



Date: January 26, 2010

Topic: The Proposed Truncation of Middle School Grades of Frederick Douglass Academy III

Date of Panel Vote: January 26, 2010

Summary of Proposal

Beginning in 2010-2011, Frederick Douglass Academy III Secondary School (09X517, “FDA III”), an existing school serving grades 6-12, will implement a grade reconfiguration plan to change its current grade configuration to 9-12. FDA III is housed in school building X148 (hereinafter referred to as “X148”), located at 3630 Third Avenue, Bronx in Community School District 9 (“District 9”).

In the 2010-2011 school year, FDA III will gradually eliminate its middle school grades. Grade 6 will be eliminated in 2010, grade 7 will be eliminated in 2011, and grade 8 will be eliminated in 2012. District 9 will continue to have sufficient seats to serve its middle school students with the truncation of FDA III.

FDA III is currently co-located with two other schools, KAPPA (09X215, “KAPPA”) and I.S. 219 (09X219, “I.S. 219”). District 9 will continue to have sufficient seats to serve its middle school students with the truncation of FDA III. At this time, there are no plans to site another school or program in the space made available in X418 by the grade reconfiguration of FDA III. This proposal will allow resources currently allocated to FDA III’s middle grades seats to be repurposed and for middle school students to be served in existing high quality District 9 middle schools.

The Educational Impact Statement on this proposal was posted on the Department of Education’s Web site on December 3, 2009.

Prepared by

Department of Education

Summary of Comments received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building X148 on January 6, 2010. The meeting was open to the public, and all interested parties had the opportunity to comment on the proposal. Eighty-one individuals attended the hearing, 24 individuals commented on the proposal. All commenters expressed opposition to the proposal. Speakers opposed the proposal for the following reasons: (1) FDA III has a school culture that was respectful of students; (2) it is difficult to improve scores of students already performing at levels 3 and 4; (3) FDA III offered students the unique experience of transitioning from middle school to high school within one school; and (4) the school's neighborhood has many at-risk students.

Summary of Issues Raised in Written and Oral Comments and Significant Alternatives Suggested

No oral comments and one written comment regarding this proposal have been received. The comment from the Education Committee Chairperson of the Bronx Community Board #3 questioned the DOE's rationale and process for truncating FDA III, but offered no significant alternative.

In addition to the above comment, some individuals and one organization, Class Size Matters ("CSM"), submitted written comments objecting to all of the phase-outs proposed by the DOE. Although the comments did not address any one phase-out proposal in particular, but instead addressed all proposals generally, the DOE has incorporated these comments into the public comment analysis for each phase-out proposal, including FDA III.¹ In opposing the DOE's proposal to phase-out and eventually close these schools, these commenters cited the following reasons: (1) the DOE did not use a rational formula and failed to follow its own accountability standards in proposing these phase-outs; (2) the schools the DOE has proposed for phase-out have significantly high numbers of minority and high-risk students, including special education students, incoming ninth-grade students with low scores upon admission, and homeless students, who will not be accepted or accommodated at the new small schools that replace the phasing out schools; (3) the Educational Impact Statements do not address where students at the phasing out school who are behind in credits will attend in the future; (4) the Educational Impact Statements fail to analyze the impact of the phase-outs on overcrowding of other schools and use figures from the DOE's Blue Book, which does not use a formula that is aligned with state-mandated class size goals; (5) the Educational Impact Statements do not address the financial impact of the placements of teachers from the phasing-out schools into the Absent Teacher Reserve (ATR) or the expense of funding the new schools; (6) the phasing out schools are being punished for setting high academic and safety standards; (7) the phase-outs will impair recruitment of teachers into schools serving high-needs students; and (8) there is no evidence that the DOE has made an attempt to improve conditions at the schools the DOE has proposed to phase-out.

¹ Some of the general comments raise issues that are relevant only to the proposed phase-out of high schools. These comments are only addressed in the public comment analysis for each high school phase-out proposal.

Prepared by

Department of Education

Finally, CSM calls for a moratorium on school closings until the City's Independent Budget Office can prepare a report on the effects such closings. As an alternative, CSM suggests that rather than phase-out these schools, the DOE should: (1) implement smaller class sizes at the schools; (2) restore the superintendent role and cooperation between schools; (3) provide more resources and expert help for the schools; (4) develop better curricula for at-risk students; (5) provide more support to large, comprehensive high schools; (6) launch an independent investigation of test score inflation, credit recovery and cheating, and reform the accountability system so as to not encourage these practices; and (7) implement new approaches to discipline.

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

The Department of Education is proposing the truncation of FDA III because, while FDA III's high school has been successful, its middle school has failed to help students make progress. We have proposed phasing out the middle school grades to allow the principal and school staff to focus on —and build on the success of — the high school.

Despite the fact that it has a selective admissions policy, FDA III's middle school underperforms other District 9 middle schools in both ELA and math. Compared to 52.2 percent of students district-wide, 52.1 percent of FDA III middle school students are proficient in ELA; and 68.4% percent of FDA III middle school students are proficient in math, compared to 71.6 percent of students district-wide. Moreover, ELA proficiency is lower in 2009 than it was two years ago in 2007 (52.1 percent compared to 53.6 percent).

In both of the last two years, FDA III's middle school received an "F" on the progress section of its Progress Report. The school received an "A" on the student performance section of this year's Progress Report, which is not surprising given that it is a screened school, but it has consistently failed to help its middle schoolers make progress. With respect to the comments concerning the uniqueness of FDA III in that it allows middle school students to transition to high school in one school, the middle school to high school transition promised by a 6-12 school is not delivered at FDA III for half of its students. Only 50 percent of FDA III eighth grade students choose to enroll in FDA III's high school. With only half of the student population going on to FDA III for high school, the opportunity for the middle school to high school transition is not a sufficient reason to maintain the school's middle grades. The truncation of FDA III's low performing middle school grades will allow the school to focus on high school education.

Some commenters have suggested that the DOE has not used a rational formula in proposing these phase-outs and has not followed its accountability criteria in deciding which schools should be phased out. Under the DOE's accountability framework, schools that receive an overall grade of D or F on the Progress Report are subject to school improvement measures. If no significant progress is made over time, a leadership change (subject to contractual obligations), restructuring, or closure is possible. The same is true for schools receiving a C for three years in a row and any school that the Chancellor has determined lacks the necessary

Prepared by

Department of Education

capacity to improve student performance, regardless of the school’s Progress Report grades and Quality Review scores.

It is important to understand that the DOE weighs numerous factors when evaluating schools as candidates for closure. Although Progress Report grades and Quality Review scores contribute significantly to the decision-making process, they are not the only considerations. The DOE takes into account many other sources of information as well, including school performance trends, enrollment data, demand data, and evaluations by superintendents and school support staff who work closely with the school and can evaluate its capacity to make significant improvements within a short time span.

The Quality Review evaluates how well schools are organized to improve student learning. It measures educator and administrator actions, which are “inputs.” It does not measure results, or “outputs,” and though it reflects some factors in school success, those are but one set of factors. If administrator actions improve while student progress does not, we still must try to change the outcome. Schools are rated on a four-point scale, with “Well Developed” representing the top category of performance. But school turnaround is difficult, takes time, and does not always succeed. A score of “Well Developed” might give us confidence that the school has the capacity to rapidly make significant improvements, while a “Proficient” school may only be capable of making incremental gains insufficient to quickly reverse a longstanding history of failure.

Proficient schools possess strengths and weaknesses. In evaluating the Quality Review reports from schools considered for closure, we looked closely at the reviewer’s assessment of those strengths and weaknesses to see how they might impact the school’s capacity to achieve a dramatic turnaround. For example, at many of the schools proposed for closure, evaluators found that instruction lacked rigor or was not sufficiently differentiated to meet individual student needs—both very serious concerns.

Many of the schools we proposed for closure received “Proficient” ratings on their Quality Reviews, including FDA III, and that is good news for current students who will remain enrolled in the school as it phases out. We expect phase-out schools to continue supporting their students and, in fact, outcomes at phase-out schools have historically improved with each successive year. That said, the Department’s comprehensive review of the 19 schools proposed for closure found that none of those schools was equipped to make the dramatic progress needed to quickly transform into truly successful schools where all students can thrive.

Comments further suggest that the DOE has targeted schools with high numbers of minority students and at-risk students, including special education students, incoming ninth graders with low test scores, and homeless students. In support of this claim, the commenters allege that the schools subject to phase-out serve a significantly higher number of at-risk students than schools with similarly low grades that are not slated for closure. The comments also claim that these students will be displaced as a result of the school phase-outs because the new small replacement schools will not accept or accommodate such students. New schools opened by the DOE serve all students.

Prepared by

Department of Education

Only 9.8 percent of FDA III Middle School students are English language learners and 7.3 percent are special education students, compared with District 9, in which 26.9 percent of students are English language learners and 9.1 percent of students receive special education services. In a district where middle schools have an average special education population of 12 percent, FDA III serves only 7.3% special education students. The new small schools that have been created over the last six years do, in fact, accept English language learners and special education students and are serving them at a higher rate than schools citywide, with better outcomes. With respect to homeless students in particular, one commenter asserted that closing schools would take away homeless students' only stable environment. The phase-out process, however, is a gradual one and will not displace these students. Further, student outcomes at phase-out schools tend to improve with each successive year as they become smaller and are better able to provide personalized attention to their students.

Current students at the schools proposed for phase-out, including current FDA III students, will not be displaced as a result of the phase-out proposals. The DOE is committed to supporting schools as they phase-out. The DOE will assist phase-out schools in developing individual plans for each student to ensure that they continue to make progress and will be able to earn a diploma or transition to high school at the point the school is slated for complete phase-out. If a middle school student does not meet the promotion criteria for ninth grade entry by the time the current school completely closes, then the student will be enrolled in a different middle school – either the zoned school, replacement school, or a district choice option depending on available seats and district enrollment policy.

The DOE does not anticipate that the phase-out of schools will result in overcrowding at other schools throughout the city. With the phase-out and eventual closure of these schools, including FDA III, the DOE has also proposed the phase-in of several new small schools. The building in which FDA III is housed will not be closed and we will be replacing each seat that is lost. For next year there will be sufficient seats. To the extent one commenter asserts that the DOE has not adhered to state-mandated class size goals in planning school phase-out and new replacement schools, the DOE disagrees. Through a combination of new facilities, the adjustment of enrollment projections and the opening of new schools, we will serve all students who otherwise would have attended a school proposed for closure.

Some comments further state that schools are being punished for setting high academic and safety standards. The DOE is not using phase-out proposals to punish schools. The schools proposed for phase-out have not exhibited evidence of helping students to achieve high standards. In fact, the schools proposed for phase-out have a long history of underperformance.

In opposing all of the DOE's phase-out proposals, one commenter argues that no school should be phased out and closed due to the potentially impaired recruitment of teachers into schools serving high needs students, the costs associated with starting new replacement schools, and the expense of placing teachers in the absent teacher reserve pool. First, there is no evidence that school closures cause teachers to avoid working at schools that serve high needs students. In fact, over the last seven years, the Department has raised teacher preparation to a point where 100 percent of teachers are certified, as compared to a low of 83 percent before, with the gap existing in high-poverty schools. Second, while there are costs associated with the opening of

Prepared by

Department of Education

new schools and with teachers put into excess, the greater cost is that of the thousands of students who have passed through the schools proposed for closure without graduating or developing proficiency. Cost can only be considered in the context of what is earned in return. In these cases, too few students have earned the education we owe them, and the costs are borne by not just the DOE, but those children, their families, and society at-large.

Finally, some commenters have asserted that there is no evidence that the DOE attempted to improve the conditions at any of the schools it has proposed to close and suggests steps the DOE should take to improve these schools. FDA III has worked closely with a Partnership Support Organization (PSO) and network team selected by the principal and School Leadership Team. The PSO works with the principal and other school staff members to provide support on a broad set of issues, including curriculum and instruction, human resources, professional development, budgets, and legal issues, among others. These PSOs work closely with the schools to ensure that inquiry teams are working at each school and using data to drive instruction. Network Leaders and Achievement Coaches spend time on a weekly basis in the schools. In addition the Superintendents and School Achievement Facilitators also provide support to schools and Principals. All City schools benefit from these supports and most City schools have made steady progress under this Administration. FDA III's PSO funded school staff to participate in the Lorrain Monroe Institute where teachers receive professional development related to instruction, youth development, and early college preparatory programs specific to middle school students; conducted mock Quality Reviews and provided additional professional development sessions; and provided support in strengthening the social studies curriculum.

Because there is little evidence to suggest that continued school improvement measures will result in improved outcomes for students, the DOE has chosen not to accept the alternatives proposed by certain commenters for additional steps to take to improve the school. The proposal will be presented to the Panel for Educational Policy as it is currently posted.

A copy of the educational impact statement for this proposal can be obtained at http://schools.nyc.gov/NR/rdonlyres/F0043783-8608-433C-855E-99228622A268/73246/09X517_EIS_12030992.pdf.

Prepared by

Department of Education