



Dennis M. Walcott  
Chancellor

## **Public Comment Analysis<sup>1</sup>**

Date: March 8, 2013

Topic: The Proposed Phase-Out of P.S. 230 Dr. Roland N. Patterson (09X230)  
Beginning in 2013-2014

Date of Panel Vote: March 11, 2013

---

### **Summary of Proposal**

P.S. 230 Dr. Roland N. Patterson (09X230, “P.S. 230”) is an existing zoned district elementary school in building X229 (“X229”) located at 275 Harlem River Park Bridge, Bronx, NY 10453, in Community School District 9 (“District 9”). It currently serves students in grades kindergarten through five. P.S. 230 is co-located with I.S. 229 Roland Patterson (09X229, “I.S. 229”) in the X229 building. I.S. 229 serves students in grades six through eight and admits students through the District 9 and 10 Middle School Choice Process.

On January 22, 2013, the New York City Department of Education (“DOE”) issued an educational impact statement (“EIS”) describing a proposal to phase out P.S. 230 based on its poor performance and the DOE’s assessment that the school lacks the capacity to improve quickly to better support student needs.

Schools are identified for possible phase-out for any of the following three reasons: (1) they received poor grades on their annual Progress Report; (2) they received a poor score on their most recent Quality Review; or (3) they have been identified by the New York State Education Department (“SED”) as a Priority School, defined by SED as one of the bottom 5% of schools in the state. In August 2012, SED identified 221 Priority schools across the State, including 122 in New York City. Elementary schools are identified as Priority based on the school’s state test performance.

Specifically, under the DOE’s accountability framework, all schools that receive a grade of D, F, or a third consecutive C grade or lower on their annual Progress Report and all schools that receive a rating of Underdeveloped on the Quality Review are evaluated for intensive support or intervention, including the possibility of phase-out. Progress Reports are released by the DOE each fall and evaluate schools on a scale of A through F based on Student Progress, Student Performance, School Environment, and, new

---

<sup>1</sup> The DOE will continue to accept comments concerning this proposal up to 24 hours prior to the Panel for Educational Policy’s (“PEP”) vote on March 11, 2013. Any additional comments will be addressed in an amended Public Comment Analysis which will be made available to the PEP before it votes on this proposal.

to the Progress Report in 2011-2012, College and Career Readiness. During Quality Reviews, experienced educators visit a school over several days, observing classrooms and talking with students, staff, and families. Schools are rated on the following four-point scale: “Underdeveloped” (the lowest possible rating), “Developing,” “Proficient,” and “Well Developed” (the highest possible rating).

P.S. 230 received an overall F grade on its Progress Report in 2011-2012 following two consecutive years of overall C grades in 2009-2010 and 2010-2011. The school was rated “Developing” on its most recent Quality Review in 2010-2011. The school was also designated a Priority School by the SED.

As a result, the DOE initiated a comprehensive review of P.S. 230, with the goal of determining what intensive supports and interventions would best benefit its students and the P.S. 230 community. During that review, the DOE looked at recent historical performance and demand data from the school, consulted with superintendents and other experienced educators who have worked closely with the school, and gathered community feedback.

After completing that review, the DOE believes that only the most serious intervention—the gradual phase-out and eventual closure of P.S. 230—will address the school’s performance struggles and allow for a new school option to develop in X229 that the DOE believes will better serve students and the broader community.

In a separate EIS, also released on January 22, 2013, the DOE proposed to co-locate a new zoned district elementary school, 09X274, which will serve students in kindergarten through fifth grade in X229 when it reaches full scale in the 2016-2017 school year. In an effort to improve the educational options available to ELL students, 09X274 will offer bilingual programming in accordance with community need based on parent choice. The new school will also offer two sections of full-day pre-kindergarten.

If the phase-out proposal and the related replacement proposal are both approved, P.S. 230 will no longer admit new kindergarten students and will no longer offer grades kindergarten, one, and two after the conclusion of the 2012-2013 school year. Beginning in the 2013-2014 school year, after P.S. 230’s kindergarten, first grade, and second grade have been eliminated, P.S. 230 will serve one less grade in each subsequent year until it completes its phase-out and closes in June 2016.

Current students in kindergarten and first grade at P.S. 230—whether or not they meet promotional standards—will be automatically enrolled in 09X274 in building X229. Current students in second grade who meet promotional standards will continue to progress at P.S. 230. However, any second-grade students who do not meet promotional standards will complete second grade at 09X274. Current students in third and fourth grades will continue their education at P.S. 230 next year, regardless of whether they meet promotional standards.

Current fifth-graders will proceed to apply to middle school via the District 9 and 10 Middle School Choice process, unless they do not meet promotional standards, in which case they will continue fifth grade at P.S. 230. In cases where students do not meet promotional requirements by June 2016, they will be served in 09X274.

The EIS containing additional details of this proposal, along with the EIS describing the proposed co-location 09X274 in the X229 building, can be accessed here:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm>.

Copies of the EIS are also available in the main offices of P.S. 230 and I.S. 229.

### **Summary of Comments Received at the Joint Public Hearing**

A joint public hearing regarding the proposals to phase-out P.S. 230 and co-locate 09X274 was held at the X229 building on February 25, 2013. Members of the School Leadership Team (“SLT”) from P.S. 230 and I.S. 229 were invited to participate. At that hearing, interested parties had an opportunity to provide input on the proposals. Approximately 220 members of the public attended the hearing, and 32 people spoke. Present at the meeting were P.S. 230 SLT members, including Teresa Gill, Wendel Deloatch, Leona Williams, and Yvette Jenkins; P.S. 230 Principal Rowena Penn; I.S. 229 Principal Ezra Matias; District 9 Superintendent Dolores Esposito; Community Education Council 9 (“CEC 9”) President Marilyn Espada; and several DOE officials, including Deputy Chancellor Shael Polakow-Suransky who served as the Chancellor’s Designee, Gregg Bethel who facilitated the hearing, Brendan Lowe, Sara Kaufman, and Henry Bluestone Smith.

#### **The following questions, comments, and remarks were made at the joint public hearing:**

1. CEC 9 President Marilyn Espada spoke in opposition to the phase-out proposal and offered several reasons why, in her belief, P.S. 230 should remain open:
  - a. She believes that the DOE has not provided adequate supports to the school or to District 9 schools, in general, and asked what the DOE had done to help P.S. 230 over the past few years when the school received back-to-back “C” grades.
  - b. She stated that there had been a recent influx of students with Individualized Educational Programs (“IEPs”) at the school, which had contributed to the school’s performance struggles because the DOE did not provide the school with adequate supports to serve these students.
  - c. She also stated her belief that it is unfair to give charter schools space in public school buildings because charter schools do not accept low-performing students.
  - d. Ms. Espada further stated that the DOE cannot describe the staff at P.S. 230 as failing their students until the DOE can prove that professors from Ivy League institutions would have success teaching District 9 students with the same literacy program that teachers at P.S. 230 are currently forced to use.
2. Members of the P.S. 230 SLT offered a PowerPoint presentation in opposition to the phase-out proposal. The presentation included several separate justifications for keeping the school open, including:
  - a. Purported inaccuracies in the EIS that describes the phase-out proposal, namely the omission of positive feedback from early engagement discussions, the inclusion of supports that had not been offered to the school, and the inclusion of programs and learning environments that are no longer offered at the school,
  - b. The claim that programs and recent changes in the educational program of the school are and will continue to lead to improvements in student performance,
  - c. The claim that the layout of the X229 building is the primary cause of the ongoing performance struggles at P.S. 230. In support of this claim, the SLT provided performance data from the school’s English Language Learners (“ELLs”) and Students with Disabilities (“SWDs”) and suggested that the school is effectively

serving these students because they have access to closed classroom space, and that other students at P.S. 230 would similarly benefit from having access to closed classroom space.

- d. The claim that the school has been hampered by principal and staff turnover in recent years. The presentation indicated that the school had not received proper support in its attempts to retain qualified staff members, that many staff members struggle to find parking at the school and are concerned about vandalism and safety in the area. Additionally, the high rate of principal turnover has contributed to the school's inability to retain highly-qualified staff members. The SLT presentation included reference to academic studies showing the negative impact of principal and staff turnover on student achievement.
3. The SLT presentation also suggested that P.S. 230 could submit an Action Plan as an alternative to phase-out because the school has the capacity to improve. According to the SLT, changes such as providing enclosed classroom space, smaller class sizes, additional funding to support integrated co-teaching ("ICT") models, additional professional development support that would improve educational outcomes for struggling students, a community health center, leadership coaching, grant support, and attendance support would all lead to improved student performance at P.S. 230.
  4. Several speakers, including current and former students, parents, and staff members spoke in general opposition to the phase-out proposal. These speakers, often citing personal anecdotes and stories of success, generally felt that P.S. 230 is a positive learning environment that serves students effectively and that the staff and leadership in place at the school are capable of helping students succeed.
  5. One commenter stated that the Mayor does not include teachers in his education policy decision-making and that, as a result, P.S. 230 has not received adequate support from the school's Network.
  6. One commenter stated that students at the school face great obstacles at home and in the community and that the school does not have the necessary supports to help these students succeed. She also stated that, according to the United Federation of Teachers ("UFT"), phase-outs may violate federal law.
  7. Several commenters, including a woman who identified herself as a UFT District Representative, indicated their belief that the layout and classroom design of building X229 was the main reason that P.S. 230 has struggled.
  8. One commenter noted that while the EIS made reference to a wide range of supports that had been offered to P.S. 230, there was nothing in the way of 'community support.' This commenter, along with several other commenters, stated that the DOE should come help the community and work with parents here instead of phasing the school out.
  9. One commenter, who identified herself as a teacher at P.S. 230, asked why the proposed new school would serve pre-kindergarten when P.S. 230 had not been approved to serve pre-kindergarten students. The commenter also stated her belief that education is being run like it is part of the corporate world and that as a result, the bosses who have been telling teachers what

to do should be held accountable for students' shortcomings. In addition, citing stories of personal tragedy for several of her students, the commenter stated her belief that there are not enough emotional supports for children in this neighborhood.

10. One commenter, who identified himself as a teacher at P.S. 230, stated that he has seen changes taking place at the school since he arrived several years ago. He stated that all of the changes taking place at the school have been data-driven and are based on the prescription that was given to teachers from bosses. He stated that as a result, the bosses, rather than the teachers, should be held accountable for the school's ongoing struggle with performance. In addition, the commenter suggested that, as had been done in other areas, the federal government could step in to assist rather than close schools like P.S. 230.
11. James Moore, the founder of 'Roadmap to Manhood' – a non-profit mentoring organization that is in operation at P.S. 230 –stated that the DOE data presented in the EIS does not reflect the passion of the teachers at the school. He stated that instead of phasing-out the school, the DOE should provide real supports such as additional funding (to support ICT classes, among other things), improvements to classroom design, pre-kindergarten, and smaller class sizes.
12. Drema Brown, a former principal at P.S. 230, stated that when she arrived at the school in 2003, achievement at the school was lower than it is today. She stated that people at the school know the path to improvement, but needed additional resources to remove barriers to learning. She also stated that the community's isolation put the school in a unique position.
13. Karen Alford, the UFT Vice President of Elementary Schools, stated that the DOE is abandoning its responsibility to children and suggested that, instead, the DOE should listen to the SLT, open the school library, fund building partitions, and invest in the community to retain good teachers. She also stated that there was not a better staff or a more well-thought out plan than the one that is already in place at P.S. 230.
14. Ms. Teresa Gill, a member of the P.S. 230 SLT, stated that, from a parents' point of view, crime, eviction, and other community issues mean that parent involvement and additional resources were badly needed at the school. She further stated that P.S. 230 is the one constant in many students' lives and that phasing out the school would hurt the emotional well-being of students.
15. One commenter, who identified herself as a P.S. 230 parent and SLT member, suggested that instead of phasing the school out the DOE should review the performance of the Superintendent. She used a personal anecdote about her efforts to get her son specialized services to suggest that school-level personnel are capable and it's DOE officials who are failing the students at P.S. 230. She also referenced the building layout as a major obstacle to student achievement.
16. An individual affiliated with SCAN-NY, a community-based organization that works with P.S. 230, suggested that changes in achievement at P.S. 230 were a product of budget difficulties and the school's difficulty in securing grant funding that had helped students achieve in the past. In addition, he noted that P.S. 230 had asked for a pre-kindergarten program for several years, but that the DOE had not supported the school's request.

17. One commenter, who identified herself as a parent, asked whether there was any guarantee that the replacement school would do better than P.S. 230. She stated that instead of building prisons, we should be fixing schools and that at P.S. 230 that meant adding sound-proofing, bilingual programs, and pre-kindergarten.
18. One commenter stated that given the conditions of the building and the classroom layout, a “C” grade is good for this school. He further inquired why the school couldn’t add doors to classes or a mental health clinic and suggested that the DOE focus on community engagement with parents from the nearby Towers.
19. One commenter stated his belief that phasing a school out had a negative psychological and emotional impact on children. The commenter also suggested that it takes three years to improve educational outcomes.
20. Several commenters stated that the school needed additional funding in order to be successful.
21. One commenter, who identified himself as a special education teacher at P.S. 230, stated that he explained the concept of phase-outs to his students using the analogy of settlers moving west and displacing the Native Americans. He stated his belief that support systems and positive programs like pre-kindergarten will be given to other schools but not P.S. 230, which effectively backs the school into a corner.
22. One commenter, who identified himself as a representative from the Council of School Supervisors and Administrators (“CSA”), read a prepared statement that voiced general opposition to phase-outs as an approach to improving education. He also stated that he had visited P.S. 230 on several occasions and believed the principal and staff to be hard working and dedicated. The commenter noted that when he was a principal, he was given time to improve his school and that if the DOE afforded P.S. 230 this same opportunity instead of searching for a quick fix that the results would improve here as well.

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

23. One written question asked why Option 1, which entails the development of an action plan, and which was presented as a possible intervention strategy during the early engagement process, wasn’t chosen as an alternative to phase-out.
24. One written question asked why suggestions that were offered by teachers at a previous meeting – including the addition of new walls, recess time, and art classes – weren’t followed up on.
25. One written question asked how the DOE could ensure that the charter school replacement would do any better.
26. One written question asked what improvements or structural changes would be made to the building if a charter school was sited here, and asked why those same improvements couldn’t be made at P.S. 230.
27. One question, submitted in writing, asked if the DOE had considered re-zoning the school.

28. One comment, submitted in writing, held that by phasing-out P.S. 230 the DOE was putting teachers' jobs at risk.

**The DOE received a number of Written and/or Oral Comments along with comments at the Joint Public Hearing which did not directly relate to the Proposal**

Comments 1c, 25, and 26 raise the issue of charter schools in relation to the phase-out proposal.

As described in the relevant EISs, the DOE plans to replace P.S. 230 with a new district elementary school, 09X274. There are no charter schools involved in this proposal.

The Analysis of Public Comments regarding the related proposal to open and co-locate a new school (09X274) in the X229 building is available at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm>.

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

Comments 1b and 6 attribute the school's performance struggles to student demographics and the amount of high-need students at the school.

The overall Progress Report grade is designed to reflect each school's contribution to student achievement, no matter where each child begins his or her journey to career and college readiness. The methods are designed to be demographically neutral so that the final score for each school has as little correlation as possible with incoming student characteristics such as poverty, ethnicity, disabilities, and English learner status. To achieve this, the Progress Report emphasizes year-to-year progress, compares schools mostly to peers matched based on incoming student characteristics, and awards additional credit based on exemplary progress with high-need student groups. Each school's performance is compared to the performance of schools in its peer group, which is comprised of New York City public schools with a student population most like the school's population, according to the peer index. The peer index is used to sort schools on the basis of students' academic and demographic background, and the formula to calculate a school's peer index includes the percentage of students eligible for free lunch, the percentage of students with disabilities, the percentage of Black/Hispanic students, and the percentage of English Language Learner ("ELL") students at the school.

As a result, the Progress Report grade that P.S. 230 received takes full account of the school's high-need student body. The table below shows the percentage of students at P.S. 230 in recognized high-need student categories and compares it to the average percentage of such students at all other schools in the P.S. 230 peer index group.

DBN	School	% IEP	Economic Need Index	% Black or Hispanic	% ELL	Peer Index	Overall PR Score	% ELA Level 3/4	% Math Level 3/4
09X230	P.S. 230 Dr Roland N. Patterson	19.0%	94.7%	95.8%	20.2%	64.85	20.4	16.1%	22.6%

All other schools in P.S. 230's Peer Index Group	20.9%	91.9%	96.5%	20.5%	64.83	48.5	35.1%	48.3%
Difference	-1.9%	2.8%	-0.7%	-0.3%	0.02	-28.1	-19.0%	-25.7%

When compared to other schools in the peer index group, the data indicates that P.S. 230 does not serve a disproportionately large number of high-need students.

The data also indicates that other schools serving similar student populations have been more successful in meeting the needs of their students and promoting academic achievement.

Relevant data from the three other District 9 elementary schools in P.S. 230's peer index group are included in the table below. In addition to having comparable numbers of high-need students and significantly higher ELA and Math proficiency scores, all of the other District 9 elementary schools listed below also have higher progress and growth scores for both ELA and Math achievement.

DBN	School	% IEP	Economic Need Index	% Black or Hispanic	% ELL	Peer Index	Overall PR Score	% ELA Level 3/4	% Math Level 3/4
09X230	P.S. 230 Dr Roland N. Patterson	19.0%	94.7%	95.8%	20.2%	64.85	20.4	16.1%	22.6%
09X063	P.S. 063 Author's Academy	19.3%	91.7%	98.8%	19.6%	64.90	65.7	60.5%	72.2%
09X110	P.S. 110 Theodore Schoenfeld	24.8%	91.0%	98.6%	9.6%	65.25	53.9	45.4%	51.3%
09X204	P.S. 204 Morris Heights	16.2%	96.0%	99.3%	15.2%	64.96	79.8	55.7%	74.5%

As a result, the data does not support the claim that P.S. 230's ongoing struggle with student achievement is simply a product of the fact that the school serves a number of high-need students.

Comments 1a, 1d, 3, 8, 9, 11, 12, 13, 14, 16, 17, 18, and 20 contend that P.S. 230 historically has not received sufficient support or funding, and propose that the DOE provide additional funding and resources for P.S. 230 to succeed as opposed to phasing out the school. The additional supports requested by these commenters included:

- A mental health center
- The creation of ICT classes
- Improved professional development offerings and leadership coaching
- A pre-kindergarten program
- A bilingual program
- A reduction in class sizes
- Parental Support
- Community Support
- Opening of the School Library

As noted in the EIS, the DOE has offered numerous supports to P.S. 230 in an effort to improve performance, including:

**Leadership Support:**

- Assisting the principal and assistant principals in the development of instructional plans and goals for the school year, in support of the school’s Comprehensive Education Plan.
- Coaching the principal and assistant principals in the use of classroom observations and feedback to enhance teacher effectiveness.
- Facilitating monthly professional development opportunities for the principal and assistant principals to enhance English Language Arts and Math instruction in the school.

**Instructional Support:**

- Providing coaching for teachers on the alignment of literacy and math curriculum and classroom practice to citywide instructional expectations.
- Providing coaching for teachers on effective instructional practices for improving academic outcomes for students with disabilities and students performing below grade level.
- Facilitating professional development opportunities for school staff focused on addressing the instructional needs of English Language Learners.

**Operational Support:**

- Advising school staff on student attendance, budget and human resources issues.
- Training school staff in the use of student data systems to facilitate attendance tracking and the efficient preparation of student’s class schedules.
- Supporting school staff in meeting compliance requirements for students with disabilities in order to ensure that students are receiving mandated services.

**Student Support:**

- Assisting the school administration in the development of a school safety plan to reduce safety incidents and suspension rates, and promoting best practices for dealing with difficult behavior patterns to improve the school’s culture and learning environment.
- Coaching the school administration and staff on efforts to promote youth development strategies to support students’ social and emotional needs, as well as helping the school incorporate goals for social and emotional learning into the Comprehensive Education Plan.

P.S. 230 has received individualized support plans, as well as centralized services that the DOE provides to all schools—yet despite this extensive assistance, the school has failed to meet the needs of its students and families.

In addition, the DOE looked at a wide range of data and on the ground information before identifying P.S. 230 as a struggling school in November. As a struggling school, P.S. 230 underwent strategic action planning. These plans identified concrete action steps, benchmarks, and year-end goals aimed at immediately improving student achievement. This plan also outlined 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.

In addition to our quantitative 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 P.S. 230, 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, we came to the decision that P.S. 230 does not have the capacity to improve quickly enough to meet the needs of its students even with the addition of particular supports or resources.

With respect to funding, P.S. 230's budget is determined in the same manner as all other schools across the City. In New York City, schools are funded 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 DOE had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls.

In light of this fact, it cannot be said that changes to P.S. 230's budget have put the school at a disadvantage in terms of student performance as compared to any other school in the City.

The suggestion that P.S. 230 would succeed if the DOE allocated additional resources to is belied by the successes of students at schools in P.S. 230's peer index group, which are funded in the same manner as P.S. 230, which have received comparable support and which face many of the same issues with respect to community engagement and parental involvement that commenters described at the public hearing. We count on each of our schools to provide a high-quality education to its students—and we hold all schools to the same high standard. If a school isn't getting the job done for its students, we are compelled to take serious action to ensure its students don't fall even further behind.

With respect to pre-kindergarten, the maintenance of these programs is subject to funding and demand at all schools across the City. This year, the DOE put in place an application process for schools to apply to open up new pre-kindergarten programs. P.S. 230 did not submit a request for pre-kindergarten this year.

With respect to ICT classes, as described below in the response to comment 2a, zoned elementary schools like P.S. 230 have an obligation to provide appropriate educational services to all students who enroll at the school. The absence of ICT classes suggests that no students currently enrolled at P.S. 230 are in need of ICT services.

With respect to the addition of a bilingual program, all schools across the City have the ability to offer bilingual programming in accordance with community need, based on parent choice. For

additional information regarding the availability of ELL programming at DOE schools, please visit the DOE Web site at:

<http://schools.nyc.gov/Academics/ELL/FamilyResources/ELL+Programs.htm>

With respect to the school library, the school's Network has confirmed that the library in the X229 building is open and staffed by school aides from 9:00 AM – 10:30 AM and from 1:00 PM – 2:45 PM. Staffing decisions for the school's library, like all other staffing decisions, are made by the school leader.

Finally, it is important to note that many of the additional supports described by commenters involve requests for additional funding from the DOE. All public schools in the city are funded through a per pupil allocation. That is, funding “follows” the students and is weighted based on student's grade level and need (incoming proficiency level and special education/English Language Learner (“ELL”)/Title I status).

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

While every school across the City receives funding via the same formula, some schools have been less successful in serving students than their peer schools that serve similar populations. After the comprehensive review of school data and community feedback, the DOE believes that P.S. 230 lacks the capacity to improve quickly enough to provide its students with the best educational options, and only the most serious intervention—the gradual phase-out and eventual closure of P.S. 230—will best serve students and the community.

Comment 2a claimed that the EIS describing the proposal contained a number of inaccuracies, including:

- The inclusion of several Network-based supports identified in EIS that the SLT suggested may not have taken place,
- The omission of positive feedback gathered during early engagement,
- The omission of complaints and obstacles to student achievement that were raised by staff members during early engagement
- The inclusion on page 9 of the EIS of Golden Hour, Silver Hour, Project Arts Funding, and Integrated Co-Teaching (“ICT”) Classes, which are programs not offered at P.S. 230

P.S. 230 is supported by Children First Network 104. The Network-based supports identified in the EIS were compiled by the school's Network and are included above in the response to comments 1a, 3, 8, 9, 11, 12, 13, 14, 16, 17, 18, and 20. While the SLT member presenting at the public hearing may not have been aware of all of these supports, the Office of School Supports has confirmed that these supports were in fact offered to administrators and staff members at P.S. 230.

With respect to the ‘Summary of Community Feedback’ portion of the EIS, the data included in this section is not presented as nor intended to be an all-inclusive description of every comment

that was offered by SLT members, staff members, and parents during early engagement. Rather, this section is intended to provide insight into the investigation process and into the reasoning behind the decision to propose the school for phase-out. That a given complaint about the school environment or a suggestion as to why the school should not be phased-out is not included in this section does not mean that it was ignored in the DOE's decision-making process.

Golden Hour, Silver Hour, and Project Arts are listed on the P.S. 230 Web site as special programs and extracurricular activities currently offered by the school. The P.S. 230 Web site can be accessed at: <http://schools.nyc.gov/SchoolPortals/09/X230/default.htm>

As a zoned school, P.S. 230 must accept all zoned students who seek to enroll at the school. Therefore, while the school may not currently maintain any ICT classes, the school does offer ICT classes to all students who are identified as needing an ICT placement.

Comments 4, 2b, 12, and 22 suggested that the school is serving students well, is in the process of improving and should be given more time.

Unfortunately, the data does not support the claim that the school is effectively serving its students, improving, or that delaying phase-out would lead to significant improvements in student achievement at P.S. 230. The overall Progress Report score for P.S. 230 has remained low and/or declined for each of the past four years. As compared to the 2010-2011 Progress Report, the most recent 2011-2012 Progress Report indicates declines in the overall letter grade the school received across all categories, and the school's proficiency scores and progress scores for both ELA and Math dropped significantly.

Comment 2d focused on the impact of staff and principal turnover on student achievement at P.S. 230.

The DOE acknowledges the influence that staff and principal turnover can have on student achievement. At the same time, it is important to note that high amounts of staff and principal turnover can also be a reflection of the school environment and school culture, and should not necessarily be the basis for keeping a school open.

Tellingly, the data presented by the SLT omitted specific references to the 2011-2012 school year, the performance results of which are included in the latest Progress Report. In 2011-2012, only four of the teachers at P.S. 230 were new to the school and the school leader had been in place for over four years. However, P.S. 230's Progress Report grade declined from a C to an F. This suggests that staff and principal turnover at P.S. 230 are not a central cause of the school's ongoing struggle with student performance.

Comments 2c, 7, 11, 13, 15, 17, 18 all identify the X229 building design and classroom layout as the primary obstacles to student learning.

The DOE acknowledges that the building layout of X229 is unique in the sense that many of the classrooms in the building are designed as open spaces.

At the same time, the data does not support the claim that the building layout is a primary cause of the school's ongoing struggles with performance. P.S. 230 has been in the X229 building for

over ten years, during which time the school’s performance has ranged from an overall “A” to an overall “F” on the Progress Report. As a result, the building design and classroom layout are not insurmountable obstacles to student achievement.

The performance of students at I.S. 229 Roland Patterson (09X229), which is co-located in X229, is also worth noting. I.S. 229 has received an overall “A” or “B” grade on its Progress Report for each of the past six years. The school operates in the same types of spaces as P.S. 230 and yet students at I.S. 229 have had significantly higher levels of achievement and growth.

As a result, the data does not support the claim that the ongoing struggles at P.S. 230 are simply a product of the building’s design and classroom layout.

Comments 3, 23, and 24 inquire as to why Option 1 wasn’t chosen as an alternative to phase out.

When a school is identified as a struggling school and selected for early engagement, the DOE engages in a multi-faceted and comprehensive investigation process. One potential intervention discussed during the early engagement process, which the commenter refers to as “Option 1,” is the creation of an action plan based on feedback from staff members and SLT members that would be implemented in an attempt to significantly improve student performance.

When considering whether a struggling school should be investigated as a candidate for more serious intervention, such as phase-out, 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. Network Leaders and Superintendents looked at a wide range of school attributes, including:

- Leadership capacity;
- Teacher effectiveness;
- School environment;
- Support for students and families; and
- Interventions already underway at the school.

At the end of this multi-step process, our analysis and engagement indicates that an intervention like implementing an action plan will not adequately lead to improvement at P.S. 230, and that phase-out and replacement is the appropriate strategy for creating better educational options for the community.

Comments 4, 21, and 22 include general opposition to the phase-out proposal.

While many commenters generally felt that phasing-out schools does not lead to improvements in student outcomes, the available data suggests that this strategy has been and continues to be an effective approach to boosting student achievement.

To ensure that as many students as possible have access to the best possible education, under this Administration, New York City has replaced 142 of our lowest-performing schools with better options and opened 576 new schools: 427 district schools and 149 public charter schools.

As indicated in the table below, in each of the past three years the percentage of students in grades three, four, and five who meet or exceed NYSED achievement standards on the English Language Arts (“ELA”) and Math exams at new schools has significantly exceeded the percentage of students meeting or exceeding achievement standards at schools that have been approved for phase-out.

**ELA:**

<b>Percentage of third-grade students at Levels 3 or 4 on NYSED ELA exam</b>			
	2010	2011	2012
New Schools	34.5	36.1	45.3
Phase-out Schools	27	23.7	25.1

<b>Percentage of fourth-grade students at Levels 3 or 4 NYSED on ELA exam</b>			
	2010	2011	2012
New Schools	35.2	42.2	39.9
Phase-out Schools	22.4	29.2	26.4

<b>Percentage of fifth-grade students at Levels 3 or 4 on NYSED ELA exam</b>			
	2010	2011	2012
New Schools	38.2	45.8	44.1
Phase-out Schools	23.2	24	27.6

**Math:**

<b>Percentage of third-grade students at Levels 3 or 4 on NYSED Math exam</b>			
	2010	2011	2012
New Schools	39.9	41.2	52.3
Phase-out Schools	28.9	27.1	24

<b>Percentage of fourth-grade students at Levels 3 or 4 on NYSED Math exam</b>			
--	--	--	--

	2010	2011	2012
New Schools	43.6	46.2	52.8
Phase-out Schools	29.7	34.6	35

<b>Percentage of fifth-grade students at Levels 3 or 4 on NYSED Math exam</b>			
	2010	2011	2012
New Schools	48.6	59	54.4
Phase-out Schools	29.8	33.8	36.3

As a result, the data supports the DOE’s belief that phasing-out and replacing underperforming schools can and does lead to significant improvements in student achievement.

Comments 5 and 10 contend that teachers are not involved in shaping educational policy under the current mayoral administration, and suggest that mayoral control has contributed to the decline of student performance at schools like P.S. 230. These commenters also suggest that it should be the individuals who shape educational policy that are held responsible for schools’ performance struggles.

In shaping and implementing educational policies, the DOE works with individuals who possess a wide variety of experience and expertise, including educators.

The claim that mayoral control has led to a decline in student achievement is not supported by the data. Please refer to the response to comments 4, 21, and 22 above, which indicates that student performance at new elementary schools (which includes all schools that were opened after mayoral control began) is significantly higher than student performance at schools that were approved for phase-out under this administration.

These gains have also translated to higher graduation rates. The first high school cohort that began school after mayoral control began is the 2002 cohort, which had a 4-year graduation rate of 49.1%. The most recent cohort for which graduation data is available, the 2007 cohort, had a 4-year graduation rate of 65.5%.

As a result, the data does not support the claim that mayoral control of the New York City public school system has had a negative effect on student performance.

Comment 6 contends that phase-outs may violate federal law.

The DOE’s efforts to close struggling schools and replace them with better options for students are in keeping with federal initiatives for turning around low-achieving schools, and consistent with all applicable laws and regulations.

In fact, the DOE has successfully received federal Title I School Improvement Grant funding in support of phasing out low-achieving school and bringing in new and better ones under the Turnaround Model.

Comments 9, 10, 14, 19 express concern that phase-outs have a negative social, emotional, and psychological impact on students.

The DOE recognizes that phasing out and closing a school is a difficult experience for students, staff, and community members.

If this phase out proposal is approved, P.S. 230 will receive support in the areas of budget, staffing, programming, community engagement, guidance, and enrollment including, but not limited to:

- Helping the school provide students with options that support their advancement and fully prepare students for their next transition point.
- Working with school staff to foster a positive culture.
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

In September 2013, the DOE will continue to provide differentiated and deliberate supports to P.S. 230 students.

It is important to note that decisions around the future of a school in no way reflect on the students who attend the school. We, rather than students, are responsible for the quality of a school. Whenever we make the decision to move forward with a proposal to phase out a school, we do so because students deserve a better option.

Comment 10 suggests that the federal government should intervene to improve the school as an alternative to DOE-driven phase-out.

The DOE's efforts to improve student performance are made in collaboration with the federal government. As noted in the response to comment 6 above, the DOE's decision to close struggling schools and replace them with better options for students has been supported by federal education initiatives and by federal funding.

Comment 15 attributes P.S. 230's performance struggles to the District 9 superintendent.

It is also worth noting that P.S. 230 is supported by the same Superintendent as all other District 9 elementary and middle schools. As detailed in the response to comments 1b and 6, P.S. 230 is in the same peer index group as a number of District 9 schools that have far higher scores on student performance and progress metrics. With this in mind, there is little support for the claim that ongoing struggles with student performance at P.S. 230 are simply a reflection of the Superintendent.

Comment 27 asked if re-zoning had been considered as an alternative to phase-out.

The DOE does not feel that re-zoning P.S. 230 is a viable alternative for improving the school. To the extent that the commenter suggests that re-zoning would permit P.S. 230 to serve fewer students with high needs and perform better, the data undermines this argument.

As described above in the response to comments 1b and 6, other schools serving similar populations of students serve those students better. Thus, the composition of the student body at P.S. 230 should not necessarily be an obstacle to student achievement and growth.

Comment 28 expressed concern that phasing-out P.S. 230 would contribute to unemployment.

As noted in the EIS, if this proposal is approved, all teachers, administrative, and non-pedagogical staff at P.S. 230 will be excessed over the course of the phase-out.

Barring system-wide layoffs, excessed teachers will be eligible to apply for other City positions, and any teachers who did not find a permanent position will be placed in the ATR pool, meaning that they will continue to earn their salary while serving as substitute teachers in other City schools.

Students who would otherwise have enrolled in P.S. 230 may now enroll in 09X274 which the DOE has proposed to phase into the X229 building, or in other new schools opening borough-wide, and those schools might need to hire additional staff. 09X274 would follow a hiring process consistent with the procedures set forth in the collective bargaining agreement between the DOE and UFT, and hire no less than 50% of their staff from the most senior qualified staff from P.S. 230, if sufficient number of staff apply, until the impacted school has completed its phase-out.

New staff positions will also be created due to the phase-in of new or replacement schools Citywide. Consequently, this proposal will not necessarily result in an overall loss of teaching positions within the Citywide system.

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

No changes have been made to the proposal.