



class size matters

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**Comments on proposed changes in school utilization, including closures, co-locations, and expansions to be voted at the Panel for Educational Policy Meeting
February 9, 2012**

February 8, 2012

The following comments are in three parts: a discussion of the effect of these proposals on the availability of CTE/vocational seats and programs, the likely impact on overcrowding and class size, and other options which should have been considered before closing these schools, especially class size reduction.

Loss of seats and programs in phase-out CTE/Vocational Schools

In the Educational Impact Statements, there is little or no discussion of what the likely impact will be of subtracting 2531 CTE seats in the three large HS in the Bronx proposed to be phased out.

Samuel Gompers has 630 seats, Jane Addams has 706 seats, and Grace Dodge has 1195 seats, for a total of 2531 seats. Though new charter schools and one new district school may replace some of these seats, there is no mention that hundreds of CTE seats may be lost, and no analysis of the impact of the loss of hundreds of seats in specific CTE vocational programs, some of them in highly valued careers.

The DOE claims that one of the new schools, Crotona International, that has already opened, will eventually offer unspecified vocational programs, though this is not mentioned in its description in the current DOE High School directory. If it does not, there will be a loss of up to 500 vocational seats in the Bronx alone from the closure of these three schools.¹

SAMUEL GOMPERS HS

The EIS claims that the phase-out and co-location of New Visions Advanced Math & Science II in building X655 is not expected to affect the CTE programming in Samuel Gompers, but this is difficult to believe as schools cannot afford to keep programs going as their enrollment and staff

¹ NYC DOE High School Directory, 2011-2012; Bronx section posted at <http://schools.nyc.gov/NR/rdonlyres/24765259-76C7-481C-AF17-525F4ED51B4D/0/BronxMerged107v1105182011.pdf>

diminishes.² See what happened at Jamaica HS for example, despite the promises of the DOE, as this school phases out.

Each of EIS of the three vocational schools to be phased-out offers the same boilerplate language, none of which is convincing:

“As the school’s enrollment continues to decrease, it is possible that the availability of certain programs and course offerings will change because they depend on student interest, demand, and available resources.” The DOE then adds: “*However, it is anticipated that the school will still have the appropriate staff and facilities throughout [school name’s] phase-out to offer coursework necessary to the CTE course progression for all students, whether in approved programs or programs in development.*”³ This is unlikely to occur, for the reasons stated above.

Moreover, the new charter school to co-locate in the Samuel Gompers building, New Visions Advanced Math & Science II, will offer CTE programming in only the two following career clusters: Health Sciences; and Science, Research, and Engineering. As a result, it will replace only ONE of the CTE programs currently offered by Gompers – the Science, Research, and Engineering cluster.

Furthermore, this charter school would not replace either of Gompers’ two State-approved programs – the Information Technology career cluster or the Arts, AV Tech and Communication career cluster – nor would it replace the Manufacturing Production program. There is also no information in the EIS about how many students are currently served by Gompers in each of these programs, and how many seats in each program will be lost.

Moreover, *none* of the programs in the charter school will have state approval/licensing for many years, as this takes time. New Visions also lacks any track record of running successful vocational/CTE programs.

JANE ADDAMS HS

According to the EIS, Jane Addams is a CTE school which offers programs in the following career clusters: Business Management and Administration, Health Science, Human Services, and Law and Public Safety. If this proposal is approved, beginning in September 2012, Jane Addams will no longer be an option for new students interested in CTE programming.⁴

New Visions Humanities II would offer CTE programming in the two following career clusters: Business Management and Administration; Hospitality and Tourism. The unnamed district school, 08X559, will offer CTE programming in either the Science, Research, and Engineering career cluster or the Hospitality and Tourism career cluster.

² From P.7 EIS for New Visions AMS II HS: http://schools.nyc.gov/NR/rdonlyres/442F7C27-FD97-4B1A-91EA-28D53BC9B394/116626/84XTBDGompersCharterCoLocationEIS_vfinal.pdf

³ From p. 15-16 EIS for Grace Dodge Phase-out (replicated in other EISs): http://schools.nyc.gov/NR/rdonlyres/442F7C27-FD97-4B1A-91EA-28D53BC9B394/116637/10X660DodgePOEIS_vFINAL.pdf

⁴ Information about Jane Addams Phase-out from p. 13-14 Amended EIS (Amended Feb 3 2012): http://schools.nyc.gov/NR/rdonlyres/442F7C27-FD97-4B1A-91EA-28D53BC9B394/118967/AMENDEDAddamsPOEIS_vFINAL.pdf

Thus, New Visions Humanities II charter school and the proposed New District HS, so far unnamed, are proposed to replace *only ONE* of Jane Addams' FOUR CTE programs – the Business Management and Tourism program. Furthermore, the EIS states the possibility that both of these new schools could offer the same CTE career cluster – Hospitality and Tourism.⁵

This would mean that the three other CTE programs currently offered at Jane Addams (Health Sciences, Law and Public Safety, and Human Services), which includes one State approved program (Human Services) would not be replaced by the new schools.

In a recent study by the Public Advocate's office, the vocational careers that are reported to have the greatest demand in NYC are Human Services and Health Sciences. Neither of these careers, now offered by Jane Addams, will be replaced by the new schools in the building. The new charter school is expected to offer Business Management and Administration – the career area with *the least expected growth*, according to this report.⁶

GRACE DODGE HS

According to the EIS, Grace Dodge is a CTE school which offers programs in the following career clusters: Business Management and Administration; Arts, A/V Technology, and Communication; Business Management and Administration; Health Science; Information Technology; Law and Public Safety; and Marketing Sales and Services. According to the DOE, if this proposal is approved, Grace Dodge will no longer be an option for new students interested in CTE programming.⁷

DOE claims that Crotona International (another district HS previously co-located in the building) offers one vocational/CTE program, though the EIS says that program is still “to be determined, which means the school is still working out details for its proposed CTE program. This program is in the career cluster Information Technology.”⁸ The current DOE High School Handbook has *no mention of any vocational programs* being offered at this school, currently or in the future, and it is unclear how a school that already exists should not have already determined which CTE program it will offer its students.⁹

⁵ From EIS – New Visions Charter School for the Humanities II: http://schools.nyc.gov/NR/rdonlyres/442F7C27-FD97-4B1A-91EA-28D53BC9B394/116634/84XTBDAddamsCharterCoLocationEIS_vfinal.pdf and EIS for New District HS: http://schools.nyc.gov/NR/rdonlyres/442F7C27-FD97-4B1A-91EA-28D53BC9B394/116644/08X559AddamsDistrictCoLocationEIS_vFinal.pdf

⁶ Office of the Public Advocate, “Path to the Future: Strengthening Career and Vocational Education” January 2011 at: <http://advocate.nyc.gov/files/deBlasio-CTE-Report.pdf>

⁷ See p. 15-16 of EIS from Feb 9, 2012 PEP Agenda: http://schools.nyc.gov/NR/rdonlyres/442F7C27-FD97-4B1A-91EA-28D53BC9B394/116637/10X660DodgePOEIS_vFINAL.pdf

⁸ Ibid.

⁹ NYC DOE High School Directory, 2011-2012; Bronx section posted at <http://schools.nyc.gov/NR/rdonlyres/24765259-76C7-481C-AF17-525F4ED51B4D/0/BronxMerged107v1105182011.pdf>

The EIS also says that another unnamed school (10X565) will be created in the building that will offer CTE programming in the Architecture and Construction career cluster.¹⁰

In any case Grace Dodge's substantial CTE offerings and 1195 seats will not be adequately replaced, with either new school. Grace Dodge currently offers six CTE programs – one approved by the State – none of which would be replicated by the new district HS's single CTE career cluster offering. In particular, Grace Dodge offers a CTE program in Health Sciences – *which is one of the two careers with the largest demand*, according to the Public Advocate report. This program will not be replaced.

Moreover, the number of seats in the two new vocational schools will total only 720-800 as of 2015-2016, when Grace Dodge will have disappeared, which indicates a loss of over 300 CTE seats – unmentioned in the EIS.

The likely effect of these proposals on overcrowding and class size

Several of the proposals would lead to extreme overcrowding and very high class sizes, again violating the city's mandate to reduce class size and the court's decision in the CFE case. In fact, in none of the EIS's is there any discussion of how these closures or co-locations would likely affect class size, a key component of a quality education, according to the views of the NY State Supreme Court, as well as most NYC parents and principals, as well as the findings of rigorous research.

This problem is exacerbated by the fact that there are no longer ANY class size standards in the city's instructional footprint, by which the DOE determines if there is space for co-locations and new schools. Moreover, the DOE's utilization figures, as cited in the EIS's, is determined by a formula in their annual Enrollment, Capacity & Utilization Report, also known as the "Blue book".¹¹ This formula has never taken into the need to reduce class size into account. See below chart:

grade level	target class sizes in "blue book"	C4E Class Size goals by 2012
K-3	20	19.9
grades 4-5	28	22.9
grades 6-8	28	22.9
HS (core classes)	30	24.5

¹⁰ From NYC DOE, EIS for Colocation and Opening of "New HS" in Grace Dodge Building, p.8-9: http://schools.nyc.gov/NR/rdonlyres/442F7C27-FD97-4B1A-91EA-28D53BC9B394/116639/10X660DodgeCoLocationEIS_FINAL.pdf

¹¹ NYC DOE, Enrollment, Capacity and Utilization Report 2010 –2011; posted at <http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Enrollment/2010-2011-Bluebook.pdf>

Given the class size goals listed above, high schools should be capped at 81%, middle schools at 82% and elementary schools at 91%.

Here are some examples of proposals that, if enacted, would make it nearly impossible for schools in the following buildings to be able reduce class size to appropriate levels:

School Building X450: with ten high schools in the building as Gateway phases out, and nine eventually, leading to an estimated utilization figure of 82-91%.

School building 08X850 (Jane Addams building); HS phase-out and co-locations; projected to be at 89-97% by 2017-1018.

School building X135: Expansion and co-locations of new middle schools: 85-93% by 2014-2015.

School building K580: Expansion and Co-locations of elementary and HS's: 90-97% by 2012-2015.

School building 17K022: Phase-out, grade truncations and expansions: 104-112% by 2017-2018.

School building 19K171: IS Abraham Lincoln (19K171) grade truncations, school phase outs and a new middle school co-location; leading to 81-93% utilization.

School building M882: Legacy HS phase out, with new school co-located; leading to 88-97% utilization by 2015-2016.

School building M415: Wadleigh Secondary School (03M415): grade truncation, along with expansion of Harlem Success Academy I (84M351): leading to projected utilization of 94-105% in 2015-2016.

School building Q215: PS 215 Lucretia Mott phase out, with new school co-location: leading to 113%-124% utilization in 2015-2016.

School building 31R014: PS14 Cornelius Vanderbilt phase out with new school co-location 31R078: leading to 94-103% utilization by 2015-2016.

School building 19K007: grade expansion of PS Abraham Lincoln, leading to 124-131% utilization by 2021-2013.

This last proposal is especially damaging and will likely mean larger class sizes and the school's loss of two pre-K classes – though the EIS mentions neither possibility.

Alternatives to phasing out schools: Reduce class size

Parents, teachers, students and community members have all strongly opposed the closures of the schools under consideration, and have urged the DOE to help these schools improve rather than phase them out.

A quick look at the data reveals that many of the struggling schools DOE is planning to close have very high class sizes; far above the state average and the targets in the city's mandated Contract for Excellence/ class size reduction plan.

According to the city's C4E plan, average high school core class sizes were supposed to be reduced to 24.8 during the last school year (2010-2011) and to 24.5 this school year (2011-2012.)¹² Yet the data shows that at least four of these high schools, class sizes were far larger than this, and much larger than average class sizes in schools outside NYC.

All of the schools shown below also have very high concentrations of at-risk students, including English language learners, students with disabilities and those living below the poverty line, the very populations that benefit most from class size reduction.¹³ These schools should not be phased out without first giving their students a real chance to succeed, and provided with their right to a sound basic education, which in the judgment of NY State's highest court, requires smaller classes.¹⁴

Data Sources: All individual HS class size data from DOE class size reports 2010-2011.¹⁵ Class size averages NYC & NYS less NYC from NYSED data, 2010-2011.¹⁶

¹² Class Size Matters, "Contracts for Excellence: New York City's failures and violations of law as regards class size," November 15, 2011; at <http://www.classsizematters.org/wp-content/uploads/2011/11/C4E-for-citywide-final.ppt>

¹³ For example, see Spyros Konstantopoulos and Vicki Chun, "What Are the Long-Term Effects of Small Classes on the Achievement Gap? Evidence from the Lasting Benefits Study," American Journal of Education 116, November 2009; Peter Blatchford et.al. "Do low attaining and younger students benefit most from small classes? Results from a systematic observation study of class size effects on pupil classroom engagement and teacher pupil interaction," paper delivered to the American Educational Research Association Annual Meeting 2008; Thomas Dee and Martin West, "The Non-Cognitive Returns to Class Size," Educational Evaluation and Policy Analysis, March 2011, vol. 33 no. 1 23-46; Alan B. Krueger, Economic Considerations and Class Size, The Economic Journal, 113 , February 2003; Jeremy D. Finn et.al., "Small Classes in the Early Grades, Academic Achievement, and Graduating From High School," Journal of Educational Psychology, 2005; Alan B. Krueger and Diane M. Whitmore, "Would Smaller Classes Help Close the Black-White Achievement Gap?" from :Bridging the Achievement Gap, Brookings Institution Press 2002.

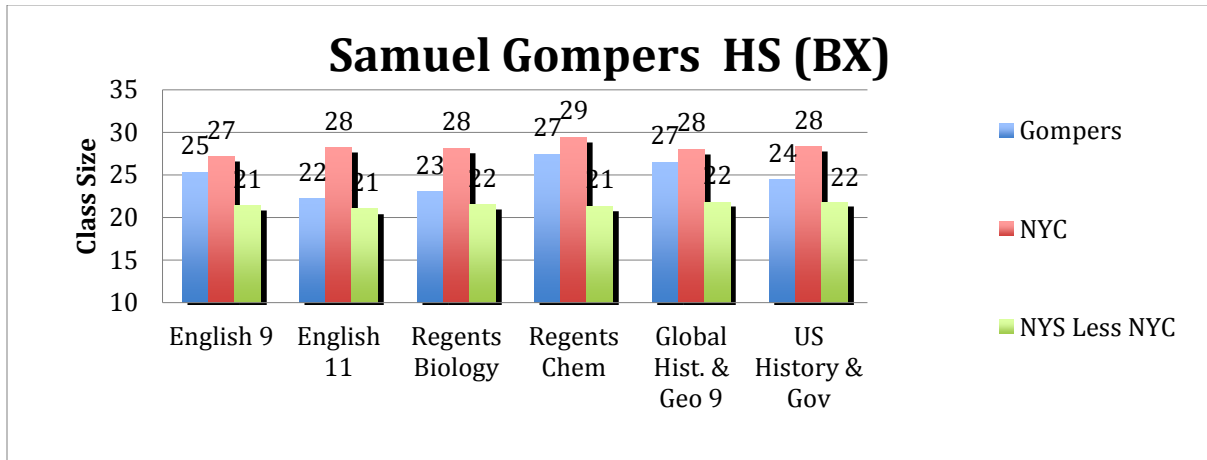
¹⁴ Campaign for Fiscal Equity, Inc., et al. v. State of New York, et al., 100 N.Y.2d 893, 911-12 (2003)

¹⁵ NYC DOE 2010-11 Preliminary Class Size Report (updated on 11/15/10); <http://schools.nyc.gov/AboutUs/data/classsize/classsize111510.htm>

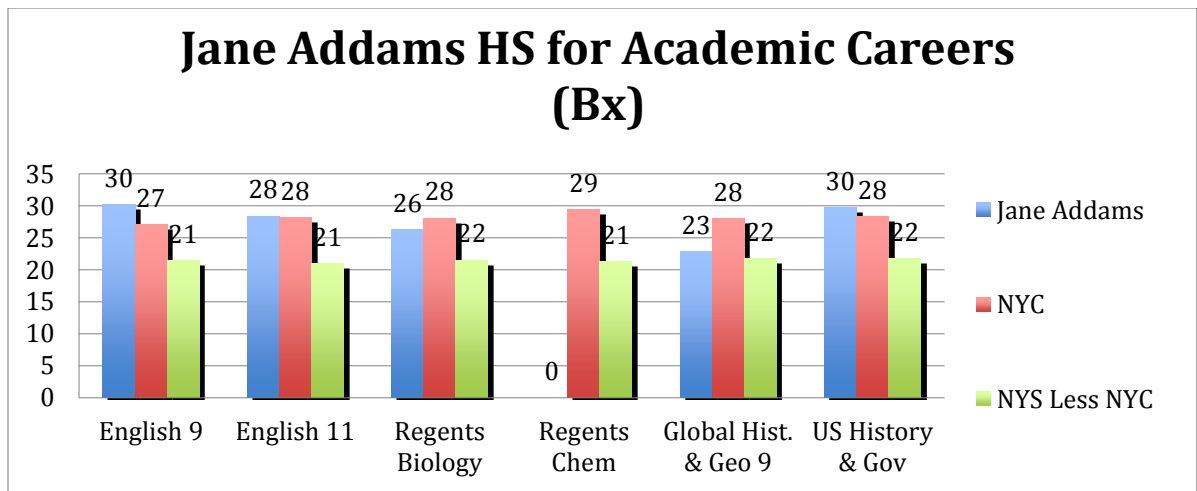
¹⁶ New York State Education Department IRTS, Average Class Size for Selected Assignment Codes 2010-2011; <http://www.p12.nysed.gov/irs/pmf/2010-11/2011-Avg-Class-Size.pdf>

High Schools

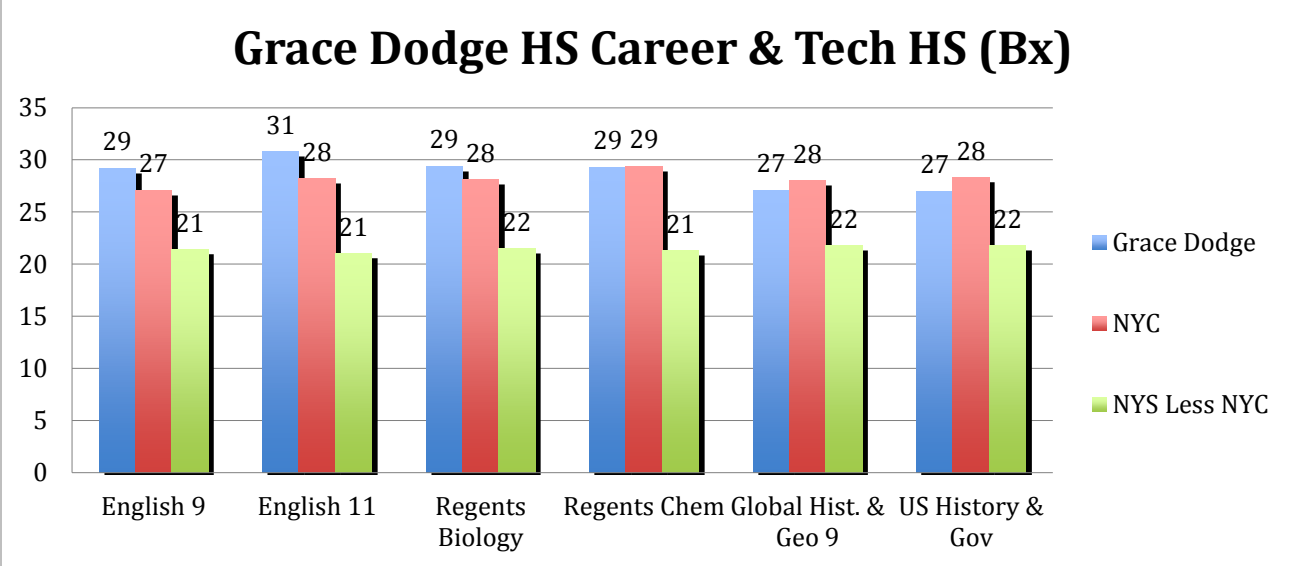
Samuel Gompers Career and Technical Education HS in the Bronx (07X655) Phase-out.



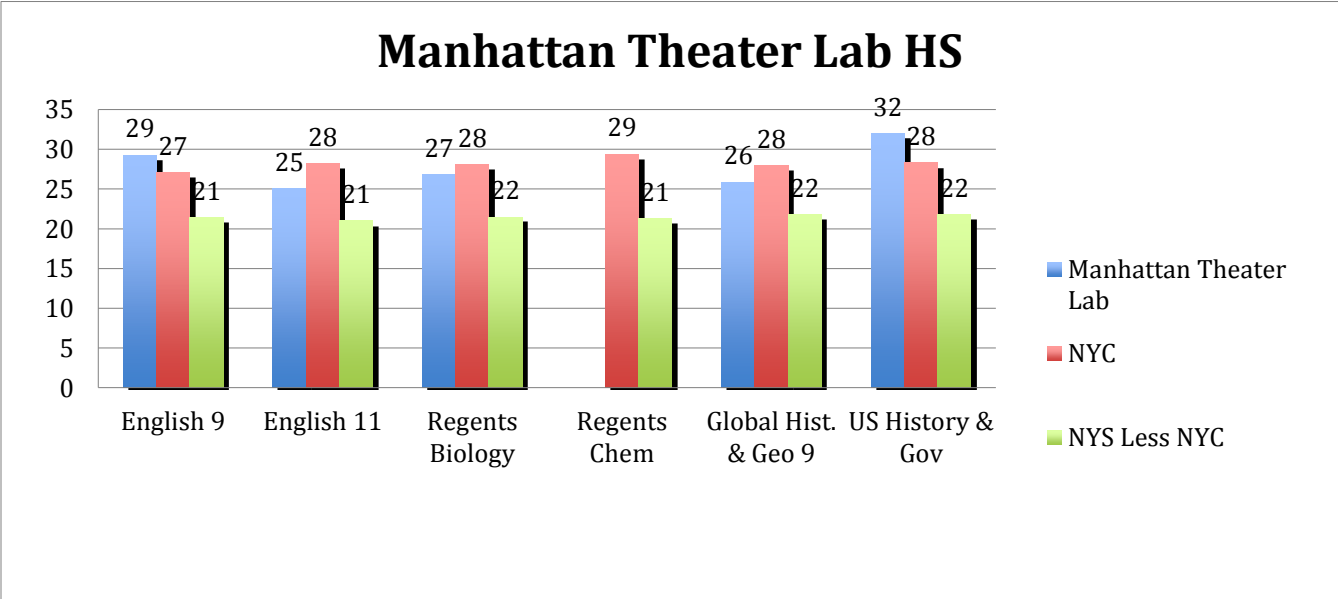
Jane Addams High School for Academic Careers (08X650) Phase-out



Grace Dodge Career and Technical Education High School (10X660), Phase-out



Manhattan Theatre Lab High School (03M283) Phase-out

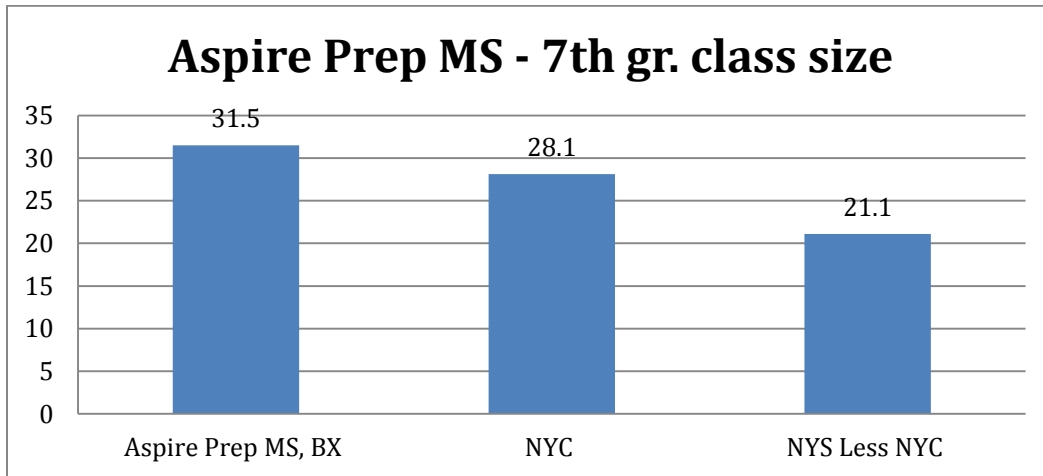


Middle Schools

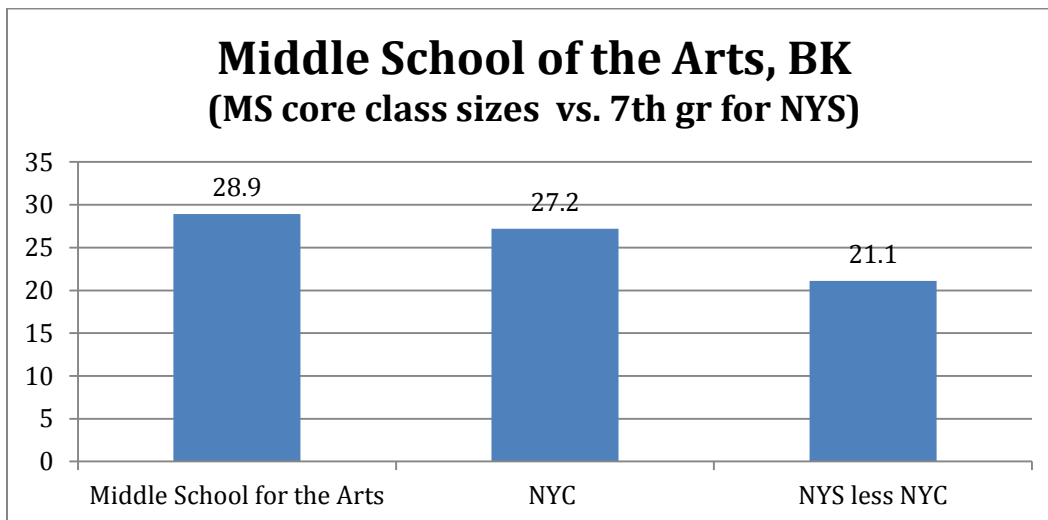
For several phase-out middle schools, class size averages are above citywide averages, and far above state averages. See the charts below, showing class sizes at two middle schools in particular: Aspire Prep MS in the Bronx and MS for the Arts in Brooklyn.

C4E class size goals: Goals in city's mandated class size reduction plan for grades 4-8 were 23.3 student per class on average for last year (2010-2011) and 22.9 for this school year (2011-2012).

Aspire Preparatory Middle School (11X322), Phase-out



Middle School for the Arts (17K587) Phase-out



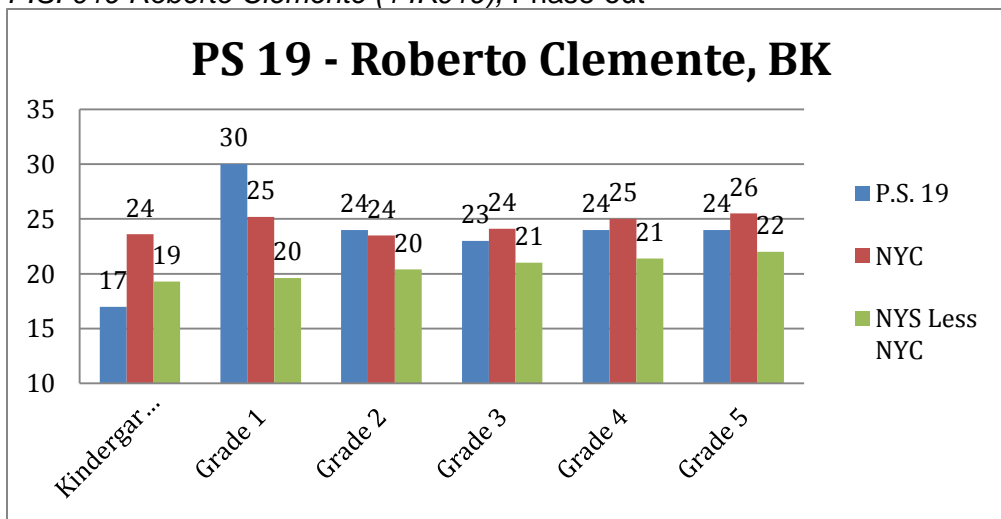
Elementary schools

Similarly, at many elementary schools class sizes now being proposed to phase out, class sizes were exceedingly large last year and this year – compared to citywide and state averages.

C4E class size goals: The goal in the city's mandated class size reduction plan was 20.1 students per class in grades K-3 for last year (2010-2011) and 19.9 for this year (2011-2012). In grades 4-5, they were: 23.3 student per class on average for last year (2010-2011) and 22.9 for this school year (2011-2012).

Two egregious examples of elementary schools with excessive class sizes, especially given their high-needs student population, are PS 19 Roberto Clemente Elementary School in Brooklyn; and P.S. 215 Lucretia Mott in Queens.

P.S. 019 Roberto Clemente (14K019), Phase-out



P.S. 215 Lucretia Mott (27Q215) Phase-out

