

City of New York

OFFICE OF THE COMPTROLLER

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MANAGEMENT AUDIT

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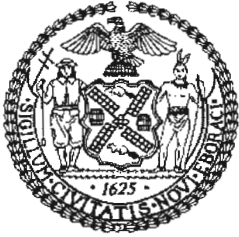
Deputy Comptroller for Audit

Audit Report on the
Performance of the Department of
Education's Children First Network 406

MG12-107A

April 25, 2013

<http://comptroller.nyc.gov>



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
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NEW YORK, N.Y. 10007-2341

John C. Liu
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April 25, 2013

To the Residents of the City of New York:

My office has audited the performance of the Department of Education's (DOE) Children First Network (CFN) 406. We audit City entities such as this to increase accountability and ensure compliance with regulations.

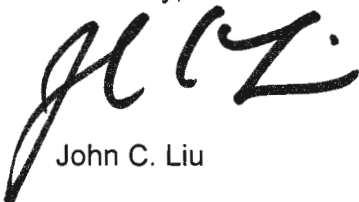
The audit found that CFN 406 provided instructional and operational support to its schools in accordance with DOE policies and procedures. However, it is difficult to determine whether the CFN's support increased the efficiency of the schools' day-to-day operations as was anticipated by some of DOE's expectations for the CFNs. Specifically, we are concerned with DOE's current evaluation structure and the way each component is being used to measure network performance.

To address these issues, the audit recommended that DOE: develop quantifiable criteria and standards that would allow it to determine whether there is a correlation between the schools' progress or lack thereof and the performance of the CFN; encourage the principals to fill out the entire Principal Satisfaction Survey and incorporate a comments section within the survey; and solicit feedback from other school officials who work with the CFNs, such as assistant principals and teachers.

The results of the audit have been discussed with DOE officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

If you have any questions concerning this report, please e-mail my audit bureau at audit@comptroller.nyc.gov.

Sincerely,



John C. Liu

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THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER MANAGEMENT AUDIT

Audit Report on the Performance of Department of Education's Children First Network 406

MG12-107A

AUDIT REPORT IN BRIEF

The New York City Department of Education (DOE) supports its schools through the Children First Networks (CFNs), which provide both instructional and operational support to the schools. Specifically, the CFNs provide professional development for principals and teachers; strategic intervention and planning for struggling schools; and targeted support for students with disabilities, English Language Learners, and under-represented student groups. In addition, CFNs assist schools with administrative tasks such as hiring teachers, carrying out daily operations, using data and technology, and fostering partnerships with community-based organizations and cultural institutions.

DOE evaluates network performance on an annual basis by using an evaluating structure that consists of four components: Progress Report, Quality Review, Qualitative Network Evaluation, and Principal Satisfaction Survey. The objective of this audit was to determine whether CFN 406 provides instructional and operational support to its schools in accordance with DOE policies and procedures.

Audit Finding and Conclusion

CFN 406 provided instructional and operational support to its schools in accordance with DOE policies and procedures. The CFN provided assistance to schools pertaining to educational planning, curriculum mapping¹, student work analysis, and quality review. In addition, CFN 406 offered professional development training to school personnel and provided operational support in a timely manner in areas such as attendance, suspension, health and safety compliance, and transportation services. Satisfaction with the services provided by CFN 406 was confirmed by the four school principals who we interviewed.

However, it is difficult to determine whether that support increased the efficiency of the schools' day-to-day operations as was anticipated by some of DOE's expectations for the CFNs. Specifically, we are concerned with DOE's current evaluation structure and the way each component is being used to measure network performance. For two of these components, the

¹ Curriculum mapping is a procedure for collecting and maintaining a database of the curriculum in a school and/or district.

Progress Report and the Quality Review, a network's contribution to the scores allotted to the schools cannot be directly ascertained. For another component, the Qualitative Network Evaluation, the evaluation is based primarily on activities planned by a network rather than the outcome or effectiveness of those activities. The remaining component, the Principal Satisfaction Survey, appears to be the best suited of the four to provide feedback on the work performed by a network. However, DOE is not sufficiently utilizing this tool.

Audit Recommendations

To address these issues, we made three recommendations. DOE should:

- Develop quantifiable criteria and standards that would allow it to determine whether there is a correlation between the schools' progress or lack thereof and the performance of the CFN.
- Encourage the principals to fill out the entire Principal Satisfaction Survey and incorporate a comments section within the survey.
- Solicit feedback from other school officials who work with the CFNs, such as assistant principals and teachers.

Agency Response

DOE officials agreed to implement two of the three recommendations in the report and disagreed with our recommendation to develop quantifiable criteria and standards, asserting that DOE already holds CFNs accountable for school performance through its annual Progress Reports and Quality Reviews. However, as discussed in the report, with its current evaluation structure, DOE cannot sufficiently correlate a school's progress to the performance of the CFN. As such, we continue to believe that DOE should develop criteria and standards that would allow it to make that correlation in its evaluation of CFN performance.

INTRODUCTION

Background

DOE consists of over 1,700 schools that serve approximately 1.1 million students each year. DOE supports its schools through the CFNs, which began in 2007 as a pilot program and was fully implemented Citywide in the spring of 2010. On average, a CFN consists of 15 individuals, with experience in various areas of education, who directly provide instructional and operational support to a group of approximately 25 schools². The DOE's Office of School Support (OSS) oversees the CFNs through its five clusters with each cluster managing approximately 12 networks. During School Year³ (SY) 2011-2012, DOE had a total of 59 CFNs.

According to the information on DOE's website, the ultimate goal of a CFN is "to streamline operations and build capacity within schools so school-based staff can focus their time on instruction and accelerate student achievement." This refers to both the operational and instructional aspects of the support provided by the CFN, whereby the CFN is responsible for ensuring that the day-to-day operations are efficient so that teachers can focus on assisting students to grow and develop in their curriculum. Specifically, the CFNs provide professional development for principals and teachers; strategic intervention and planning for struggling schools; and targeted support for students with disabilities, English Language Learners, and under-represented student groups. In addition, CFNs assist schools with administrative tasks such as hiring teachers, carrying out daily operations, using data and technology, and fostering partnerships with community-based organizations and cultural institutions.

In 2003, DOE consolidated the then 32 Community School Districts and five High School Districts into 10 geographically-based Regions which were intended to provide instructional support to the schools. In turn, the 10 Regions received operational support from the borough-based Regional Operations Centers. In 2007, DOE dissolved the Regions and principals were given the option of selecting a CFN⁴ that they wanted to join. During this time, the borough-based operations centers continued to provide operational support while superintendents remained the supervisors of principals. In 2010, DOE assigned responsibility for both instructional and operational support to the CFNs. At this point, the borough-based operations centers were closed and superintendents remained the supervisors of principals outside the CFN structure. Since that time, school principals have continued to select the CFN that they wanted to be affiliated with and each year they are given the option of joining a different CFN.

In 2010, DOE also developed a performance management structure to evaluate each network both quantitatively (i.e., student achievement and compliance items) and qualitatively (i.e., principal satisfaction). OSS evaluates the CFNs' performance on an annual basis and the CFNs are then ranked⁵, using the following four components that are intended to allow DOE to measure each CFN's long-term goals and assess whether the schools made actual progress while under a particular CFN:

² The number of schools within a CFN ranges from 14 to 33 schools.

³ The School Year starts on July 1 and ends on June 30 of the following year.

⁴ The CFN pilot program began as small teams of coaches providing instructional and youth development support to groups of about 25 schools that shared a philosophy or other affinity.

⁵ The following are the weights for the four components: Progress Report 45 percent, Quality Report 20 percent, Qualitative Network Evaluation 20 percent, and Principal Satisfaction Surveys 15 percent.

- 1) Progress Report, which is based on student progress, student performance, and school environment.
- 2) Quality Review, which is a two- or three-day review of a school by external educators who visit classrooms and interview school leaders.
- 3) Qualitative Network Evaluation, which is composed of three qualitative ratings: Instructional Quality and Talent Development; Core Functional Support; and School Improvement, School Choice, and Community Engagement.
- 4) Principal Satisfaction Survey, on which the principals are asked to express their views concerning the quality of the instructional and operational services provided by the CFNs.

This audit focused on CFN 406, which began operations in SY 2010-2011. For that year, CFN 406 was the third-largest CFN and serviced schools in all of the boroughs except Staten Island. During SY 2011-2012, CFN 406 supported 31 schools (16 elementary/middle schools and 15 high schools) and employed 19 staff with two leaders—one focused on providing services to elementary schools and the other to high schools. During SY 2010-2011, CFN 406 ranked 39th out of the 58 CFNs in existence⁶. As of July 2012, CFN 406 was reorganized and currently consists of 32 elementary and middle schools with only one leader in charge of the network.

Each CFN is funded by a combination of 70 percent City funds and 30 percent State funds. According to DOE, in addition to a school's base budget (Fair Student Funding), each school is allocated an annual fixed dollar amount (school support allocation) of \$50,000 to cover the operational cost⁷ of the CFN it has selected.

Objective

The objective of this audit was to determine whether CFN 406 provides instructional and operational support to its schools in accordance with DOE policies and procedures.

Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit was SY 2011-2012⁸. Please refer to the Detailed Scope and Methodology at the end of this report for the specific procedures and tests that were conducted.

Discussion of Audit Results

The matters covered in this report were discussed with DOE officials during and at the conclusion of this audit. A preliminary draft report was sent to DOE officials on February 13, 2013, and

⁶ As of the date of this report, the rankings for SY 2011-2012 were not yet available.

⁷ CFN staff are DOE employees; hence, the personnel costs are not part of the CFN's operational costs.

⁸ We also looked at information that, at the time our tests were conducted, was only available for SY 2010-2011.

discussed at an exit conference held on February 27, 2013. We submitted a draft report to DOE officials on March 12, 2013, with a request for comments. We received a written response from DOE officials on March 26, 2013. In their response, DOE officials agreed to implement two of the three recommendations in the report and disagreed with our recommendation to develop quantifiable criteria and standards, asserting that DOE already holds CFNs accountable for school performance through its annual Progress Reports and Quality Reviews. However, as discussed in the report, with its current evaluation structure, DOE cannot sufficiently correlate a school's progress to the performance of the CFN. As such, we continue to believe that DOE should develop criteria and standards that would allow it to make that correlation in its evaluation of CFN performance.

The full text of DOE's response is included as an addendum to this report.

FINDINGS AND RECOMMENDATIONS

CFN 406 provided instructional and operational support to its schools in accordance with DOE policies and procedures. The CFN provided assistance to schools pertaining to educational planning, curriculum mapping⁹, student work analysis, and quality review. In addition, CFN 406 offered professional development training to school personnel and provided operational support in a timely manner in areas such as attendance, suspension, health and safety compliance, and transportation services. Satisfaction with the services provided by CFN 406 was confirmed by the four school principals that we interviewed.

However, it is difficult to determine whether that support increased the efficiency of the schools' day-to-day operations as was anticipated by some of DOE's expectations for the CFNs. The criteria developed by DOE may not accurately measure the value of CFN services (in this case, those of CFN 406). DOE has developed an evaluation structure consisting of four components by which it rates the CFNs. However, we are concerned with the way each component is being used to measure network performance. For two of these components, the Progress Report and the Quality Review, a network's contribution to the scores allotted to the schools cannot be directly ascertained. For another component, the Qualitative Network Evaluation, the evaluation is based primarily on activities planned by a network rather than the outcome or effectiveness of those activities. The remaining component, the Principal Satisfaction Survey, appears to be the best suited of the four to provide feedback on the work performed by a network. However, DOE is not sufficiently utilizing this tool. DOE should expand and enhance its use of this tool so that it can improve the reliability of the data collected and help the CFNs improve their performance.

These issues are discussed in more detail below.

Instructional and Operational Support Provided by the Network

Our review of CFN 406's functions and day-to-day operations revealed that in an effort to meet the needs of the schools, the network provided both instructional and operational support to its schools. Both are discussed in more detail below.

Instructional Support

Part of a CFN's responsibilities regarding instructional support is to assist schools in preparing and submitting required reports and improve the results of key methods¹⁰ set to evaluate the progress and performance of both students and schools.

Our review of supporting documents, such as agendas and attendance sheets for professional development conferences, indicated that CFN 406 provided instructional support to its schools by offering school personnel professional development (which consisted of classes, training, and seminars) that covered a wide range of areas, such as English, Math, Special Education, Data Analysis, etc. In addition, staff from CFN 406 conducted school visits, performed teacher observations, and held inquiry team meetings with schools. Moreover, for the struggling¹¹ schools

⁹ Curriculum mapping is a procedure for collecting and maintaining a database of the curriculum in a school and/or district.

¹⁰ Such as Progress Reports, Quality Reviews, Comprehensive Educational Plans, etc.

¹¹ DOE defines struggling schools as those that receive a grade of D, F, or a third consecutive C or worse on their most recent Progress Report or a rating of Underdeveloped on their most recent Quality Review.

in our sample, we found that CFN 406 worked with the schools to identify weaknesses (such as literacy concerns due to a large number of English Language Learners) and provided individual support relevant to the needs of each of the schools. For example, CFN 406 provided additional coaching assistance targeting areas such as integrated co-teaching for Special Education and English Language Learners. CFN 406 also provided advice to principals and assisted schools in preparing newsletters designed to improve communication among schools, teachers, and parents.

Operational Support

CFN 406 offered a broad range of operational support, including but not limited to the following areas:

- Attendance: CFN 406 assigned three of its staff members (referred to as attendance teachers) the task of monitoring students' attendance in its 31 schools¹² Attendance Teachers. Our review of 820 action records¹³ for the period of September 8, 2011, to November 2, 2011, disclosed that the attendance teachers addressed the absence of 528 students 528 through 532 telephone calls 532, 144 home visits 144, 63 letters sent to students' parents 63, and 81 school conferences and meetings with parents 81 D.4.PR.G.
- Safety and Suspension: CFN 406 officials monitored incidents and suspensions through the Online Occurrence Reporting System (OORS) and then analyzed data for trends and spikes¹⁴ for the purpose of assisting schools in the creation of action plans geared towards the reduction of suspensions and the creation of safer and more productive learning environments OORS. We confirmed CFN 406's assistance in these areas when we met with school principals Suspension Support 1 Suspension Support 2.
- Health and Transportation: CFN 406 staff monitored the completion of various health-related requirements, such as immunizations and vision screenings, and periodically ran completion reports D.5.1. In doing so, the staff sent reminders for approaching deadlines and notifications for seminars or workshops D.5.PR.G. CFN 406 staff also assisted schools in addressing the needs related to bus transportation services, including notifications to parents and transportation providers pertaining to early pick-ups or special circumstances D.6.PR.G.

In addition to the above, in order to address the specific needs of the schools, CFN 406 established a procedure referred to as "Friday call-ins," where each staff member is assigned two to three schools that he/she is responsible for calling each Friday afternoon and speaking with the principals or any other school officials requiring assistance. The purpose is to increase accountability, allow the CFN to form relationships with its schools, and maintain an open and direct line of communication. CFN 406 officials view these scheduled calls as an opportunity to troubleshoot issues before they become major areas of concern. Any issues raised by the school are then discussed the following Monday at the regularly scheduled CFN staff meeting at which staff are redeployed to assist the schools. Based on the limited documentation that we received from the CFN, we were able to determine that CFN 406 staff made Friday phone calls to their

¹² The teachers monitored the attendance records through DOE's Automate the Schools computer system.

¹³ The action records consist of the following: attendance teacher name, date, action taken, confirmation, school code, student name, and ID.

¹⁴ Our review of the ORRS reports for 15 schools indicated that there were 2,724 incidents (ranging from 39 to 765 per school), and 1,803 suspensions (ranging from 28 to 426 per school) recorded for SY 2011-2012.

assigned schools. However, we could not determine whether these meetings took place on a regular basis or the extent of the assistance provided by the CFN¹⁵.

Limitations of the Network Performance Evaluating Structure

Our review of the four components upon which CFN performance is rated found areas of concern with the way each component is being used to measure that performance. As a result, the ratings given by DOE may not accurately reflect CFN 406's actual performance.

Based on our various discussions with DOE officials, we learned that DOE's expectation is for the CFNs to provide assistance to the schools in their respective networks in whatever capacity is required. As stated previously, DOE developed a performance management structure in 2010 to evaluate the networks' performance each year and ranks them based on the following four components:

- 1) Progress Report (45 percent of network's evaluation): Annual scores (i.e., A, B, C, D, or F) are provided by first comparing the school progress, student performance, and school environment of one school to a peer group of up to 40 schools with a similar student population and then to all schools Citywide.
- 2) Quality Review (20 percent of network's evaluation): This is a two- to three-day review of a school by external educators, who visit classrooms and interview school leaders. The process is designed to ascertain whether the school is engaged in effective methods of accelerating student learning and to help monitor and improve instructional and assessment practices.
- 3) Qualitative Network Evaluation (20 percent of network's evaluation): This measures network performance in the following areas: (a) Instructional Quality and Talent Development (which includes Teacher Effectiveness and Professional Learning as well as Leadership Development); (b) Core Functional Support (which includes Compliance and Crisis Management as well as Student Support); and (c) School Improvement, School Choice, and Community Engagement (which includes Support for Struggling Schools, Admissions, and Enrollment Support).
- 4) Principal Satisfaction Survey (15 percent of network's evaluation): This is conducted once or twice a year. The principals complete a survey rating their satisfaction with the support provided by the network team as a whole, individual team members, and central offices.

During SY 2010-2011¹⁶, CFN 406 ranked 39th of the 58 CFNs in existence during this period. However, three of the components in the current evaluation structure—Progress Reports, Quality Reviews, and Qualitative Network Evaluations—either do not reliably delineate the CFN's contribution to the component being measured or focus on activities of the CFN rather than on the impact of those activities. As a result of these weaknesses, we cannot assess the degree to which the CFN affected the efficiency of its schools.

¹⁵ The CFN provided us with three Friday Call-In Communication Plan forms (a template used to record the issues discussed over the phone) containing detailed notes from three staff members for call-ins in January 2012. The CFN also provided us with one agenda for a CFN Team Meeting held on a Monday (January 9, 2012). The first item on the agenda was "Friday Call-Ins."

¹⁶ As of the date of this report, the rankings for SY 2011-2012 were not yet available.

Progress Report and Quality Review

The scores obtained by a school on its Progress Report and Quality Review indicate student progress and school engagement in supporting student achievement. However, it is difficult to ascertain the impact that CFNs have on these scores. While the CFNs do endeavor to help schools achieve academic goals, DOE officials acknowledged that it is not possible to separate their impact from those of the schools' administrators, teachers, students, and parents.

According to CFN 406 officials, a school's Progress Report is an indicator of the collaborative efforts of the principal, teachers, and the network itself. Scores received by the schools affect 45 percent of a CFN's overall rating. However, the work performed by the CFN may not be evidenced in that particular school year. In fact, while CFN 406 officials agreed that a school's Progress Report does shed some light on the CFN's performance, they stated that it can sometimes take years to see the results of the collaborated efforts. As a result, the CFN's evaluation, as reflected by its score in the school's progress report, may not be a reliable measurement of the CFN's contribution in any given school year.

Regarding Quality Reviews, these are performed once every four years for schools with a Progress Report rating of A or B. Schools that have a Progress Report rating of F, D, or three consecutive C ratings, or that have a Quality Review rating of Underdeveloped, are mandated to have a Quality Review the following year. The implication of this evaluation structure is that if a school obtains a high score in its Progress Report, the CFN automatically receives credit for four consecutive years in the Quality Review aspect of its evaluation (which is 20 percent of the network's evaluation structure). Further complicating matters is the fact that as of July 2012, after only two years of operations, CFN 406 was reorganized. As a result, DOE may not be able to determine whether the CFN's long-term goals were accomplished or assess whether the schools made actual progress while under this particular CFN.

The Progress Report and the Quality Review comprise 65 percent of a CFN's evaluation. However, because both scores reflect a number of variables, which often are not immediately apparent or discernable, these two components may not be reliable measures of the CFN's performance. DOE officials acknowledge that a number of variables factor into the scores for these two evaluation components. In fact, they confirmed that it is not possible for the CFN to be solely responsible for the progress or lack thereof made by the schools.

Qualitative Network Evaluation

The Qualitative Network Evaluation, which is performed by OSS, comprises 20 percent of the CFN's overall score. However, the information submitted by the CFN in order to obtain the score is left up to the discretion of each CFN. CFN officials select the documents they believe best support their efforts to assist their schools.

DOE provided us with various examples of supporting documents for this component, including agendas for a range of sessions/meetings (such as professional development training sessions and personnel committee meetings), as well as various e-mail correspondence between school and CFN personnel. This component of the evaluation structure developed by DOE is based on activity rather than on the results of the activity. For example, the CFN might provide DOE with the agenda for a training seminar it provided to its schools that DOE factors into its network evaluation. However, the results of participant surveys (providing an indication of how helpful the seminar was to the attendees) might not be provided to DOE and factored into the evaluation. DOE has not created specific criteria that the CFNs are required to follow when submitting

documents to substantiate performance. DOE officials believe that due to the different needs of each school, it is not feasible to create standards that would apply to each CFN. According to DOE officials, the Qualitative Network Evaluation was a new component added to the evaluation structure during SY 2010-2011. DOE officials acknowledged that there is room for improvement within the process and stated that this is the reason that this component of the evaluation structure is being revised for upcoming school years.

Principal Satisfaction Survey

The Principal Satisfaction Survey is an important tool for DOE to seek feedback from the principals and to improve the quality of service that it provides to schools. DOE officials rely on the Principal Satisfaction Surveys to obtain a direct and first-hand view of a CFN's performance and stressed that satisfaction with services provided by CFNs is expressed via the surveys. However, our review of the survey questionnaires completed in the spring of 2011 revealed that not all principals participated in the survey and those who did participate did not answer all of the questions¹⁷. Increased participation reduces the risk that survey results may be skewed or misleading. In addition, there was no section for the principals to offer comments or provide additional feedback. Consequently, DOE may not develop a full overview of the CFN's performance, limiting the effectiveness of the survey. This concern was also shared by the CFN leaders, who felt that it would be beneficial to everyone involved if all school principals responded to the questionnaire. They also stressed the benefits of incorporating a comments section into the questionnaire. We believe that DOE would obtain an increased benefit by soliciting feedback from other affected parties at the schools served by the CFNs.

Overall, DOE's performance evaluation structure needs suitable measurable criteria in order to ascertain the degree of progress made by schools that can be directly attributed to the assistance provided by the CFNs. Without such criteria, DOE is hindered in its ability to hold a CFN accountable for lack of progress made by schools or conversely to provide credit to a CFN when such credit is due. DOE officials stated that they are in the process of revising the evaluation structure; however, this process was not completed by the time that this report was issued.

During the exit conference, DOE officials acknowledged that it was virtually impossible to isolate the CFN's contribution from the other variables and components responsible for the students' progress or lack thereof. Instead, they asked us to assist them in developing quantifiable criteria and standards to be used in evaluating CFN performance. We must decline the request because developing such criteria is the responsibility of management (i.e., DOE) and providing such assistance would be an impairment to our audit independence under Generally Accepted Government Auditing Standards (§3.34--§3.36).

Recommendations

DOE should:

1. Develop quantifiable criteria and standards that would allow it to determine whether there is a correlation between the schools' progress or lack thereof and the performance of the CFN.

DOE Response: DOE disagreed, stating: "The DOE currently holds CFNs accountable for the performance of the schools they support using the annual

¹⁷ According to the completed surveys that we reviewed, 78 percent of the principals appeared to be satisfied with the CFN's performance.

Progress Reports (which focus on progress made in a given school year) and Quality Reviews. Therefore, it is not necessary for the DOE to develop additional criteria or standards to measure the impact of the CFN on school performance.”

Auditor Comment: As previously stated, the scores in the Progress Reports do not necessarily correlate to the progress made in the particular year that the CFN is rated and the Quality Reviews are not performed annually for each school. Nevertheless, with its current measurement structure, DOE is attributing 65 percent of its evaluation score to two performance standards that often are not reflective of the CFN’s performance. Hence, we strongly encourage DOE to reconsider its response to our recommendation.

2. Encourage the principals to fill out the entire Principal Satisfaction Survey and incorporate a comments section within the survey.

DOE Response: DOE agreed, stating: “it has already been encouraging principals to complete the Principal Satisfaction Surveys, has achieved a high rate of response, and already provides multiple “open box” sections wherein principals may provide narrative comments and suggestions. We will continue to encourage principals to complete the entire survey and will continue to provide opportunities for narrative comments and suggestions.”

3. Solicit feedback from other school officials who work with the CFNs, such as assistant principals and teachers.

DOE Response: DOE agreed, stating: “the Progress Report already incorporates a Living Environment Survey that solicits feedback from other school stakeholders, including teachers, on matters that relate heavily to network support, including but not limited to professional development and the implementation of Common Core standards. We will continue to consider other opportunities to collect additional feedback from other school officials on network support.”

DETAILED SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit was SY 2011-2012¹⁸.

To gain an understanding of the CFN's functions, responsibilities, and day-to-day operations, we conducted walk-through meetings with CFN 406 co-leaders and staff members. We held a meeting with the cluster leader to understand the cluster's functions, responsibilities, and oversight of the CFN. In addition, we met with the Chief Executive Officer and the Senior Executive Director of the Office of School Support to obtain a better understanding of their monitoring of the clusters and CFNs, including the performance evaluation process.

We judgmentally selected the two elementary/middle schools and the two high schools with the highest and lowest Progress Report ratings and interviewed the schools' principals and assistant principals in order to gain an understanding of their perspectives regarding the support received from CFN 406. To ascertain whether the CFN provided professional development training and whether school personnel actually attended this training, we reviewed the respective agendas and attendance records for classes given from April to June 2011.

To identify whether CFN 406 provided assistance to struggling schools within its network, we first analyzed the Progress Report scores for all 31 schools and, based on DOE-established criteria, identified nine struggling schools within the CFN. We then met with the CFN co-leaders to discuss the challenges faced by each of the nine struggling schools during SY 2011-2012 as well as the steps the network had taken to address those challenges. We then judgmentally selected two of the nine schools and reviewed supporting documentation that indicated the assistance CFN 406 staff provided to these struggling schools.

To assess the degree of instructional support that CFN 406 provided to its schools, we randomly selected five of the 31 schools within the CFN. We then reviewed the goals¹⁹ set by the schools for SY 2010-2011 and their most recent Quality Reviews for the purpose of judgmentally selecting goals and recommendations to test. We then met with CFN 406 co-leaders and other officials to discuss and obtain supporting documents regarding the work performed to attain the goals and implement the recommendations. To assess the degree of operational support the CFN provided to its schools, we judgmentally selected five non-academic areas of service: attendance, safety, suspensions, health, and transportation. We reviewed reports, such as the Attendance Teacher Action Report, Safety and Suspension Report, Fitnessgram Completion Report, and Bus Service Report, to establish the CFN's assistance to the schools in these five areas.

To determine whether network officials responded to schools' requests in a timely manner and followed up on issues brought to their attention, we reviewed 20 sets of e-mails and notes for the

¹⁸ We also looked at information that, at the time that testing was conducted, was only available for SY 2010-2011 — for example, the CFNs' rankings.

¹⁹ These goals are set in each school's Comprehensive Educational Plan, which is required to be submitted to each school's superintendent on an annual basis.

month of January 2012. Of the 20 sets, nine (45 percent) were school-initiated and 11 (55 percent) were CFN-initiated. The documentation provided related to administrative, health, and safety concerns—it included Friday call-in notes, meeting agenda, deadline reminders, and seminar notifications.

Finally, in an attempt to determine the reasonableness and effectiveness of the network performance evaluation structure, we discussed the evaluation components with CFN officials and reviewed supporting documentation for the four components of the evaluation structure, which included the Progress Reports, Quality Reviews, Qualitative Network Evaluation, and Principal Satisfaction Surveys.

March 26, 2013

Ms. H. Tina Kim
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New York, NY 10007-2341

**Re: Audit Report on the Performance of the Department of Education's Children First Network
 406 – MG12-107A**

Dear Ms. Kim:

This letter will serve as the NYC Department of Education's (Department) formal response to the draft report (Report) by the New York City Office of the Comptroller (Comptroller) in its audit of the performance of the Department's Children First Network (CFN or Network) 406, to be included as an appendix to the Comptroller's final audit report.

The Department's School Support Structure

As part of a broad effort to empower principals, New York City's school support structure has evolved into one that is dynamic and responsive to an individual school and community needs. As of spring 2010, all schools receive their instructional and operational support from a team called a network. Network teams are made up primarily of experienced educators and professionals who bring expertise in specific areas such as instructional support, special education, school budgets, attendance, and student safety. Network teams support schools both in the field and from their offices around the city.

For the 2012-13 school year, principals partnered with one of 55 networks that best meets the needs of their students and school communities. Some networks focus on instructional models that support particular groups of students, such as high school students who are over-aged and under-credited. Others are organized around a particular area of expertise or philosophy, such as project-based learning or leadership development. Networks offer school communities an array of high-quality school support options and let them determine which will best serve their students, staff, and entire community.

Networks are organized into five clusters of about 11 networks each. Cluster teams oversee and support networks and work closely with the Department of Education's central leadership. Some networks are managed by a small group of Partnership Support Organizations, including New Visions, FHI 360, Fordham University, CUNY, and the CEI-PEA. All clusters and networks are overseen by the Office of School Support.

Children First Network 406

As noted in the Report, CFN 406 supported 31 schools and employed 17 staff with two network leaders during the audit year 2011-2012. The network leaders shared the operational support for all schools

within the network. Instructionally the work was divided, with one network leader focused on the network's 16 elementary/middle schools, and the other focused on the network's 15 high schools.

We are pleased that the Comptroller has concluded that CFN 406 provided instructional and operational support services in accordance with the Department's policies and procedures. We are also pleased to see that the Report describes the broad range of instructional and operational supports that the network provided to its schools, as evidenced by the supporting records we provided. The principals interviewed by the Comptroller's auditors all confirmed that they were satisfied with the support provided to them by CFN 406. On the whole, the Report identifies no concerns and makes no recommendations specific to CFN 406.

Network Performance Evaluation

The concerns cited in Report relate to the Department's process for evaluating and rating the performance of its networks. Because network ratings for school year 2011-2012 were not completed prior to the conclusion of the auditors' field work, the Report's findings and recommendations arise primarily from a review of the network performance evaluation process covering school year 2010-2011. The Report describes the four components of the Network Performance Evaluation: School Progress Reports, School Quality Reviews, Networks' Qualitative Evaluations, and the Principal Satisfaction Survey.

Progress Reports and Quality Reviews

Progress Reports are issued annually, shortly after the start of the school year. Each Progress Report is a one-year snapshot of a school's performance over the prior year. The methodology has evolved over time to account for feedback from schools and the community, changes in state policy, and higher standards for New York City schools. The Progress Report provides an overall assessment of the school's contribution to student learning in four main areas of measurement: (i) student progress, (ii) student performance, (iii) school environment, and (iv) closing the achievement gap. Beginning in school year 2011-2012, the Progress Reports for high schools also included an area on college and career readiness. Quality Review scores are based on an on-site Quality Review of a school by an experienced educator and are designed to measure how well a school is organized to support student achievement, with a focus on the instructional core, which sits at the heart of school improvement efforts. Through a rigorous evidence gathering process that includes classroom visits, teacher team observations and meetings with school stakeholders, the reviewer assesses the quality of three major categories of school performance: (i) instruction that prepares students for college and careers, (ii) school organization and management, and (iii) the learning environment for all building constituents.

As noted in the Report, many variables can impact the Progress Report and Quality Review scores of the schools supported by a network. While it is not possible to isolate the impact that the network itself has had on these measures of school quality and performance, our qualitative measures of network performance are highly correlated with the Progress Report and Quality Review scores of schools in a network. This indicates that we believe it is vital to hold networks accountable for the quality and performance of the schools they support. While the factors that impact the quality and performance of schools in a network are not wholly within a network's control, the network's explicit role is to support

schools in improving overall school performance. The Department clearly communicated to network staff that we expect their support to schools to drive improvement on these essential measures of school performance. Network performance is qualitatively evaluated based on a comprehensive rubric that outlines the primary responsibilities of networks, including work on rigorous academics, adult professional development, supporting struggling schools, access and support for all students, family and community engagement and operational services. All of these areas either directly support improved instruction or reduce other demands on schools, enabling them to focus on instruction. We have streamlined and increased the weight of qualitative evaluations that are continually tailored to better capture the influence of the network on its schools.

Qualitative Evaluations for Networks

The Qualitative Evaluation for networks first was developed by the Office of School Support for school year 2010-2011 to measure network performance in the key areas of instructional and operational support. Already at the conclusion of the first Qualitative Evaluation, the Office of School Support identified areas for improvement and has since continued to suss out and address such concerns annually in our revision process. We believe these revisions ameliorate the concerns cited in the Report, allowing us to more effectively measure the quality of the networks' affirmative work in supporting schools.

Whereas the first Qualitative Evaluation Rubric for network performance in 2010-2011 applied a simple and generic set of performance criteria to every workflow of the network, weighting these workflows by their relative importance to school improvement, the new rubric tool was much more efficient. Using the input of strong performers from the field, the 2011-12 Qualitative Evaluation Rubric was updated to account for an expanded set of workflows. Language was drafted to describe quality performance based on structures and outcomes at all different levels. The weights on workflows were reset for additional granularity. Finally, the method of executing network evaluations was overhauled. We included for the first time a citywide process of norming with all leaders to ensure that ratings were being applied evenly across clusters. These improvements and further revision efforts in the current school year addressed many of the concerns outlined in the Report.

Principal Satisfaction Surveys

We certainly share the Comptroller's view that the Principal Satisfaction Survey is an important tool in the Department's assessments of the quality of instructional and operational support to schools provided by networks. While the response rate to our Principal Satisfaction Survey of 76 percent is very high by national survey standards, we of course would like to see as many principals complete the survey as possible. The Principal Satisfaction Survey does include a number of "open box" sections wherein principals may provide narrative comments and suggestions. While the Principal Satisfaction Survey itself is focused solely on principals, the Department does solicit feedback from other school staff in its Learning Environment Surveys, which are incorporated into the Progress Report and therefore into the network performance evaluation process.

Response to Recommendations

1. *DOE should develop quantifiable criteria and standards that would allow it to determine whether there is a correlation between the schools' progress or lack thereof and the performance of the CFN.*

By design, CFNs drive improved performance in schools. A CFNs' primary functions are to support improved instruction, reduce administrative demands on schools so that schools can focus on academic performance, and provide cross-functional operational support to maximize resources at the school level. If a school is performing highly or poorly, at least part of that performance is attributable to the CFN's contributions. The DOE currently holds CFNs accountable for the performance of the schools they support using the annual Progress Reports (which focus on progress made in a given school year) and Quality Reviews. Therefore, it is not necessary for the DOE to develop additional criteria or standards to measure the impact of the CFN on school performance.

Moreover, the DOE could not create an evaluation tool that would be able to reliably isolate the impact of a CFN on students' academic progress from the other factors that impact that progress, such as the principal/administration, teachers, and student and parent population. We believe that the Network Qualitative Evaluation, with the recent enhancements described above, provides a rubric for more effectively measuring a CFN's specific affirmative contributions to the schools it serves.

2. *DOE should encourage the principals to fill out the entire Principal Satisfaction Survey and incorporate a comments section with the survey.*

The Department agrees with the recommendation but would like to reiterate that it has already been encouraging principals to complete the Principal Satisfaction Surveys, has achieved a high rate of response, and already provides multiple "open box" sections wherein principals may provide narrative comments and suggestions. We will continue to encourage principals to complete the entire survey and will continue to provide opportunities for narrative comments and suggestions.

3. *DOE should solicit feedback from other school officials who work with the CFN's, such as assistant principals and teachers.*

The Department agrees with the recommendation but notes that the Progress Report already incorporates a Living Environment Survey that solicits feedback from other school stakeholders, including teachers, on matters that relate heavily to network support, including but not limited to professional development and the implementation of Common Core standards. We will continue to consider other opportunities to collect additional feedback from other school officials on network support.

Sincerely,



Shael Suransky
Chief Academic Officer