



Date: January 25, 2010

Topic: Proposed Phase-out and Closure of P.S. 332 Charles H. Houston

Date of Panel Vote: January 26, 2010

Summary of Proposal

The DOE proposes to phase-out and eventually close P.S. 332 Charles H. Houston (23K332, “P.S. 332”), an existing school serving students in pre-Kindergarten and grades K-8 in Community School District 23. P.S. 332 currently is located at 51 Christopher Avenue in Brooklyn. Beginning in 2010-2011, P.S. 332 will begin phasing out multiple grades per year until the school closes in June 2012. Pre-Kindergarten, Kindergarten, and grades 2, 3, and 6 will be eliminated in 2010-2011, and grades 4 and 7 will be eliminated in 2011-2012. The school will close in June 2012.

The phase-out and eventual closure of P.S. 332 will create available space in K332 to house two new schools, 23K747 and Collegiate Charter School. 23K747 will open in K332 in 2010-2011 and will serve grades K-3 with an enrollment of approximately 180 students. Collegiate Charter School, a new public school that received final approval for its charter application, will open in K332 in 2010-2011 serving grade 5 and will eventually serve grades 5-8.

An Educational Impact Statement regarding this proposal was posted on the Department of Education’s (DOE) website on December 10, 2009.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building K332 on January 13, 2010. The hearing was open to the public and gave all interested parties the opportunity to comment on the proposal. Two hundred and seven individuals attended the hearing and 38 spoke, all opposed to the proposal. Speakers opposed the proposal stating that: (1) the school’s large high needs population should have been taken into account; (2) they do not want the school to close; and (3) the school’s poor performance is the DOE’s fault.

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

One written comment regarding this proposal has been received. The commenter is a teacher at the school and mentioned recent improvements in P.S./I.S. 332's curriculum, including the undertaking of a new literacy program entitled "Treasures" and the Core Knowledge Program. The commenter notes that the positive improvements these programs are making will not be seen if the school closes. The commenter also notes that she was informed that if a charter was brought in to replace P.S./I.S. 332, that there would be two teachers per classroom. She wondered whether P.S./I.S. 332 could receive funding to have two teachers per classroom instead of starting a new school. Finally, the commenter noted that the claim that students do not want to attend P.S./I.S. 332 is not true. Indeed, many parents of special education students choose to send their children to P.S./I.S. 332.

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 P.S./I.S. 332.¹ 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.

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

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.

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 DOE has proposed to phase out and eventually close P.S. 332 based on the school's consistently poor performance over the last three years and because it lacks the capacity to turn around and better serve its students. In a year where only 17 district elementary and middle schools citywide received a C grade, P.S. 332 earned its third consecutive C grade on its 2008-2009 Progress Report. In fact, P.S. 332 was the only elementary school in District 23 that did not receive an A or B grade on its 2008-09 Progress Report. ELA and math scores lag significantly behind other schools in the district as well as behind citywide averages. In 2008-09, 52 percent of P.S. 332 students were proficient in ELA, and 61 percent were proficient in math, compared with 59 percent and 86 percent in the District, respectively. Furthermore, contrary to one commenter's claim that many students do, in fact, choose to attend P.S. 332, demand for the school is low. Just more than half of eligible district students enroll at PS 332, and only 37 percent of PS 332 students live in the zone. While there may have been some recent improvements to curriculum at the school as one commenter pointed out, the school has not demonstrated that it is able to successfully serve its students.

With regard to the question submitted in written comment regarding funding for two teachers per classroom rather than the creation of a new school, it is important to note that the DOE does not make school-level staffing decisions. Schools receive Fair Student Funding (FSF) foundation funding and per capita allocations based on grade level, student achievement and need-based weights. These funds may, at the school's discretion, be used for teaching positions, curriculum materials, general instructional supplies, administration, or other support services. FSF covers basic instructional needs and is allocated to each school based on the number and need-level of students at the school. All money allocated through FSF can be used at the principal's discretion.

Some commenters have suggested that the DOE has not used a rational formula in proposing school 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 for schools that the Chancellor has determined lack the necessary 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. The Quality Review 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 P.S. 332, 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 assert 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. They 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.

The proportion of high-need students enrolled in P.S. 332 is fairly similar to district-wide averages, and other schools serving similar students are getting far better results. In District 23, 4.1 percent of students are English language learners and 10.2 percent receive special education services, compared to 6.7 percent and 12.8 percent of students at P.S. 332, respectively. 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. The new elementary and middle school proposed to replace P.S. 332 will be prepared to serve higher than average percentages of special education students and English language learners. With respect to homeless students in particular, one

commenter suggests 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 P.S. 332 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 P.S. 332, the DOE has also proposed the phase-in of several new small schools. The building in which P.S. 332 is housed will not be closed and we will be replacing each seat that is lost in the district. The K332 building is currently at 60% utilization in 2008-2009 blue book and an average class size below 20 students in many classes. All zoned students will continue to be served in the new DOE elementary school proposed to open in K332. 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-outs 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 commenters have stated 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. There is, however, 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 DOE 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 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 born 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. P.S. 332 has worked closely with a School Support Organization and network team selected by the principal and School Leadership Team. The SSO 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 SSOs 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. The SSO provided P.S. 332 professional development opportunities in all content areas. Specifically, the professional development program was designed to help teachers deliver more rigorous, standards-based instruction that was appropriately tailored to individual student needs.

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. 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/ronlyres/F0043783-8608-433C-855E-99228622A268/73697/23K332PS332EIS3.pdf>.