



Public Comment Analysis

Date: April 27, 2011

Topic: The Proposed Phase-out of Pacific High School (15K520)

Date of Panel Vote: April 28, 2011

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to phase out and eventually close Pacific High School (15K520, “Pacific”), an existing transfer school, based on its poor performance and the DOE’s assessment that the school lacks the capacity to turn around quickly to better support student needs. Pacific is located in school building K520 (“K520”) located at 112 Schermerhorn Street, Brooklyn, NY 11201, within the geographical confines of Community School District 15 (“District 15”). Pacific currently enrolls students who are classified as tenth, eleventh and twelfth graders based on their credit accumulation. Pacific serves students who are 17 years of age and older and who have already completed at least one year of high school with a minimum of 10 academic credits. It has a rolling admissions policy, accepting students throughout the year.

If this proposal is approved, Pacific would no longer admit new students after the end of the 2010-2011 school year. Pacific would complete phasing out in June 2012. In June 2011, students who have earned at least 44 academic credits and those that pass, at a minimum, five Regents exams would graduate from Pacific. In 2011-2012, students would be supported as they progress towards graduation while remaining enrolled at Pacific. Students who meet all of their graduation requirements by the closure date would have the opportunity to graduate from Pacific. Students who do not meet all of their graduation requirements by June 2012 would be encouraged to meet with their guidance counselor to discuss their options. In cases where students do not complete graduation requirements by the closure date, the DOE will help students and families identify alternative programs, such as a Young Adult Borough Center (“YABC”) or another transfer school or program that meets students’ needs so that they may continue their education after Pacific completes its phase-out.

In the 2009-2010 school year, building K520 had a target capacity to serve 252 students, and the building enrolled 214 students, yielding a target building utilization rate of 85%. In 2010-2011, building K520 has an enrollment of 200 students which yields a building utilization rate of 79% of target capacity. This means that the building is “under-utilized” and has extra space to accommodate additional students.

In a separate Educational Impact Statement (“EIS”) posted on March 3, 2011, the DOE has also proposed to co-locate a new DOE school, Brooklyn Frontiers High School (15K423, “Brooklyn Frontiers”), in building K520 beginning in 2011-2012. If that proposal is approved, Brooklyn Frontiers would begin phasing into the building with a ninth-grade class during the 2011-2012 school year. In 2011-2012, when Brooklyn Frontiers and Pacific are co-located for a year, the building would serve approximately 160-231 students (combining the student bodies of both schools), which would yield an approximate building utilization rate of 92% of target capacity. The proposed new school would gradually grow to scale, as Pacific phases out, and would complete its expansion during the 2014-2015 school year, at which point it would serve students in grades 9-12. Brooklyn Frontiers would enroll students ages 15-16 who have been retained or held back two or more years in elementary or middle school and who are entering the ninth grade for the first time. The details of that proposal have been released in an EIS which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Apr282011Proposals>.

For more information about the phase-out proposal, please visit the DOE’s website at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Apr282011Proposals>. Copies of the EIS are also available in the main office of Pacific.

Summary of Comments Received at the Joint Public Hearing

A Joint Public Hearing regarding this proposal was held at K520 on April 12, 2011. At the hearing, interested parties had an opportunity to provide input on the proposal. Approximately 32 members of the public attended the hearing and 6 people spoke. Present at the meeting were: Chief Academic Officer Shael Polakow-Suransky; Staten Island/Brooklyn High Schools Superintendent Aimee Horowitz; Community School District 15 Superintendent Anita Skop; Community Education Council (“CEC”) 15 President Jim Devor; CEC 15 representative Mark Kolman; Pacific Principal Laurie Harriton; Pacific School Leadership Team (“SLT”) representative Laura Kramer; and Jenny Sobelman from the DOE Office of Public Affairs.

The proposal to co-locate Brooklyn Frontiers was also addressed at this hearing. The analysis of comments concerning the co-location proposal can be found at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Apr282011Proposals.htm>.

The following comments and remarks were made at the Joint Public Hearing:

1. A Pacific SLT representative stated that:
 - a. Thousands of students across generations have graduated from Pacific while she has been a teacher at the school, and that these students have gone on to succeed in various fields.
 - b. The school provides an opportunity for many students to connect with teachers with whom they can identify.
 - c. Despite the dire data on the school, students’ lives have been changed by attending the school.

- d. The school’s performance has deteriorated mainly because of low attendance rates, which is entirely uncontrollable.
 - e. The school should be evaluated on the fact that students’ lives have been changed in the classrooms—at least the lives of students who show up.
 - f. The school’s performance numbers are also negatively impacted by the fact that the school accepts all students—students rejected by other schools.
 2. A CEC representative stated that:
 - a. The CEC was not responsible for the decision to propose to phase out Pacific.
 - b. To the school’s credit, it has received a C on its most recent progress report, with an A in the School Environment section, and a Proficient score on its most recent Quality Review. These passing grades are significant when paired with the fact that the school works with students who have not succeeded in other areas. Additionally, the school must be doing something right if it has received such high grades in the school environment section.
 - c. The DOE wants to phase out and close this school because it would mean that the DOE has one less school on the State’s Persistently Lowest Achieving (“PLA”) schools list.
 - d. The DOE’s replacement school may become a PLA school in three years, but it will receive a grace period of three years before it can be put on that list.
 - e. Instead of actually helping schools, the DOE makes its statistics look better by closing poorly performing schools.
 - f. Pacific currently has the potential to become a better school; therefore, the DOE should allow the school to improve rather than closing it.
 3. A commenter stated that students who attend Pacific face different circumstances than students at other schools that Pacific is compared to. The statistics demonstrate that Pacific students are qualitatively different from those of other schools. The DOE should provide more guidance to the principals at Pacific and help it actually turn around instead of closing it and opening another school that will likely fail as well.
 4. A commenter stated that the summary of the proposal to phase out Pacific, as read by Shael Polakow-Suransky, was word-for-word the same summary as the one read by Deputy Chancellor Marc Sternberg at another phase-out hearing the commenter had attended earlier in the week, except that Pacific’s name was inserted into the summary.
 5. A commenter stated that the school’s faculty and staff have the capacity to turn the school around, as evidenced by the school’s most recent Quality Review score of Proficient, but the DOE has not provided sufficient support to the school. Additionally, the administration has blamed and attacked teachers instead of supporting the teachers. The DOE has not provided any meaningful or real support to Pacific staff members.
 6. Multiple commenters stated that the DOE does not support the school and that is evident through the fact that there has been high principal turnover in the past at the school—there have been five principals in the last four years.
 7. A commenter stated that the proposal is ill-advised considering the recent study released by the Urban Youth Collaborative that shows that closing schools causes drop-out rates at those schools to go up. Additional studies, like those regarding the closing of schools in Chicago, demonstrate that closing schools does not work and does not improve schools.
 8. Multiple commenters stated that the replacement school will fare significantly better than Pacific, and that Pacific should therefore be kept open and given more support. The

students at Pacific could succeed and Pacific could be a better school if it were given more resources and support. Pacific is doing good things.

9. Multiple commenters stated that the school is particularly disadvantaged by the fact that it takes in students who have very low Regents' test scores, unlike many other schools that will not let those students in—including other transfer schools. Pacific has to compete against those other schools and is measured against those schools.
10. A commenter stated that the school would have turned around a long time ago if it had received the support that it is currently receiving.
11. Multiple commenters stated that the school should not be closed because it offers a welcoming environment that allows students and teachers to bond. The positive atmosphere helps students succeed, and the teachers should not be blamed for the school's low performance or low attendance rates because the teachers are good at what they do.
12. A commenter asked what the school's most recent Joint Intervention Team ("JIT") review recommended, considering how quickly the DOE decided to phase out the school without using much data.
13. A commenter asked who is accountable for the high turnover rate of principals.
14. A commenter stated that the proposal should take into account that students who come in with a higher number of credits are actually more vulnerable to dropping out than students with fewer credits because they have been working to get through the system longer and are likely to be at a point where they are more discouraged about the process.
15. A commenter asked how Pacific compares to other transfer schools, and whether those schools are successful.
16. A commenter stated the proposal should take in account the leadership turnovers when interpreting the numbers and statistics that led to the decision to phase out Pacific.
17. A commenter stated the school should not be held accountable for attendance rates because attendance is outside the teachers' control. Rather, the school needs someone who can boost attendance.

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

18. A commenter asked why Pacific does not offer Career and Technical Education ("CTE") programs.
19. A CEC representative stated that Chancellor's Regulation A-190 was written by DOE officials, and that the regulation states that Joint Public Hearings on proposals that impact high schools should be held jointly with community school district CECs, even though CECs do not deal with high schools in their regular business.
20. A commenter stated that policymakers are taking chances with students by implementing charter schools. The political advantage of opening more charter schools will collapse once it is revealed that the charter schools are still leaving thousands of children uneducated. A more holistic approach should be taken by the DOE which should take into account the basic needs of all students. Even well performing DOE schools, like M.S. 223, which was profiled in the *New York Times Magazine*, have had space taken away from them to house charter schools. These schools have been denied the chance to expand to serve more students in more grade levels.

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

No written or oral comments were submitted to the DOE.

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

- With regard to comments 1(a), 1(b), 1(c), 1(e) and 11 related to the school's positive environment and individual student achievement: The DOE commends teachers at Pacific for supporting individual students and creating a positive and nurturing school culture. The DOE also notes that individual students who have graduated from the school have gone to achieve success and commends them for their achievements.

The DOE believes that phasing out Pacific and creating higher quality educational options in its place is the right thing to do for future students in the community and throughout New York City. The DOE also believes that if the proposal to phase in Brooklyn Frontiers in the building is approved, Brooklyn Frontiers would develop ties in the community and offer a welcoming environment for students as well.

- In response to comments 1(d), 11 and 17 suggesting that the school should not be held accountable for low student attendance rates: The DOE believes that regular attendance is fundamental to effective teaching and learning as well as creating and maintaining a positive school culture. Per Chancellor's Regulation A-210 and State minimum standards for school attendance, principals are responsible for planning and implementing an Attendance Plan that delineates the school's attendance program. Furthermore, the DOE has offered supports to Pacific around attendance issues, including assisting the school in the development of protocols to address lateness, monitor attendance daily, and facilitate phone messages, individual teacher calls or home visits to students who are late or absent. Despite those efforts, attendance at Pacific remains low. Pacific's average attendance declined by 6% from 2008-2009 to 2009-2010. The school's year-to-date average attendance as of April 23, 2011 is 63% according to the ATS report. This means that thus far on average only two-thirds of students on the school register attend on a regular basis.

With regard to comments 1(e), 2(b), 2(c), 2(d), 2(f), 3 and 5 concerning the DOE's decision-making process in connection with school phase-outs: The DOE takes into consideration multiple factors when it proposes a school for phase-out. Every year the DOE identifies which schools are having the most trouble serving their students. The Department compiles a preliminary set of schools that could possibly be considered for intensive support or intervention by looking at all schools that receive a grade of D, F, or a third consecutive C or lower on the Progress Report, and schools that receive a rating below Proficient on their most recent Quality Review. The Department also takes into account how the State assesses school performance, by including schools identified as Persistently Lowest Achieving ("PLA") in this first group. The criteria by which the State designates schools as PLA are published on the following website:

<http://www.p12.nysed.gov/irs/accountability/LowAchieve/2009/Methodology-IdentifyingPersistentlyLowestAchieveSchools.html>. In the case of transfer schools, the DOE considered additional data including enrollment trends and improvement strategies

already in place and their outcomes. With this smaller set of schools, the Department has in-depth conversations with school communities and networks to get an even better sense of what is happening at the school, and whether more significant action is needed. The Department continues to consider performance data, school culture, and demand information.

Pacific received a rating of Proficient in its two most recent Quality Reviews in 2007-2008 and 2008-2009. However, Pacific's most recent Quality Review from 2008-2009 cited a number of serious concerns, including inadequate differentiation of instruction to support individual student needs and insufficient attention to monitor student academic performance. Furthermore, Pacific received its third consistent failing grade in the Progress Report last year. The school earned an overall C grade in 2009-2010, an overall F grade in 2008-2009, and an overall C grade in 2007-2008 in the Progress Report. This represents a three year pattern of low performance for Pacific. Additionally, the New York State Department of Education identified Pacific as a PLA school in December 2010.

After a careful analysis of data and community feedback, the DOE has determined that Pacific is ill-equipped to significantly improve student outcomes within the current structure. The DOE believes that phasing out Pacific and creating higher quality educational options in its place is the best thing for future students and the broader community.

- Comments 1(f), 3, 9 and 15 suggest that Pacific is at a disadvantage because it admits all students, whereas many other schools do not, including other transfer schools. Under the DOE's accountability framework, schools are held accountable for the academic progress of their students. All transfer schools serve students who are over-age and under-credited ("OA-UC"). The Transfer School Progress Report judges schools based on how their students' performance compares to that of students in their respective peer group. A school's peer group consists of other transfer schools that serve similar populations in terms of student proficiency and demographic composition.

Taking into account the student populations that Pacific is working with, other transfer schools are achieving better outcomes than Pacific is with its students. For example, students at Pacific enroll with an average of more than 25 credits and the average age of enrollment is approximately 18. Both of these measures rank Pacific in the top 5 among the 43 transfer schools City-wide. This means that Pacific students are already closest to graduation at the time of entry. However, the outcomes of those students do not compare well to (demographically and academically similar) students at other transfer schools. Of the 180 students in Pacific's 2009-2010 6-year graduating cohort, only 17 or about 10% entered with fewer than 11 credits. The 6-year graduation rate for those students was 12%, 4th lowest among the 25 transfer schools with graduation data for those students. Furthermore, credit accumulation at a transfer school is a key step in getting back on track to graduation. Students who began at Pacific with between 11 and 22 credits earned an average of 3.53 credits per semester, 11th lowest among the 43 transfer schools City-wide. The data demonstrates that Pacific does not compare well to other transfer schools

City-wide on key measures specific to transfer schools, such as credit accumulation and 6-year graduation rates.

- In response to comments 1(f) and 9 related to the admissions policies of transfer schools: Transfer schools do not participate in the High School Admissions Process and each school determines admissions criteria individually. Transfer schools—regardless of their admissions policies—serve over-age and under-credited (“OA-UC”) students. Students designated as OA-UC are considered to be two or more years behind his or her expected age and credit accumulation at the time of entry into a transfer school. The 2009-2010 Transfer School Progress Report uses the following distinctions for OA-UC students:

Age	Credits
16	Less than 11 credits
17	Less than 22 credits
18	Less than 33 credits
19-21	Less than 44 credits

At Pacific, students enroll with an average of more than 25 credits and the average age of enrollment is approximately 18. Both of these measures rank Pacific in the top 5 among the 43 transfer schools Citywide. This means that their students are already closest to graduation when they enter.

- With regard to comment 2(a) related to the role of Community Education Councils on all proposals to close a school or make a significant change in school utilization: Community Education Councils are not involved in any final decisions to propose a school closure or make a significant change in school utilization. The DOE, however, meets with parents, teachers, School Leadership Teams, Community Education Councils, elected officials, and local community-based organizations during the engagement process to discuss what is and is not working at struggling schools, and how we can work together to better serve students. But the decision to propose a school closure or make a significant change in school utilization ultimately rests with DOE officials. The proposal to close a school is voted on by the Panel for Educational Policy.
- With regard to comments 2(e), 3 and 8 related to the DOE’s strategy of closing failing schools and replacing them with new small schools: The DOE notes that it is striving to create a system of great schools in NYC. Since 2003 the DOE has replaced 91 of the lowest-performing schools with 474 new schools. Of the 474 new schools, 365 are traditional public schools (including 25 transfer schools) and 109 are public charter schools. The DOE believes that replacing failing schools with new small schools is the most effective way to quickly turn around student achievement. The data clearly demonstrates this point. In Brooklyn, for example, the new small schools on the Bushwick Campus had a graduation rate of 71.7% in 2009-2010—nearly 50 percentage points higher than the former Bushwick High School’s graduation rate of only 22.7% in 2002.

- Comments 2(f), 3, 5, 6, 8 and 10 suggest that the DOE has not provided adequate support to Pacific and that the school should remain open and be allowed time to turn around. The DOE notes that all schools, including transfer schools, receive support and assistance from their superintendent and Children First Network team, a group of educators who work directly with schools. This team helps schools identify best practices, target strategies for specific students in need of extra help, and prioritize competing demands on resources and time. Each school community chooses the network whose support best meets its needs, and each network works to improve student achievement in all of its schools.

The EIS describing the proposal to phase out Pacific outlines a range of instructional, operational, and leadership supports offered to Pacific. In addition, a number of resources were offered to support students' socio-emotional and academic needs, particularly for struggling students. In particular, the DOE provided the following supports:

Leadership Support

- Connecting Pacific's administrators with other schools to learn effective practices that could be replicated at Pacific via monthly principals' meetings.
- Providing professional development for Pacific's principal regarding teacher observations and goal setting, supporting instructional walkthroughs to identify strengths and weaknesses throughout the school, and developing a plan for next steps.

Instructional Support

- Providing weekly professional development to teachers on a variety of topics including: differentiated instruction, curriculum mapping, data driven decision making, the implementation of the Common Core State Standards, designing and evaluating assessments, the inquiry cycle, and examining student work.
- Supporting teacher teams in analyzing student data, identifying students in need of additional support, and researching pedagogical methods to initiate instructional changes.

Operational Support

- Providing training to Pacific's principal and school staff on budgeting, human resources, recruiting and retaining talented teachers, and compliance issues.
- In the summer of 2010, the principal participated in an operations training that included the proper communication regarding purchasing, spending and available funds, the importance of school lunch applications as they yield Title 1 funds to the school, and State and Federal Ed Department websites so the school could apply for grants.

Student Support

- Supporting the design of the school’s weekly off-site internship program with its numerous existing community based organizations (“CBO”) partners including: Teen PACT, New York City Transit Authority, City Kids, Downstate Medical Center, ENACT, VESID, Vocational Training Foundation, Wildcats, Youth Build, Youth Development Center, Spark program and Planned Parenthood, Brooklyn College Talent Search, Roundabout Theatre, the Welfare Rights Initiative, and the Intergenerational Program.
- Offering advisory and college skills classes to students during the school day and after school classes in English Language Arts, Math, and Living Environment.
- Supporting the school’s attendance committee in establishing a protocol for addressing lateness, monitoring attendance daily and facilitating phone messages, individual teacher calls or home visits to students who are late or absent.

Unfortunately, despite these efforts Pacific has not turned around. Given the school’s lack of success despite supports—whether part of centralized effort to support all schools or individualized plans for Pacific—it is apparent that Pacific has not developed the proper infrastructure to meet the needs of its students and families. The school culture and conditions have not enabled increased student achievement. The DOE believes that the school does not have the capacity or infrastructure to turn around quickly to increase student performance, and that phasing out Pacific and bringing in higher quality schools will provide better options for the community and families in the future.

- With regard to comment 4, the DOE notes that the summary of the phase-out proposal, as read by Chief Academic Officer Shael Polakow-Suransky at the Joint Public Hearing, was specific to Pacific.
- In response to comments 5 and 11 related to the DOE’s efforts to support teachers at Pacific: As described earlier in this document, the DOE has offered numerous supports to Pacific staff, including, but not limited to, professional development for teachers on topics such as curriculum mapping, differentiated instruction, designing assessments, and evaluating student work.
- With regard to comments 6, 13 and 16 which relate to principal turnover: The DOE notes that Pacific has experienced a high principal turnover in recent years. While the Department works hard to train and retain principals of transfer schools, it cannot impede principals from accepting other job opportunities. It’s also important to consider that, often times, high principal turnover can be symptomatic of a school culture and that is not working and needs a fundamental change. The DOE believes that the proposed phase-out and eventual closure of Pacific will address the school’s longstanding performance struggles and allow for higher quality school options to develop.
- Comment 7 suggests that the phase-out will lead to more drop-outs. It is true that phase-out schools do typically experience some increase in the drop out rates. But, it is also true that schools that are phasing out have demonstrated an increase in performance for

remaining students in large part due to critical leadership and staff changes that may be implemented during the phase out. Pacific will continue to receive critical support from its Children First network team.

- With regard to comment 12 related to the timeline of the State’s Joint Intervention Team (“JIT”) review of Pacific and the JIT report and recommendations: Schools identified by the State as Persistently Lowest Achieving (“PLA”) or Restructuring Advanced (“RA”) are subject to a review by the JIT, comprised of a senior State Education Department (“SED”) representative and a district representative, between January and March of this year. The JIT conducted an on-site diagnostic review of Pacific during the course of several days in March 2011, which included classroom observations, interviews with school administrators, teachers and parents, and review of relevant data. The JIT report and recommendations, however, are not yet available.

Under the DOE’s accountability framework, schools are held accountable for the academic progress of their students. The DOE’s Division of Academics, Performance and Support (“DAPS”) develops and manages the evaluations that New York City uses to hold schools accountable for student achievement, and provides data, tools, and resources that educators and families use to improve schools and support student learning. The Progress Report, Quality Review, and New York State Annual School Report Card are three separate accountability systems used to evaluate schools in New York City.

- Comment 14 suggests that students who enroll with a higher number of credits are more vulnerable to dropping out than those who enroll with fewer credits: Approximately 46% of students in Pacific’s 2009-2010 graduating cohort arrived with 22 or more credits. The other half or about 53% arrived with 0-22 credits. In 2009-2010, the six-year graduation rate for students who enrolled with 22 or more credits was 64% compared to 12% and 28% for students who arrived with 0-11 credits and 12-22 credits, respectively. It follows that the 6-year graduation rate for students who arrived with 22 or more credits, those who are already closest to graduation at the time of entry, is significantly higher than the 6-year graduation rate for students who are furthest behind, those who arrived with 0-22 credits.

Changes Made to the Proposal

No changes have been made to this proposal as a result of the public comments received.