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November 9, 2017

Carmen Fariña Chancellor, Department of Education Tweed Courthouse 52 Chambers Street New York, New York 10007

Re: Request that NYC Move to Borough-level DLTs for High Schools

Dear Chancellor Fariña,

Since the spring of 2015, high school Presidents' Council presidents and CPAC have expressed our concern over the current high school structure and its impact on discussions and resolutions of high school issues. There is currently no forum for high school superintendents, the CSA, the UFT, and high school Presidents' Council presidents to come together to discuss high school issues. With rare exception, high school superintendents do not attend DLTs, even though this is required under CR A-655. Most superintendents do not even send representatives, most representatives are principals who attend anyway and should be representing the CSA, and representatives cannot take meaningful action on behalf of the superintendent. That said, it is difficult to envision what fully functioning DLTs would look like under the current high school structure given the number of superintendents now serving in each community district: should we have one community superintendent and 4-8 (or so) high school superintendents at the DLT? And how can high school superintendents possibly attend every DLT in districts in which they have a school? And follow all the various goals and action plans developed in each district? The current community district DLT structure is not aligned with the high school superintendency structure, resulting in the absence of discussion of high school issues by all the key stakeholders at DLTs or any other forum.

CPAC and the high school Presidents' Council presidents have long argued that, given the current high school superintendents' structure, the DOE should create Borough-level DLTs for high schools, removing them from community district DLTs (which currently focus almost exclusively on Pre-K to 8th grade issues). All high school superintendents with high schools in the borough would be required to attend, along with representatives from the UFT, CSA, DC-37, the Presidents' Council

president, and the Citywide Council on High Schools. The borough high school DLT would meet monthly and develop the DCEP for high schools in the borough and discuss high school concerns. In addition, the borough high school DLT would be responsible for assisting with annual training and support for high school SLTs. We are once again urging you to create borough-level high school DLTs.

To underscore the kinds of issues that have been brought up but have been left unresolved, the CPAC High School Committee (which includes all the high school Presidents' Council presidents and other high school parent leaders) have compiled a list of high school issues that have been brought up at DLTs but have largely been left unresolved. These are important items that need a forum to be addressed – and we believe this forum is a borough-level high school DLT.

The high school Presidents' Council presidents and members of CPAC's High School Committee would welcome the opportunity to discuss this with you further.

With much appreciation,

The Chancellor's Parent Advisory Council

Approved by the membership at the November 9, 2017 CPAC meeting

cc: Senior Supervising Superintendent Laura Feijoo, High School Subcommittee Chair Michael Alcoff

Please find below issues that have arisen at DLT meetings that could not be addressed because high school superintendents were not at the meeting. This is an exhaustive list but not a complete list of issues that have come up at DLTs since the introduction of the new high school superintendency structure.

District Issues

- DLT Process and DCEPs/High School SLT support
 - DCEPs are K-12 documents, but high school stakeholders are left out of the process
 - Almost no high school superintendents attend DLT meetings. DCEP goals and action plans are created without discussion among high school superintendents, principals, teachers, and parents.
 - Even if high school superintendents wished to participate in the DLTs in which they have schools, this would not be feasible because DLT dates overlap.
 - High school data are almost never presented, with little to no discussion of what little is presented and how to work with schools to improve outcomes.
 - High school superintendents are not involved in drafting the DCEP; there is no discussion of high school needs, goals, or action plans among stakeholders.
 - High school superintendents are allowed to make changes to the DCEP through iplan without any discussion at the DLT and without even informing DLT members of the changes, antithetical to the foundation of DLTs.
 - Neither high schools in a district nor their superintendents are expected to know the goals and action plans created for them at the DLT, let alone implement them.
 - DLTs are trying to complete progress monitoring of DCEPs but there is no mechanism to verify progress of high schools – or even whether they are working toward district goals.
 - There is no midterm or final review of progress on high school actions plans or goals.
 - Community superintendents and members of DLTs have expressed concerns that the district will be held accountable for high school progress in DCEP (goals, actions)
 - How can high school superintendents develop, implement, and monitor 6 different goals and actions plans across all their districts? Current high school superintendents have schools in multiple districts (say, 10 for easy math) and each district DCEP now has 6 goals and action plans that include high schools meaning 60 separate goals and action plans (some superintendents have more, some less). Impractical.
 - Confusion over which DCEP goals/action plans high schools are supposed to follow. Do they follow the DCEP of their district or the DCEP of the district in which their Superintendent (or Superintendent's rep) participates?
 - DOE plans to include a high school graduation goal in the DCEP. Each superintendent completes a form for all his/her schools across districts and boroughs, then DOE central will pull together the goals and action plan items from all the superintendents in each district – without knowing the schools within the district and without any input from principals, teachers, and parents. The graduation goal and action plan may have absolutely nothing to do with the high schools in the district.
 - This new process codifies that no discussion is expected among high schools stakeholders on high schools issues at the DLT.

- Are high schools in the district supposed to follow the graduation goal/action plan fabricated by central for the district or the goal/action plan created by their superintendent for all his/her schools that went into the fabricated district goal?
- Members of DLTs expressed discomfort signing a document with a goal and action plan they had no voice in creating.
- Occasionally, a superintendent will send a "rep" to the DLT meeting
 - Traditionally the rep gives a 2 minute report, usually covering their superintendent's principals conference, which has limited value from the perspective of the work the DLT does.
 - The rep normally knows little about the high schools in the district and has no decision-making ability. It is doubtful the rep even reports back to the superintendent.
- The Role of the High School Subcommittee
 - Because most high school superintendents do not attend, nor send their representatives, any information resulting from discussion or presentations does not get back to the DLTs.
 - What is the role of the High School Subcommittee, given the current structure?
- High School SLT support
 - High school superintendents are not providing SLT training to high schools.
 Who should provide this training? Some community superintendents invite high schools to their SLT training, but who is actually responsible?
 - General sense that many high school SLTs are not functioning properly.
 - Not clear whether high school superintendents are informing high school principals how to use Iplan portal and of the need to give parents access to the CEP in Iplan. How are high school parents and teachers being trained to use iplan?
 - High school superintendents are unaware of the results of the biennial survey, with no follow up expected at the high school level.
 - What is the role of the high school members of the DLT? They are sometimes not invited to sit in on elementary/middle school SLTs (part of DLT outreach or mediation efforts).
 - Central is trying to get signature pages for CEPs uploaded, but high schools are far behind district schools. Who is monitoring this? This is not the responsibility of the community superintendent.
- Need high school superintendents to work with the state to get high school data earlier. It is May 2017 and we still do not have access to 2015-2016 data. At least need access to preliminary data or what is the point?
- District Accountability
 - The district in held accountable and labeled for the performance of high schools leading to much frustration by the community superintendents whose districts are labeled focus and priority due to high schools.
 - DLT hoped to have a discussion about a renewal high school in the district since it was the reason the district was labeled a priority district, but obviously could not have this discussion.
 - Community superintendent has asked for years for the renewal high school's principal to regularly attend her DLT meeting – important given that this high school

is the reason her entire district is a focus district. She has never received a response to her requests.

- Renewal, priority, and focus high schools need to work with middle school parent coordinators in their districts to sell their schools, a key part of a turnaround strategy to boost high school enrollment but difficult given high school superintendency structure.
- Districts Are Obligated to Take on High Schools Responsibilities
 - Community superintendents must write high school sections of DCEPs
 - Districts are offering monthly training to parent coordinators and guidance counselors as part of action plan in support of DCEP, but high school parent coordinators and guidance counselors are under no obligation to attend.
 - Community superintendents are having to work to ensure the high schools goals are met. Especially true of district parent engagement goals and action plans. Little coordination with/support from high school superintendents.
 - Most PA/PTA training currently offered to high schools is coming from community district FLCs and FSCs, not high school FLCs and FSCs. But not consistently offered by anyone for high schools.
 - SLT and Title 1training is only done through DLTs and districts, which may or may not think to invite high schools. Many high schools are now offered no SLT training.
 - Efforts to get high schools to complete the biennial survey did not come from high school superintendents but from community superintendents. High school superintendents are unaware of the results of the surveys and how their school SLTs are performing.
 - DLTs, and therefore community superintendents, must intervene when high schools seek assistance from their DLT for their SLTs.

High School Infrastructure Issues

- Need to Construct High Schools
 - Construction is booming in Queens and other boroughs, but there is no one to advocate for the construction of new high schools.
 - Transfer High School: Members of the DLT felt strongly that their district needed a transfer high school located in their district, but there was no one in a position to advocate for them.
 - The proposed 2015-2019 capital plan (revised March 8, 2017) forecasts a need for 21,481 K-8 seats in Queens but just 6,880 high school seats, which doesn't cover current severe overcrowding in Queens (large class sizes and schools operating in shifts) which has forced thousands of Queens high school students to attend schools in other boroughs. Where will these elementary school students go?
 - Need to construct a large specialized high school in Queens. 70% of Bronx High School students come from Queens.
 - No overarching vision for high schools in each borough just a hodge-podge because no one is responsible for the big vision.
 - Need to construct new high schools near subway or major bus lines because can't assume parents will drive students to school.

- Overcrowding in High Schools
 - The DOE has no plan in place to address the severe overcrowding in many high schools, a problem that has been abundantly clear for years. But there is no Superintendent to fight for the construction of High Schools (as happens at the community district level for K-8 schools).
 - A UFT member expressed concern that severe overcrowding is eroding the reputation of his school and starting a downward cycle. Students don't want to attend overcrowded schools that operate in shifts.
 - One high school principal came to the DLT to seek assistance in addressing the jump in enrollment at his/her school that led to severe overcrowding. The high school was already holding multiple sessions, but the principal had to hold on to trailers slated for removal and convert a "book room" and gym into classrooms. The principal hoped the DLT could work with Enrollment to reduce pressure on high schools but there was no superintendent at the meeting to assist.
 - Another high school principal came seeking assistance: His/her high school is facing severe overcrowding. The school is at 150% of capacity with over 50% of students coming from outside the district.
 - Schools operating in shifts are far less able to offer after school programming open to all students.
 - Schools operating in shifts often claim that the 40 minutes/week of parent engagement does not apply to them.
- High Schools Lack Basic Facilities
 - Many high schools are located in converted warehouse or office space, lacking basic facilities.
 - Lack of adequate athletic space (including gym space) at many high schools make it more difficult to meet PE requirement and curtail sports programs at high school.
 Bad for college applications. Sports encourages many students to stay in school and maintain good grades makes it more likely for students to graduate.
 - Schools lack auditoriums
 - Schools lack libraries or access to libraries. Some parents report that in their colocated high school, library has been shuttered for years due to overcrowding (library used as classroom), or lack of funds to pay for librarian.
 - Lack of facilities has severe impact on types and quality of course offerings and after school programming (sports, theater, orchestra, choral groups, etc), making these schools less attractive to prospective students. No space to hold large meetings for students.
 - Parents, through their PA/PTA, must often spend thousands of dollars for gym and auditorium space to support sports programs, hold graduation, and even to have exams -- a financial burden not borne by schools with adequate facilities. This burden makes these schools less attractive to families. Shouldn't these schools receive additional funding to offset these costs?
 - Shouldn't schools without field space be given priority access to park department fields for practice and games?
- Small High Schools
 - Many schools are too small to offer sufficient course work to attract diverse students. Contributing to bifurcation of schools into "good" schools and "bad" schools

because funding is insufficient to offer college-prep coursework and still support struggling students.

- Many small schools are standalone, so DOE and high school superintendents need to think outside the box offer college-prep or remedial supports after regular school hours or on Saturday in programs offered to high school students throughout the district or borough.
- In small schools, teachers have to teach multiple courses while in larger schools, teachers can teach the same subject in multiple classes. A difficult burden.
- Some co-located schools have tried to integrate their programming, but thus far not very successful. Different bell schedule. Cumbersome.
- Co-located schools not good about sharing facilities (libraries, gym space, auditoriums).
- If the DOE is working with co-located schools to better share facilities and coursework, why not simply reintegrate them which would free up administrative space and funding?

Curriculum

- The High School Directory and School Finder program need to explicitly state the courses that schools offer and their various pathways to Regents and Advanced Regents diplomas to middle school students and families so they can make an informed decision in the high school application process.
- Underfunding of High Schools
 - Principals attended DLT to seek assistance and guidance and urge that this issue be discussed within the DOE, but there was no high school superintendent present.
 - Why are high schools routinely funded at 87% of fair student funding?
 - Because of severe budget shortfall, high schools have had to cut basic, college-prep curriculum (eg foreign language, physics) or make untenable choices (offering calculus vs statistics vs computer science).
 - PAs/PTAs are having to ask parents to contribute hundred, even thousands, of dollars to help cover the cost of basic programming at their schools.
 - Resources not provided so teachers can actually teach the curriculum.
 - Insufficient funding for consumables in science labs.
 - Why is high school funding lower than that of middle school and elementary school when need is actually GREATER.
 - Principal of renewal high school expressed concern that as high schools are removed from the renewal school list, they lose their funding
 - Puts tremendous pressure on schools to increase enrollment to make up for the funding, but difficult to attract students
 - So invited middle school guidance counselors to the school to showcase the school's strengths, but only two came.
 - Concerned about school's ability to maintain its turnaround given loss of funding and continued difficulty attracting students.
- Need to expand math courses offered in high schools
 - Providing more students with access to Algebra in 8th grade will expand the choice of high schools to which students can apply but high schools must also respond by

ensuring that students have access to 4-years of math past Algebra -- Calculus and other advanced math courses.

- College Prep Courses
 - Many of our high schools do not offer the courses that colleges expect to see for admission. Issue of inadequate funding and inability to find qualified teachers
 - 3-4 years of foreign language,
 - 3-4 years of high school math ending in calculus
 - 3-4 years of lab science
 - Many high schools are cutting foreign language, although colleges expect to see foreign language courses on transcripts, and students who do not take foreign language in high school will be required to take it in college a costly alternative.
- Dual language programs how to continue them through high school
- High schools and middle schools need to work together to ensure that curriculum is aligned, but impossible given current high school superintendency structure or burden of working to align programming falls entirely on community superintendent.
- Social Emotional Learning
 - Need to expand social/emotional DCEP goal to high schools, but need to work with high school superintendents -- this goal and action plan look different at the high school level.
 - Implementation of Restorative Justice is spotty needs more support.
 - Cyberbullying
 - Teen Suicide

Preparing Students for College Application Process

- Need more college counselors in high schools. Ratio of students to counselor is too high.
 - Need to begin working with parents and students much earlier to make clear the coursework and grades colleges expect to see.
- SAT/SAT Subject Test
 - SAT Day very successful, but many kids took the exam without ever having taken a practice exam.
 - College Board moved January test date to August, but there were no testing sites in the borough of Queens so students had to go to Manhattan and even New Jersey to take the exam. MUST be rectified for August 2018.

Special Needs Students

• IEPs shift dramatically from middle school to high school. There are not enough providers or time to get to all the kids. Who should parents turn to for support, especially when SETT support/SSD IEP team leaders leave a school? Often there is no platform for parents to learn what is happening. Emails requesting information and updates go unanswered. High school students may flounder when supports and services are simply stopped – what can schools and high school superintendents do to help these students recover?

- High school students are not receiving services required by their IEPs.
- Many high school general ed teachers do not believe they need to differentiate instruction to meet the needs of the special needs students, they are unaware of their students' disabilities, they do not request nor receive training on methods to support these students. Especially important as special needs students are mainstreamed.
- Many high school staff and gen ed teachers assume that a child with an IEP has a lower IQ than other gen ed students. They therefore assume poor performance by IEP students reflects the students' ability rather than weakness in instruction.
- Given the number of special needs students a high school general education teacher may teach in a day, need to summarize the IEP in one page, with disability, child's accommodations, and methods of instruction that will support each child. Unreasonable to assume a teacher will have the time to read and memorize the details of each IEP. Have to make it easier for teachers.
- Need to ensure that all high schools have an SSD coordinator who is known to parents and who arranges for SAT/AP/SAT Subject/ACT accommodations for students who need testing accommodations during the students' freshman year. No student should fall through the cracks.
- As mainstream high school students, need to ensure the leap is not too great. No sense putting high school students who cannot multiply into an honors trigonometry class or high school students at a third grade reading level into an honors high school English class.

ELL Students

• Need serious work on how best to serve new arrivals in high school. High school ELL issues never discussed at DLT meetings.....

Professional Development for Teachers

• High school issue: DOE has mandated professional development but there is not enough sub time in school budgets – and unfunded mandate. What should high schools do?

Universal Free Lunch

- Impact of Universal Free Lunch on Title 1. How will income data be collected? Will Title 1 funding be cut because lunch forms aren't turned in?
- Already problematic to get forms completed at high schools.

After School Programming

- DOE needs to work with UFT to devise plan for paying teachers for overseeing afterschool programming. In many schools, the burden of paying teachers for their time has fallen on PAs/PTAs, which many cannot afford, or teachers volunteer their time. DOE and UFT needs to come up with a plan. Middle schools received funding for this. Why not high schools?
- High schools need to provide afterschool/Saturday classes to provide struggling students additional support.
- High schools need to provide afterschool/Saturday classes for students who passed classes but failed Regents or who passed Regents but wish to retake the test to show mastery and gain a high score.

Parent Engagement

- Mandated 40 minutes/week of parent engagement is largely ignored at most high schools
- DLT members discussed difficulty in instituting 40 minutes/week in multi-session high schools
- Some principals inform parents that they are exempt from 40 minutes/week but without the presence of high school superintendents at the DLT, there was no way to fix this
- Are high school parents actually disengaged or are they not provided relevant reasons to come to school?
- Do high schools actually have a means of communicating with parents? (a valid email address? Phone number?) "Backpacking" is a waste of time at the high school level.