



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

Date: March 8, 2013  
Topic: The Proposed Phase Out of P.S. 174 Dumont (19K174) Beginning in 2013-2014  
Date of Panel Vote: March 11, 2013

---

### **Summary of Proposal**

On January 22, 2013, the New York City Department of Education (“DOE”) posted an Educational Impact Statement (“EIS”) proposing to phase out P.S. 174 Dumont (19K174, “P.S. 174”), an existing district school in building K174 (“K174”) located at 574 Dumont Avenue, Brooklyn, NY 11207, in Community School District 19 (“District 19”). It currently serves students in grades kindergarten through eight. P.S. 174 currently offers a full-day pre-kindergarten program. The DOE is proposing to phase out P.S. 174 based on its poor performance and the DOE’s assessment that the school lacks the capacity to improve quickly to better support student needs. On January 31, 2013, the EIS describing the proposed phase out of P.S. 174 was amended to include P.S. 174’s most recent Quality Review, which occurred on October 24, 2012 and October 25, 2012.

In a separate amended EIS also posted on January 31, 2013, the DOE is proposing to co-locate a new elementary school (19K557, “New Elementary School”) and a new middle school (19K663, “New Middle School”) in building K174. That proposal can be found here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.html>.

P.S. 174 currently offers a full-day pre-kindergarten program and serves zoned kindergarten through fifth-grade students, and sixth- through eighth-grade students who are admitted through the District 19 Middle School Choice Process, in which priority is given to continuing fifth-grade students and then to District 19 students using an unscreened admissions method. Unscreended schools randomly select students who apply for admission. Additional information about the District 19 Middle School Choice Process and P.S. 174 admissions is provided in Section III.A of this proposal.

If this proposal is approved, P.S. 174 will be phased out gradually over the next several years and will no longer admit new kindergarten, first-grade, second-grade, or sixth-grade students at the end of this school year. Additionally, at the end of this school year, P.S. 174 will not offer its pre-kindergarten program. In 2013-2014, P.S. 174 will only serve students in third, fourth, fifth, seventh, and eighth grades; in 2014-2015, P.S. 174 will only serve students in fourth, fifth, and eighth grades; in 2015-2016, P.S. 174 will only serve students in fifth grade. P.S. 174 will close in June 2016.

---

<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. Those additional comments will be addressed in an amended Public Comment Analysis which will be provided to the PEP before it votes on this proposal.

In a separate amended EIS posted on January 31, 2013, the DOE has also proposed to open New Elementary School and New Middle School in the same building next September. The proposal can be found at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.html>. New Elementary School will serve kindergarten, first, and second grades next year and will add one grade per year over the next three years. New Elementary School will also offer pre-kindergarten. Current P.S. 174 kindergarten and first-grade students will be enrolled in New Elementary School next year. Current P.S. 174 pre-kindergarten students will have priority for admissions at New Elementary School next year. At full scale, New Elementary School will serve students in kindergarten through fifth grades in 2016-2017 and offer a pre-kindergarten program. New Middle School will serve sixth grade when it opens and will add one grade per year over the next two years. Current P.S. 174 fifth-grade students will be given priority for admissions at New Middle School next year only. At full scale, New Middle School will serve students in sixth through eighth grades in 2015-2016. P.S. 174 is the only school organization in building K174.

The details of this proposal have been released in an amended EIS which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.html>. Copies of the EIS are also available in P.S. 174's main office.

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

A joint public hearing regarding this proposal was held at building K174 on February 22, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 90 members of the public attended the hearing and 12 people spoke. Present at the meeting were: Deputy Chancellor Kathleen Grimm; Principal Ingrid Mason; P.S. 174 School Leadership Team ("SLT") Representatives Colleen Parks and Anita Brown; District 19 Community Superintendent Joyce Stallings-Harte; Chief of Staff Joy Simmons on behalf of Councilmember Charles Barron; and Representatives from the DOE's Division of Portfolio Planning, Lily Haskins and Gabrielle Wyatt. The District 19 Community Education Council ("CEC 19") was invited to attend and confirmed that a representative would be in attendance; however, no representative attended the hearing.

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

1. Colleen Parks, representative from the SLT, stated the following:
  - a. The DOE says P.S. 174 is a struggling school that cannot turnaround quickly; we disagree.
  - b. When Principal Mason began at P.S. 174, only 18% of students were on grade level. Now we are at 50% proficiency.
  - c. P.S. 174 had the second highest gain in the district in 2010-2011.
  - d. P.S. 174 has been a well-developed school consistently.
  - e. We are being identified as a Focus school based on one year of data.
  - f. We are doing everything we can to move these students, including adopting the Common Core, implementing the Danielson Framework, and using benchmark assessments throughout the year.
  - g. The DOE has not given us any help over the last 10 years. Instead, the DOE has taken away our funding and programming. We have to seek out these things on our own.
  - h. Our Quality Review appeal was denied this year because the DOE says we do not have a system to communicate with parents; however, we communicate in several ways to parents.
  - i. Why is our phase out based on one year of data?
2. Anita Brown, representative from the SLT, stated the following:
  - a. The phase out is unfair and unjust.
  - b. The DOE promised to help us stay afloat during early engagement. The DOE promised they would give us a projected program.

- c. We've been a well-developed school every year and the one year we are not, we're phased out.
  - d. We have a lot of great programs because of Principal Mason, not the DOE who did not give us funding.
  - e. P.S. 174 has been a good standing school for many years. How can the DOE phase us out?
  - f. The Quality Review appeal was denied; however, the Quality Review was inaccurate because we do a lot with our parents.
  - g. Why shut down a system that is working well?
  - h. It is unfair to phase out a school because of one letter grade.
  - i. The DOE wants to bring in another school and take away funding from us.
  - j. We want funding for after school programs and tutoring.
  - k. What can the new school do that we're not doing now? The new school will not change the outcome.
  - l. Principal Mason is doing very well. Let her continue.
  - m. We have students with special needs here and with the new tests, our scores dropped.
  - n. Other schools have been allowed time to improve, give us the chance.
3. Chief of Staff Joy Simmons, on behalf of Councilmember Charles Barron, stated the following:
- a. Charles Barron is on the side of parents and teachers who speak in favor of keeping P.S. 174 together.
  - b. The DOE cannot convince intelligent people that phase out is the right decision. A good school takes resources, labs, technology, a culturally relevant curriculum, and highly trained teachers. We have that here.
  - c. Our office has had successes when parents organize. We need organized action in order to stop this decision.
- 4. Multiple commenters stated P.S. 174 is not failing and doing the best it can.
  - 5. Several commenters stated there is a lack of parent involvement at P.S. 174 and that is why the school is underperforming.
  - 6. Several commenters stated disappointment in the lack of community members attending the hearing.
  - 7. Several commenters stated more programs should be placed in the school rather than phasing out P.S. 174.
  - 8. Several commenters expressed appreciation for P.S. 174's staff, including the school's leadership, and questioned the DOE's decision to phase out the school.
  - 9. Several commenters were uncertain about the replacement plan for P.S. 174 and what happens to currently enrolled students.
  - 10. Several commenters stated students come from low income and displaced homes in East New York; therefore it is unfair for the DOE to compare P.S. 174 to other schools.
  - 11. One commenter stated it was unfair to replace P.S. 174 with a charter school.
  - 12. One commenter stated it was unfair for the DOE to take funding away from P.S. 174 and give to the new schools.
  - 13. Several commenters stated the DOE underfunds P.S. 174 and asked for funding to be restored.
  - 14. Several commenters questioned whether the new schools would make a difference.
  - 15. One commenter stated there is no criteria for phasing out schools.
  - 16. One commenter stated P.S. 174's 92% attendance rate is an indicator the school can quickly turnaround.

**The DOE received a number of comments at the joint public hearing which do not directly relate to the proposal, and therefore will not be addressed. Those comments are summarized below.**

- 17. Anita Brown, representative from the SLT, stated the process is a political ploy.
- 18. Chief of Staff Joy Simmons, on behalf of Councilmember Charles Barron, stated Mayor Bloomberg is about the bottom line, not students. The administration is playing games across the City.

19. One commenter stated the Bloomberg administration warehouses students in low performing schools.

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

20. The DOE received several written comments about how P.S. 174 teachers are hardworking and devoted.
21. The DOE received several written and oral comments stating P.S. 174 should be given another chance.
22. The DOE received multiple written and oral comments stating phasing out P.S. 174 will not solve any problems.
23. The DOE received several written and oral comments stating that when the DOE cut funding to P.S. 174, performance declined. The DOE should restore P.S. 174's funding and resources.
24. The DOE received a written comment stating the DOE should not privatize P.S. 174.
25. The DOE received an oral comment stating the DOE should bring back the theater program at P.S. 174.
26. The DOE received several written and oral comments stating P.S. 174 should not be closed.
27. The DOE received an oral comment stating there should be a leadership change at P.S. 174 rather than the proposed phase out.
28. The DOE received an oral comment requesting that the DOE not replace P.S. 174 with a charter school.

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

Comments 9, 11, 24, and 28 concern the proposed replacement of P.S. 174 and is addressed in the corresponding public comment analysis.

Comments 1 (a, i), 2 (e, g, h), 3 (b), 4, and 15 concern the criteria used by the DOE when proposing the phase out of P.S. 174.

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

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

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

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

- Elementary and middle schools that have a higher English Language Arts and Math average proficiency than their district average or the city average (whichever is lower). The city average for 2011-12 is 53.5% proficient; and/or

- High Schools that have a higher graduation rate than the citywide graduation rate. The citywide rate for 2010-2011<sup>2</sup> is 65.5%; and/or
- Schools that received an A or B on the 2011-12 Progress Report; and/or
- Schools that earned a Well Developed score on a 2010-11 or 2011-12 Quality Review; and/or
- Schools receiving a Progress Report Grade for the first time in 2011-12.

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

We identify the remaining schools as struggling schools. These schools will undergo strategic action planning. These plans will identify concrete action steps, benchmarks, and year-end goals aimed at immediately improving student achievement. This plan will outline the specific support the network will provide to the school to address the most urgent areas of need, including:

- Leadership coaching;
- Professional development on instructional strategies for struggling students;
- Identifying grants aimed at specific needs of the school;
- Introducing new programs;
- Supporting the development of a smaller learning environment; and
- Possible leadership change.

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

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

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

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

No single factor determines whether a school will phase out or not. Deciding to phase out a school is the toughest decision we make. But it is the right thing to do for the students of New York City. P.S. 174 is a

---

<sup>2</sup> 2011-2012 Citywide graduation rate is not available yet.

school that the DOE has determines warrants this intervention. As noted in the EIS proposing to phase out P.S. 174:

- The overwhelming majority of P.S. 174 students remain below grade level in English Language Arts (“ELA”) and Math. Only 22% of students were performing on grade level in ELA—putting the school in the bottom 6% of K-8 schools Citywide. Only 25% of students were performing on grade level in Math—putting the school in the bottom 3% of K-8 schools Citywide.
- The Progress Report measures the progress and performance of students in a school, as well as the school environment, compared to other schools serving similar student populations. P.S. 174 earned a D grade on its 2011-2012 annual Progress Report.<sup>3</sup> Although P.S. 174 earned a B grade for School Environment, it received an F grade for Student Progress and a D grade for Student Performance. P.S. 174 has a history of low performance, including a D grade on the Progress Report in 2011-2012, a C grade in 2010-2011, and a C grade in 2009-2010.
- P.S. 174 was designated a Focus School, indicating that it is among the lowest-performing schools statewide in terms of overall proficiency and progress in ELA and math, and especially in terms of the performance of students in one or more accountability groups (i.e. racial/ethnic groups, English language learners, low-income students, and students with disabilities).
- P.S. 174 was rated “Under Developed” on its most recent Quality Review in 2012-2013, indicating deficiencies in the way that the school is organized to support student learning.
- Demand for P.S. 174 is low. P.S. 174 is a zoned school for the elementary grades, but only 48% of elementary students residing in the P.S. 174 zone chose to attend the school in 2011-2012, suggesting that families are seeking better options.

For these reasons, the DOE believes that P.S. 174 lacks the capacity to turnaround quickly to better serve its students and, therefore, future investments in the students in District 19 can be better leveraged for student achievement through a new school organization.

Comments 1 (b, c) and 16 reference multiple data points as evidence that P.S. 174 is not underperforming and should not be phased out.

Comment 1 (b) states 50% of P.S. 174 students are on grade level. The DOE notes that this is inaccurate; 22% of students were performing on grade level in ELA and only 25% of students were performing on grade level in Math in 2011-2012.

Comment 1 (c) states P.S. 174 had the second highest gain in the district in 2010-2011. The DOE notes that in 2010-2011, only 27% of students at P.S. 174 were performing on grade level in ELA. Although this placed P.S. 174 in the 75<sup>th</sup> percentile of K-8 schools in District 19 in terms of ELA progress, P.S. 174 fell into the 44<sup>th</sup> percentile of K-8 schools Citywide. Similarly, only 28% of students at P.S. 174 were performing on grade level in Math, also placing P.S. 174 in the 75<sup>th</sup> percentile of K-8 schools in District 19 in terms of Math progress, but in the bottom 14% of K-8 schools Citywide.

Comment 16 notes that P.S. 174’s 92% attendance rate is an indicator that the school can quickly turnaround. The commenter is accurate that P.S. 174’s attendance rate was 92% in 2011-2012; however, as stated previously, the decision to phase a school out is the result of many factors and does not rely on any one single data point. As noted previously, the DOE has 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 the review, the DOE believes that only the most serious intervention – the gradual phase-out and eventual closure of P.S.

---

<sup>3</sup> For more information about Progress Reports, please visit the DOE’s Web site: <http://schools.nyc.gov/Accountability/tools/report/default.htm>.

174 – will address the school’s performance struggles and allow for a new school option to develop in K174 that the DOE believes will better serve future students and the broader community.

Comments 1 (d, h) and 2 (c, f) reference the Quality Review ratings received by P.S. 174 and question the appeals process for P.S. 174’s most recent Quality Review.

In 2006-2007, 2007-2008, and 2009-2010, P.S. 174 received “well-developed” ratings on Quality Reviews. In October 2012, P.S. 174 received the rating of “under developed.” The Quality Review rating was appealed by P.S. 174. The request was reviewed by the DOE and was denied.

The comments state P.S. 174 received an “under developed” rating due to low parent engagement. This is inaccurate, as P.S. 174 received a “developing” rating for establishing a culture of learning that communicates high expectations to and provides supports for families. That Quality Review can be found here: [http://print.nycenet.edu/OA/SchoolReports/2012-13/Quality\\_Review\\_2013\\_K174.pdf](http://print.nycenet.edu/OA/SchoolReports/2012-13/Quality_Review_2013_K174.pdf).

The DOE again notes that the proposed phase out of P.S. 174 is based on a multitude of factors, not a single Quality Review rating.

Comment 1 (e) states P.S. 174 has been identified as a Focus school because of one year of data.

The commenter is accurate that P.S. 174 was identified by SED as a Focus school. Focus schools are schools within each borough that met one or more of the following criteria in 2010-2011: 1) bottom 5% of the SED Performance Index and/or graduation rate for the performance of at least one accountability group and not making progress; or 2) had the highest number of non-proficient results in ELA or math or non-graduate results or the highest percentages of such results within a district; or 3) were low-performing in the district or borough according to the SED Performance Index and/or graduation rate and the 2010-2011 NYC Progress Report.

As noted previously, the DOE has 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 the review, the DOE believes that only the most serious intervention – the gradual phase-out and eventual closure of P.S. 174 – will address the school’s performance struggles.

Comment 1 (f) states current efforts by P.S. 174 to improve student achievement.

At the end of the multi-step process discussed previously, the DOE’s analysis and engagement directed us to quantitative and qualitative indicators that demonstrate P.S. 174 does not have the capacity to improve quickly to better serve its students. Deciding what course of action can best support the students and community of a struggling school is not easy, but we are compelled to act based on our commitment to ensuring that every student has access to high-quality schools.

Comments 2 (a) and 3 (a) state general opposition to the proposal.

While some members of the P.S. 174 community object to the possibility of phasing out the school, the DOE is committed to providing a portfolio of high quality school options to students and families. The DOE believes that phasing out and replacing P.S. 174 is the best option for future students and the broader community.

While some members of the P.S. 174 community objected to the possibility of phasing out the school, the DOE believes that drastic action must be taken, given the school’s performance struggles and the lack of

evidence that the school is poised to quickly improve to better support students. The DOE plans to incorporate community feedback as it continues to support current P.S. 174 students working toward elementary school completion, and develops plans to replace P.S. 174 with a new school that the DOE believes will better meets student and community needs.

Comment 2 (b) concerns supports provided by the DOE when schools are identified for early engagement.

Because P.S. 174 was identified as a struggling school, like all struggling schools, P.S. 174 will undergo strategic action planning. These plans will identify concrete action steps, benchmarks, and year-end goals aimed at immediately improving student achievement. This plan will outline the specific support the network will provide to the school to address the most urgent areas of need, including:

- Leadership coaching;
- Professional development on instructional strategies for struggling students;
- Identifying grants aimed at specific needs of the school;
- Introducing new programs; and
- Supporting the development of a smaller learning environment.

As stated in the EIS, to help the school's efforts to improve performance, the DOE offered numerous supports, including:

**Leadership Support:**

- Supporting school leadership in aligning curriculum to Citywide instructional expectations to raise standards for teacher practice and student learning.
- Coaching the principal and assistant principals in the use of classroom observations and feedback to enhance teacher effectiveness.
- Coaching the principal and assistant principals on utilizing accountability data to identify areas in need of improvement and developing goals to strengthen school-wide performance.

**Instructional Support:**

- Training teachers to use data tools and data analysis to identify student learning trends, set goals, and differentiate instruction to increase student achievement.
- Providing professional development for teachers to enhance the use of rubrics and curriculum maps to outline clear expectations for student work.

**Operational Support:**

- Advising school staff on budgeting, human resources, staff recruitment, and building management.
- Assisting the school in the planning and operation of its summer school program.

**Student Support:**

- Facilitating workshops for school staff focused on difficult behavior patterns and youth development issues such as gang violence, in order to foster awareness and improve the school's culture and learning environment.
- Coaching the school in evidence-based guidance and counseling strategies to build the school's capacity to offer social and emotional support to students.

- Working with the school to plan strategies to reduce suspensions and re-integrate suspended students back into the school community.

P.S. 174 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.

Comment 2 (d) states the school has great programs and partnerships because of the school leader, not because the DOE provided funding.

School leadership, while very important, is only one component of a school. Similarly, partnerships and after-school programming are a component of a school. While members of the P.S. 174 community have worked hard to improve student outcomes at P.S. 174, the school culture and conditions have not enabled increased achievement. As stated previously, to help the school's efforts to improve performance, the DOE has offered numerous supports to P.S. 174. It is our belief that phasing out this school and bringing in higher quality schools will provide better options for the community and families in the future.

Comments 2 (i) and 12 concern the funding of schools as they phase out and replacement schools phase in.

As stated in the EIS, If this proposal is approved, once the phase-out of P.S. 174 is fully implemented, the DOE would cease to allocate funds to P.S. 174 and repurpose all remaining funds previously allocated to the school.

Most funding in schools' budgets is allocated on a per-pupil basis, based on current Fair Student Funding ("FSF") per capita allocation levels, which are subject to annual variation. FSF covers basic instructional expenses and FSF funds may, at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs.

As a result of the phase-out, the total number of students enrolled at P.S. 174 will decline each year, meaning that the school's budget will decrease each year, and the school will need fewer teachers and fewer supplies to meet the needs of its smaller student population. If for some reason the overall school enrollment grows again, the overall budget will increase accordingly. In any case, funding will be provided in accordance with enrollment levels, allowing the school to meet the instructional needs of its student population. This is how funding is awarded to all schools throughout the City, with budgets naturally increasing or decreasing as enrollment fluctuates from year to year.

Please refer to the FSF Guide and FY13 School Allocation Memoranda for additional information on cost of instruction and how the changes to FSF funding and other school allocations will be impacted as a result of register changes at P.S. 174. The FSF Guide is available at: [http://schools.nyc.gov/offices/d\\_chanc\\_oper/budget/dbor/allocationmemo/fy12\\_13/FY13\\_PDF/FSF\\_Guide.pdf](http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy12_13/FY13_PDF/FSF_Guide.pdf). The FY13 School Allocation Memoranda is available at: [http://schools.nyc.gov/offices/d\\_chanc\\_oper/budget/dbor/allocationmemo/fy12\\_13/AM\\_FY13\\_CAT.html](http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy12_13/AM_FY13_CAT.html) Staffing changes are at the discretion of the school within the limits of contractual and mandated obligations.

New schools receive Fair Student Funding in the same manner as other schools. Funding follows the students and is based on pupil academic needs (i.e., special education, ELL, poverty, and/or proficiency status). New district schools are provided with additional funds to cover start-up costs such as supplies and textbooks that may be required. This Other than Personal Services (OTPS) for new schools funding

allocation is based on a fixed per-school amount, and a per-pupil allocation. A new school in year one of implementation at a newly constructed site will receive \$22,000 and a new school in a newly leased or existing site will receive \$51,000 in OTPS per school. Thereafter, the school will receive \$100 per-student in OTPS based on projected registers for the newly added grade. In the case where there is no new grade phasing-in, the school will not receive an allocation in that year.

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

Comments 2 (j), 7, and 25 request additional funding for more programming at P.S. 174.

As stated previously, in New York City, we fund schools through a per pupil allocation. That is, funding “follows” the students and is weighted based on students’ grade level and need (incoming proficiency level and special education/ELL/Title I status). Principals have discretion over their budget and make choices about how to prioritize their resources, including programming.

Furthermore, as stated previously, the DOE has offered numerous supports to P.S. 174. It is our belief that phasing out this school and bringing in higher quality schools will provide better options for the community and families in the future.

Comment 1(g) asserts P.S. 174 has not received support from the DOE and that funding and programming have decreased.

As stated above, the DOE has offered numerous supports to P.S. 174. The DOE also notes that all schools receive support and assistance from their respective superintendents and Children First Networks. The Children First Network is a team that delivers operational and instructional support directly to schools. The Children First Network and DOE does everything it can to provide schools with leadership, operational, instructional, and student supports. As stated previously, principals have discretion over their budget and make choices about how to prioritize their resources, such as technology.

The DOE acknowledges that budget cuts have impacted schools across the City, but budget cuts have not disproportionately impacted schools. For example, in 2010-2011, individual school budgets Citywide were cut by an average of 4%. It should be noted that principals have discretion over their budget and make choices about how to prioritize their resources. Principals have discretion over their budget and make choices about how to prioritize their resources, including programming.

Comment 13 states P.S. 174 is underfunded and its budget should be restored.

The DOE acknowledges that budget cuts have impacted schools across the City, but budget cuts have not disproportionately impacted schools. For example, in 2010-2011, individual school budgets Citywide were cut by an average of 4%. It should be noted that principals have discretion over their budget and make choices about how to prioritize their resources.

Comments 2 (k) and 14 question whether the new schools will perform better than P.S. 174.

The DOE believes that closing a struggling school and opening a new school with new leaders and staff is a successful strategy to provide all students with an excellent education. 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 districts schools and 149 public charter schools. The new schools have out performed schools in phase out

both in ELA and Math in grades three through eight by wide margins. In ELA, new schools had 14.2 percentage points higher proficiency than schools in phase out, with 37.7% proficient in new schools and only 23.5% in schools in phase out in 2012. In Math, new schools had 23.2 percentage points higher proficiency than schools in phase out, with 50.8% proficient in new schools and only 27.6% in schools in phase out in 2012.

Comments 2 (l), 8, and 20 state current staff at P.S. 174, especially the school leader, are hard working and should be given more time.

While members of the P.S. 174 school community, including the leader, have worked hard to improve P.S. 174, the school culture and conditions have not enabled increased student achievement. Staff members have worked hard to improve P.S. 174, but even with support the school has not produced adequate outcomes for students. As stated previously, to help the school's efforts to improve performance, the DOE has offered numerous supports to P.S. 174. It is our belief that phasing out this school and bringing in higher quality schools will provide better options for the community and families in the future.

Comments 2 (m) and 10 describe P.S. 174's student population, stating that as a high needs school it should not be compared to other schools.

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. For high schools, each school has up to 40 peer schools, up to 20 schools with peer index immediately above it and up to 20 with peer index immediately below it. Thus, P.S. 174 is grouped in its peer group with other New York City public schools with similar student academic and demographic background.

Poor performance report grades thus indicate that a school is not serving its students well, both objectively and by comparison to other schools serving similar students. Moreover, the new schools proposed to open are anticipated to serve student populations similar to the phasing out school.

Comments 2(n) and 21 request P.S. 174 is given more time to improve.

As stated previously, after a multi-faceted quantitative and qualitative assessment of P.S. 174, the DOE has determined there is a lack of capacity to turn around P.S. 174 quickly to better serve its student population. The DOE recommends the most serious intervention: gradually phasing out P.S. 174 over time by no longer enrolling new students.

Comment 3 (c) states parents should organize in order to stop the decision.

The DOE appreciates all feedback from the community regarding a proposal. When the EISs were issued, they are made available to the staff, faculty and parents at P.S. 174, on the DOE's Web site, and in each school's respective main office. In addition, the DOE dedicates a proposal-specific website and voicemail to collect feedback on this proposal. Furthermore, the school's staff, faculty and parent communities are invited to the Joint Public Hearing to provide further feedback.

Comment 5 states that P.S. 174 is underperforming due to the lack of parent involvement.

As stated previously, the decision to phase out a school is not the result of one single factor or data point. During a comprehensive review of P.S. 174, the DOE determined that the school lacks the capacity to quickly turn around.

Comment 6 states disappointment in the lack of community members in attendance at the joint public hearing.

As noted previously, the school's staff, faculty and parent communities were invited to the Joint Public Hearing to provide further feedback.

Comment 22 asserts the strategy of phasing out schools does not work.

The central goal of the Children First reforms is simple: 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, 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 a result, we've created more high-quality choices for families. ELA and math proficiency levels at new schools are higher than the schools they replaced. As stated above, the new schools have outperformed schools in phase out both in ELA and Math in grades three through eight by wide margins.

Our new schools are overwhelmingly getting the job done for students, and when they are not, and a school is struggling, we follow the same process to phase out and replace that school.

Comment 23 states P.S. 174 has declined in performance because the DOE cut funding to the school.

As noted previously, the DOE acknowledges that budget cuts have impacted schools across the City, but budget cuts have not disproportionately impacted schools. Principals have discretion over their budget and make choices about how to prioritize their resources, including programming.

The DOE also notes that all schools receive support and assistance from their respective superintendents and Children First Networks. The Children First Network is a team that delivers operational and instructional support directly to schools. The Children First Network and DOE does everything it can to provide schools with leadership, operational, instructional, and student supports. As stated previously, principals have discretion over their budget and make choices about how to prioritize their resources, such as technology.

Comment 26 states opposition to the closure of P.S. 174.

The DOE notes that that P.S. 174 is proposed for phase out, not closure. If the proposal is approved, it will be phased out over several years, beginning in 2012-2013.

Comment 27 suggests a leadership change at P.S. 174 instead of the proposed phase out.

As stated previously, no single factor determines whether a school will phase out or not. Deciding to phase out a school is the toughest decision we make. But it is the right thing to do for the students of New York City. P.S. 174 is a school that the DOE has determined warrants this intervention. While many members of the P.S. 174 community have worked hard to improve the school, the school culture and conditions have not enabled increased student achievement. It is our belief that phasing out this school and bringing in higher quality schools will provide better options for the community and families in the future.

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

No changes have been made to this proposal.