
 - c. provide stable class sizes and regular assignments;
 - d. and work on safety issues.
22. 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, 2, and 16 note that the problems with P.S. 260 have been apparent for several years. The DOE agrees that P.S. 260 has been unable to meet the needs of its students for several years, as indicated by the school's "F" grade on its 2007-2009 Progress Report and the "D" grade on its 2009-2010 Progress Report. Furthermore, P.S. 260 has struggled to improve student performance. In 2007-08, P.S. 260 was in the bottom

22% in Citywide math proficiency and in the bottom 9% for Citywide English proficiency. In 2008-09, P.S. 260 was in the bottom 17% in Citywide math proficiency and in the bottom 7% in English proficiency. During the 2009-2010 school year, only 32% of P.S. 260 students were performing on grade level in math, putting P.S. 260 in the bottom 7% of all elementary schools in New York City. That same year, only 22% of P.S. 260 students were on grade level in English, putting P.S. 260 in the bottom 5% of elementary schools Citywide. According to the 2009-2010 Learning Environment Surveys, only 57% of students reported that they felt safe in hallways, bathrooms, and locker rooms at P.S. 260. Despite the DOE's support, P.S. 260 has not been able to increase the number of students who feel safe at the school. Finally, attendance at P.S. 260 remains low. In both 2007-2008 and 2008-2009, P.S. 260's attendance rate was 87.7%. The 2009-2010 attendance rate was 91%, in the bottom 9% among all elementary schools Citywide and below the Citywide average of 94%.

- Comments 2, 4, 8, 12, and 21(a) relate to the lack of consistent school leadership's impact on the school. Contrary to the suggestions made in the comments, the current principal of P.S. 260 has been the principal of P.S. 260 since September 4, 2007. Also, the current assistant principal at P.S. 260 has been the assistant principal since 2008. The DOE acknowledges that teacher turn over has been high; in 2009-2010, approximately 14% of P.S. 260's teachers left the school, compared to the citywide annual teacher turnover rate of 4.6%. Commenter 2 also commented that the school lacks a library, science lab, or functioning computers. But, according to the building survey conducted by the Director of Space Planning, building K260 currently has a library. Because P.S. 260 serves primarily elementary students, there is not a science demonstration room or a science lab room in the building. Finally, P.S. 260 adopted an anthology reading program for kindergarten through third grade students in 2009-2010, and the school expanded this program for fourth through sixth grade students this year.
- Comment 3 noted that phasing out schools was not the proper method to improve schools. In New York City, we are striving to create a system of great schools. To accomplish this goal, we've replaced 91 of our lowest-performing schools with better options and opened 474 new schools. Of the 474, 365 are traditional public schools and 109 are public charter schools. As a result, we've created more good choices for families. P.S. 260 will continue to serve students as it phases out so all current elementary school aged students in grades 2-4 would be able to complete elementary school at P.S. 260, all students in grade 5 will participate in the Middle School Choice process this year, and all sixth grade students will enroll at their zoned middle school, assuming they continue to meet promotional standards.
- Comments 2, 3, 4, 5, 9, 10, 17, 20(b), 21(b-d) relate to resources and supports that DOE gave P.S. 260. P.S. 260's Network Leader was not contacted regarding any issues concerning sufficient physical resources and instructional materials until 2010-2011 when the school asked for more computers. As discussed earlier, the school was provided with additional computers as requested. In addition, as noted in the EIS for this proposal, the DOE provided the following supports to P.S. 260:

Leadership Support:

- Providing monthly professional development to the principal on how to evaluate the effectiveness of teaching strategies in literacy, mathematics, and other subject in meeting students' needs.
- Helping the principal develop P.S. 260's Comprehensive Education Plan and school goals.
- Connecting administrators with other schools to learn effective practices that could be replicated at P.S. 260.

Instructional Support:

- Providing professional development to assistant principals to help them better evaluate student work and use accountability tools.
- Providing onsite support for teacher observations and improving instructional practices.
- Offering teacher training in collaboration, evaluating student work, and developing assessments.
- Supporting the implementation of ongoing assessments in reading and math for students in grades K-3 and Acuity assessments for students in grades 3-6 to determine if students are on track to meet ELA and math standards.

Operational Support:

- Guided the implementation of more than \$138,000 in grant funding. The school received an American Recovery and Reinvestment Act (ARRA) grant for the past two years and used the money to implement new programs such as Achieve 3000, Vmath Live, PBIS, and Connect with Kids.
- One-on-one support and training for the principal in human resources, operations, compliance, curriculum and instruction, and utilization of data.

Student Support:

- Helping to identify strategies to improve attendance efforts and patterns.

Safety Support:

The DOE makes available the following supports to schools around safety and security:

- Providing Best Practices Standards for Creating and Sustaining a Safe and Supportive School resource guide.
 - Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and NYPD).
 - Providing technical assistance when incidents occur via the Borough Safety Directors.
 - Providing professional development and support to CFN Safety Liaisons.
 - Providing professional development and kits for Building Response Teams.
 - Monitoring and certifying School Safety Plans annually.
- Comments 6 and 20(d) note that P.S. 260 serves a larger proportion of ELLs and students with disabilities. Like most New York City public schools, P.S. 260 serves a high-need population: 9% of students require special education services and 5% are English language learners. But other schools serving similar students have achieved better results.

- At P.S. 45 Horace E. Greene, a Brooklyn school that is in P.S. 260's peer group, 8% of students require special education services and 9% of students are English language learners. At that school, 43% are on grade level in English and 51% of students are on grade level in math.
 - At P.S. 41 Gun Hill Road, a Bronx school that also is in P.S. 260's peer group, 12% of students require special education services and 14% of students are English language learners. At that school, 44% are on grade level in English and 62% of students are on grade level in math. P.S. 41 is also in the top 2% of elementary schools citywide in helping students make progress in both English and math.
 - While all students are still not where we'd like them to be, these schools are getting far better results while serving a similar mix of elementary school students compared to P.S. 260.
- Comments 7 and 13 note that P.S. 260's staff and faculty have formed close ties to the community. The DOE believes that the school community will continue to care for students as it phases-out. In addition, the DOE believes the proposed replacement school will also continue to care for students in the community and establish strong community ties. The DOE has been successful in 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 replacing low-performing schools with new ones.
 - Comment 11 notes that students with disabilities will be most harmed by this proposal if it is approved. As noted in the EIS, the DOE will continue to provide individualized programming for students with disabilities as the school phases out. Moreover, the new replacement school for P.S. 260 will also provide all mandated services for students with disabilities.
 - Comment 14 asks when the DOE began to consider this proposal to phase out and eventually close P.S. 260. The DOE initiated a comprehensive review of P.S. 260 with the goal of determining what intensive supports and interventions would best benefit the P.S. 260 community after it received P.S. 260's 2009-2010 Progress Report.
 - Comment 15 asks about students' enrollment options once P.S. 260 as has been phased out. As discussed in the EIS for this proposal, P.S. 260 would be phased out gradually over the next several years and would no longer admit new pre-Kindergarten or Kindergarten students after the end of this school year. However, most current students would stay at P.S. 260 as it phases out.

Below are the enrollment plans for current P.S. 260 students, if P.S. 260 phases out.

- **Kindergarten and first grade students** are guaranteed a seat in the new elementary school that will open next September in the building where P.S. 260 is located.
- **Second, third and fourth grade students** will continue at P.S. 260. After your child completes fifth grade, he or she will participate in the Middle School Choice process and enroll in sixth grade at a choice middle school or his or her zoned middle school.

- **Fifth grade students** will participate in the Middle School Choice process this year and enroll in sixth grade at a choice middle school or his or her zoned middle school.
- **Sixth grade students** will enroll in seventh grade at his or her zoned middle school, J.H.S. 166 in District 19, or I.S. 68 in District 18.
- Comment 18 supports the proposal and does not need to be addressed.
- Comment 19 asks about how parents can transfer their students from P.S. 260. Chancellor’s Regulation A-101 outlines the procedures for requesting transfers. As stated above, most current P.S. 260 students would stay at P.S. 260 as it phases out.
- Comment 20(a) and 20(c) note that P.S. 260 should not be phased out, rather it should be given the opportunity to improve and that parents and staff at P.S. 240 continue to support the school. The DOE recognizes that P.S. 260 staff members and parents have worked hard to improve the school, but the school has not turned around. P.S. 260 students have not shown any signs of improvement over the last three years. In 2009-2010, P.S. 260 was in the bottom 3% of elementary schools in learning growth in math and the bottom 16% of elementary schools in learning growth in English. In 2008-2009, P.S. 260 was in the bottom 7% of elementary schools in learning growth in math. Furthermore, while the school’s attendance improved between 2008-2009 and 2009-2010 from 87.7% to 90.7%, that is still below the Citywide average attendance rate for elementary schools, 93.5%.
- With respect to comment 22, 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.