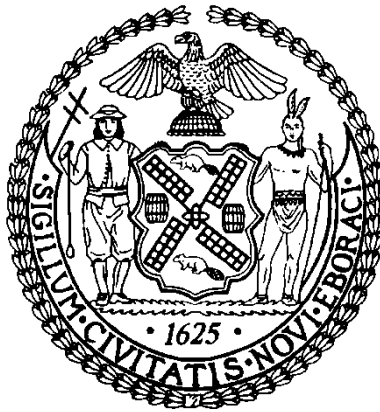


**CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER**

**John C. Liu  
COMPTROLLER**

**MANAGEMENT AUDIT**

**H. Tina Kim  
Deputy Comptroller for Audit**



**Audit Report on the  
Department of Education's  
Controls over High School Progress Reports**

*MJ10-133A*

**May 13, 2011**



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

John C. Liu  
COMPTROLLER

May 13, 2011

**Dear Residents of the City of New York:**

My office has audited the Department of Education's (DOE) controls to ensure that data reflected in the annual high school progress reports are consistent (faithfully represents the data recorded in the DOE databases from which it was derived), comparable (provides a clear frame of reference for assessing performance and information is measured uniformly and reported consistently from period to period), and understandable so that stakeholders can reasonably rely on the progress reports for decision-making purposes. We audit City entities such as this as a means of ensuring the accuracy and transparency of agency-reported information.

The audit determined that DOE maintained adequate controls to ensure that the data reflected in the 2008-2009 high school progress reports were consistent. With regard to the characteristics of comparability and fairness in reporting, however, DOE has made a number of modifications that hindered one's ability to effectively use the reports to assess a school's performance over a period of years. Further, the audit determined that sufficient documentation was available for audit purposes to provide reasonable assurance that the audited student data was representative of the data recorded in DOE's databases. However, there were instances where hard-copy student files and/or Regents exam documentation were not available to the auditors.

This audit did not assess the accuracy of student course grades and other information recorded in the DOE databases or in source documentation. The audit also did not attest to the appropriateness of specific attributes measured therein or determine whether there are other attributes better able to measure student progress and school performance. These matters were considered outside the scope of this audit.

The audit made 10 recommendations, including that DOE should: (1) consider including a pro-forma disclosure in the progress reports and/or supplemental information to demonstrate the effect of significant changes in calculations or other metrics on prior years; if such a restatement is not feasible, DOE should determine a means for users to effectively compare current changes retrospectively to better enable year-to-year comparisons; (2) perform periodic, independent audits of student data to provide reasonable assurance of its accuracy and reliability; and (3) ensure that student records, Regents exam documentation, and other relevant student information are appropriately tracked and retained by the schools as required.

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 email my audit bureau at [audit@comptroller.nyc.gov](mailto:audit@comptroller.nyc.gov).

Sincerely,

A handwritten signature in black ink that reads "JCL".

John C. Liu

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*The City of New York  
Office of the Comptroller  
Management Audit*

**Audit Report on the Department of Education's  
Controls over High School Progress Reports**

**MJ10-133A**

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**AUDIT REPORT IN BRIEF**

In the 2006-2007 school year, the Department of Education (DOE) implemented annual School Progress Reports for the purpose of creating greater accountability, establishing expectations, and uniformly measuring and comparing school progress. The progress reports reflect letter grades (A, B, C, D, or F) that rate how each of the City's public schools is performing. For high schools, overall scores are based on three general areas: student progress, student performance, and school environment. Since their implementation, DOE has used the progress reports as an integral part of rewarding high performing schools and for identifying chronically low performing schools for restructuring or closure.

This audit determined whether DOE maintained adequate controls to ensure that data reflected in the annual high school progress reports are reliable (faithfully represents the data recorded in the DOE databases from which it was derived), comparable (provides a clear frame of reference for assessing performance and information is measured uniformly and reported consistently from period to period), and understandable so that stakeholders (i.e., parents, educators, school officials, legislators, etc.) could reasonably rely on the progress reports for decision-making purposes. This audit did not assess the accuracy of student course grades and test scores awarded by teachers and recorded in the DOE databases or in source documentation. The audit also did not attest to the appropriateness of specific attributes measured therein or determine whether there are other attributes better able to measure student progress and school performance. These matters were considered outside the scope of this audit.

**Audit Findings and Conclusions**

The audit determined that DOE maintained adequate controls to ensure that the data reflected in the 2008-2009 high school progress reports were reliable. The audited data elements used in preparing the reports were (with some minor exceptions) verifiable and representative of student data recorded in DOE's computer databases. With regard to the characteristics of comparability and fairness in reporting, however, DOE has made a number of modifications in underlying attributes, weights, and/or grade scales (i.e., diploma weights, peer groupings, and cut scores) used to calculate peer indexes and measure performance. These changes may hinder one's ability to effectively use the reports to assess a school's performance over a period of years.

Further, although we determined that sufficient documentation was available for audit purposes to provide reasonable assurance that the audited student data was representative of the data recorded in DOE's databases, there were some instances where hard-copy student files and/or Regents exam documentation were not available for our review.

### **Audit Recommendations**

The audit made 10 recommendations, including that DOE should:

- Consider including a pro-forma disclosure in the progress reports and/or supplemental information to demonstrate the effect of significant changes in peer group calculations, changes in cut scores, or other metrics on prior years. If such a restatement is not feasible, DOE should determine a means for users to effectively compare current changes retrospectively to better enable year-to-year comparisons.
- Perform periodic, independent audits of student data to provide reasonable assurance of its accuracy and reliability.
- Ensure that student records, Regents exam documentation, and other relevant student information are appropriately tracked and retained by the schools as required.

### **DOE Response**

We received a written response from DOE officials on April 18, 2011. In their response, DOE officials generally agreed with most (nine out of 10) of the audit's recommendations and partially agreed with the remaining one.

## INTRODUCTION

### Background

The New York City Department of Education (DOE) is the largest public school system in the United States. It provides primary and secondary education for more than one million students from pre-kindergarten through grade 12. DOE is responsible for preparing high school students to pass State Regents exams and meet graduation requirements.

In the 2006-2007 school year DOE implemented annual School Progress Reports—a citywide school evaluation and performance management tool. According to DOE, the purpose of the progress reports is to create greater accountability, establish expectations, and uniformly measure and compare school progress. The progress reports are designed to help parents compare schools to peer schools with similar student populations. They also hold schools accountable for student achievement and enable schools to chart a course of action to improve student learning.

Since their implementation, DOE has used the progress reports as an integral part of rewarding high performing schools and for identifying chronically low performing schools for restructuring or closure. This audit sought to assess the reliability of data used in calculating and compiling high school progress reports to gain assurance that stakeholders (i.e., parents, educators, school officials, legislators, etc.) could reasonably rely on the progress reports for decision-making purposes.

DOE's Division of Performance and Accountability<sup>1</sup> is responsible for developing and managing school progress reports as well as handling school evaluations, surveys, quality reviews, and providing data, tools, and resources needed to improve schools and support student learning. The division's School Performance Unit (SPU) is directly responsible for compiling and processing student and school data, establishing letter grade parameters, and generating the annual school progress reports.

With regard to high schools, DOE uses two computer systems to record and track student data: the Automate-the-Schools (ATS) system and the High School Scheduling and Transcript database—also referred to as the Scheduling, Transcripts, and Academic Reporting System—(HSST/STARS). ATS is a school-based administrative system used to record and track students' biographical, admission, discharge, transfer, attendance, grade promotion, and exam data. HSST/STARS is used at the school level for student class scheduling and for recording and tracking student grades and transcript data. Each school is responsible for the accuracy of the student data it records in these databases. The SPU extracts copies of relevant student data from the two systems to calculate school scores and generate the annual high school progress reports.

In September, after student grades (including summer school grades) are finalized for the previous school year, the SPU extracts pertinent student data from ATS and HSST/STARS,

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<sup>1</sup> According to DOE officials, as of February 2011 the Division of Performance and Accountability was renamed the Division of Academics, Performance and Support pursuant to the expansion of its duties and restructuring.

processes it, and creates a preliminary progress report data file (preliminary workbook) for each school. The workbook lists each of the school's students and the relevant attributes, grades, metrics, and underlying calculations used in determining scores and generating the progress reports. The SPU emails to each high school a copy of its preliminary workbook for review. The schools have a period of approximately two weeks to verify the information and correct missing and/or inconsistent data (i.e., student grades, Regents scores, etc.) and to ensure the data are accurate and complete. The schools make any required changes or corrections directly in ATS and HSST/STARS. Subsequently, the SPU performs another data extract and creates an unofficial workbook and progress report for each school. The unofficial reports become the official progress reports that the SPU releases and posts to the DOE website in November each year.<sup>2</sup>

The progress reports reflect letter grades (A, B, C, D, or F) that rate how each of the City's public schools is performing, identify each school's strengths and weaknesses, and provide an overall assessment of each school's contribution to student learning. The letter grade assigned to each school is based on a combined numeric raw score (up to 100 points) derived from multiple metrics for each of three performance areas; student progress, student performance, and school environment. Schools with high-needs student populations may earn additional credit (up to 16 additional "bonus" points) for exemplary progress, such as gains made by students in the lowest third citywide who pass English and math Regents with a 75 or higher or who graduate with certain types of diplomas.

For high schools, student progress scores represent 60 percent of a school's overall raw score. It considers student credit accumulation at the end of 9th, 10th, and 11th grade along with student Regents completion and pass rates. Credit data is based on the grades teachers assign to students. Student performance accounts for 25 percent of the overall score and is based on the four- and six-year graduation and diploma rates. The school environment score constitutes 15 percent of the overall score and measures attendance and the results of parent, student, and teacher surveys. The SPU determines the parameters (cut scores) for assigning letter grades based on citywide school performance and other factors.

A school's overall raw score and those for each of the three measured areas are compared primarily to schools in its peer group as well as to all schools citywide. DOE has identified the progress report grades as one of the key factors used to identify and recommend schools for corrective action or for closure.

### **Audit Objective**

The objective of the audit was to determine whether DOE maintained adequate controls to ensure that data reflected in the annual high school progress reports are:

- reliable—verifiable and faithfully represents the data recorded in computer systems from which it was derived;

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<sup>2</sup> According to DOE, following the issuance of the unofficial progress reports but prior to the public release of the official reports, schools have a final opportunity to appeal their grade; however, this a rare occurrence.

- comparable—provides a clear frame of reference for assessing performance, reported information is measured uniformly and reported consistently from period to period; and
- reported fairly—results are communicated in a clear, understandable manner, and include explanations and interpretations to help users comprehend the information.

### **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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. 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 audit scope covered high school progress reports for the 2008-2009 school year, which, at the time the audit was initiated, represented the most recent progress reports issued and the most recent school year ended for which source documentation was available for audit testing. To perform certain tests we expanded the audit scope to include progress reports for school years 2006-2007, 2007-2008, and 2009-2010.

This audit included a review of relevant control procedures and an assessment of progress reports to determine whether: (1) the student data used in generating the progress reports could be traced to data recorded in HSST/STARS, ATS, and (on a limited basis) to source documentation at the schools; (2) the measures used in calculating school scores were uniformly applied among schools; and (3) the reports were clear and understandable to users. This audit did not assess the accuracy of student course grades and test scores awarded by teachers and recorded in the DOE databases or in source documentation. Nor did it evaluate the construct of the progress reports, attest to the appropriateness of specific attributes measured therein, or determine whether there are other attributes better able to measure student progress and school performance. These matters were considered outside the audit scope.

To accomplish our objective we carried out the following procedures:

To understand DOE's general roles and responsibilities pertaining to the area under audit, identify applicable criteria, and familiarize ourselves with DOE's high school progress reports and similar assessment models, we reviewed provisions of relevant Federal, State, and City rules regulations, standards, and DOE Chancellor's Regulations. We also reviewed various reports, publications, memoranda, and other relevant materials obtained from DOE officials, the DOE web site, and other sources.



## Evaluation of Controls

To assess DOE's controls over the handing, processing, and reporting of student data, we used relevant DOE operating procedures as criteria. Where formal procedures were not available, we conducted walk-throughs, documented our understanding, and obtained verification of relevant procedures and processes from DOE officials. We also used the following as audit criteria:

- Comptroller's Directive #1, "Principles of Internal Controls," and Agency Self-assessment Questionnaire;
- Comptroller's Directive #18, "Guidelines for the Management, Protection, and Control of Agency Information and Information Processing Systems;"
- Chancellor's Regulation A-820, "Confidentiality and Release of Student Records; Records Retention;"
- New York State Education Department, "Records Retention and Disposition Schedule ED-1;" and
- Department of Information Technology and Telecommunications (DoITT), "Citywide User Responsibilities Policy" (July 28, 2008, Version 1.2).

Further, we referred to Government Accounting and Standards Board (GASB) Concept Statements No. 2 and No. 5, "Service Efforts and Accomplishment (SEA) Reporting," and GASB "Suggested Guidelines for Voluntary Reporting: SEA Performance Information" (Suggested Guidelines), issued June 2010, to evaluate the qualitative characteristics of performance information presented in the high school progress reports.<sup>3</sup>

As part of our review of DOE's control environment, we interviewed officials, conducted walk-throughs and observations of relevant processes, and reviewed the agency's self-assessment of its internal controls covering calendar years 2008 and 2009, performed in compliance with New York City Comptroller's Directive #1. We also reviewed a previous audit report of DOE high school graduation rates conducted by the Comptroller's Office,<sup>4</sup> and noted findings and conditions in that audit that addressed matters relevant to this audit.

To understand the ATS and HSST/STARS computer systems, we reviewed training and instructional manuals along with other related documentation. On a limited basis, we evaluated the general controls and support for the applications through interviews with relevant DOE officials.

To evaluate the controls over and processing of student data (electronic and hard-copy documentation) and controls over ATS and HSST/STARS at the school level, we judgmentally selected a sample of 10 high schools (see Appendix A) from a population of 308 schools that

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<sup>3</sup> GASB Concept Statements 2 and 5 establish that performance information should possess the qualitative characteristics of relevance, understandability, comparability, timeliness, consistency, and reliability.

<sup>4</sup> Office of the New York City Comptroller, *Audit Report on the Department of Education's Calculation of High School Graduation Rates* (#ME09-065A, issued July 21, 2009).

serviced grades 9-12 students during the 2008-2009 school year.<sup>5</sup> These schools received letter grades on their progress reports for the same period. We stratified the 308 schools by borough and student enrollment and judgmentally selected for audit tests one small school and one large school from each borough based on the median student population of schools in each borough.

Three of the 10 schools were lower-performing schools recommended for phase-out closure in January 2010. From the population of 13,741 students at the 10 sampled schools for the 2008-2009 school year, we randomly selected a sample of 400 students, 10 from each of grades 9-12 (for a total of 40 students) per sampled school.<sup>6</sup>

Between April 21, 2010, and May 27, 2010, we visited the 10 sampled high schools where we interviewed principals, assistant principals, program chairs, teachers, data specialists, and persons responsible for updating student records in ATS and HSST/STARS. During these interviews, we assessed relevant controls and procedures over the processing, recording, and modifying of student data (i.e., grades, credits, Regents exam scores, etc.). Further, we reviewed and copied available source documentation from students' permanent records (e.g., transcripts, ethnic identification forms, etc.) along with applicable 2008-2009 Regents exam answer booklets and summary score-sheets for the 400 sampled students. We obtained various ATS and HSST/STARS printouts, including student report cards and transcripts to use in data reliability tests (discussed below). We also assessed school officials' concerns and comments regarding the progress reports.

To evaluate the SPU's controls over the processing and generation of annual progress reports, we reviewed relevant procedures, interviewed SPU officials, and conducted walk-throughs of the processing of student data and generation of progress reports for the 2009-2010 school year. In addition, we reviewed the SPU's quality assurance techniques and processes to identify potentially questionable school performance outcomes. We also obtained for audit testing the preliminary and unofficial workbooks used in producing the 2008-2009 progress reports for the 10 sampled high schools.

Overall, we evaluated the adequacy, reasonability, and consistency of established control procedures. We also determined whether there was adequate segregation of duties and supervisory review at each point of handling and processing student data and in generating the high school progress reports. Our assessment of controls at the 10 sampled high schools provided only limited assurance, however, about the application and effectiveness of those controls across all of the City's high schools due to the individual nature of each school's management structure and personnel.

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<sup>5</sup> Based on DOE statistics, there were 478 public schools in the City with 317,555 students enrolled in grades 9-12, during the 2008-2009 school year. After excluding schools in Chancellor's District 75 (Special Education) and District 79 (Alternative Schools and Programs) and high schools already undergoing phase out, we identified a population of 308 schools with 274,450 students in grades 9-12.

<sup>6</sup> Students with more than four years of high school attendance (did not graduate with their four-year cohort) were included with all 4<sup>th</sup> year students.

## Evaluation of Data Reliability

To assess the completeness and reliability of ATS and HSST/STARS and the data used to generate the 2008-2009 progress reports, we compared selected student data recorded in source documents for the sampled students to ATS and HSST/STARS and the data extracts (workbooks). We compared the Regents scores appearing on HSST/STARS transcripts to the test booklets and score sheets for the 2008-2009 Regents exams taken by the 400 sampled students. We determined whether the schools provided all applicable exam booklets. We also ascertained whether the test scores for the sampled students matched those recorded in HSST/STARS and the unofficial workbooks for the 10 sampled schools. Based on the results of that test, we compared information from available ethnicity forms and select data recorded in the ATS database (i.e., special education status and English language learner status) to the unofficial workbooks for 100 of the 400 sampled students (or 10 of the 40 sampled students at each of the 10 sampled schools).<sup>7</sup>

We compared the quantity and description of data columns and formulas used in the preliminary workbook to those in the unofficial workbook for each of the 10 sampled schools to assess consistency of the metrics used in creating the high school progress reports. We also compared all data elements in the preliminary workbook to the unofficial workbook for each sampled school and identified the frequency of changes between the preliminary and unofficial workbooks. For changes applicable to sampled students, we followed up with DOE for verification of those changes. Using each school's progress report modeler, we evaluated whether the identified changes had a significant effect on the overall progress report score and letter grade for the 2008-2009 school year. From this test, we also ascertained whether there were any indications of data being manipulated to unfairly alter a school's overall progress report score and grade.

To assess comparability, we compared the progress reports for the 10 sampled schools and/or supplemental information for the school years 2006-2007 through 2009-2010. We ascertained whether any significant changes were made in the report structure, metrics, and weights used in the reports to affect scoring. We also evaluated the progress reports for consistency, relevance, and uniformity of measured attributes. Further, we reviewed changes in certain progress report elements from year to year, particularly the peer index and cut scores, and attempted to evaluate the effect of those changes on the sampled schools letter grades over the four-year period, based solely on the individual measure.

To determine whether the progress reports were reported fairly, we evaluated the information contained therein along with supplemental information (i.e., Educator's Guide) and ascertained whether the information was clear, understandable, and presented in a manner to provide assurance that interested parties could make fair comparisons and informed decisions.

We conducted a survey of 30 randomly selected high school principals to assess whether SPU officials communicated with and obtained feedback to proposed changes to the progress

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<sup>7</sup> Based on the high rate of accuracy between source documentation and the HSST database regarding applicable Regents exam scores for the 400 sampled students, we limited our test of ATS to 100 of the 400 (every 4<sup>th</sup>) students. We planned to expand the testing if a high rate of errors was found to exist.

reports and whether such feedback was taken into consideration relevant to finalizing proposed changes. Further, we met with the Division of Performance and Accountability's Portfolio Planning Unit to assess the unit's reliance on and uses of the progress reports in determining strategies and actions to take to address lower performing schools.

Our audit samples were not selected in a manner to enable the projection of test results to their respective populations. Nevertheless, the sample test results provided a reasonable basis for assessing the adequacy of DOE's controls over and reliability of data used in calculating and compiling high school progress reports.

### **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 and discussed at an exit conference held on March 23, 2011. On March 25, 2011, we submitted a draft report to DOE officials with a request for comments. We received a written response from DOE officials on April 18, 2011. In their response, DOE officials generally agreed with nine of the audit's 10 recommendations and partially agreed with one.

We are pleased that DOE agreed with most of the audit recommendations. However, we are concerned that in its rather lengthy response, DOE inappropriately misinterpreted, and even exaggerated, many of the audit's "positive" conclusions as an endorsement for the progress reports, while simultaneously discounting control weaknesses disclosed herein.

For example, DOE stated: "In summary, the Department is pleased with the Comptroller's conclusions that the Progress Reports are reliable, relevant evaluations of school quality that are consistently applied to schools in a given year." In this statement, DOE inappropriately credits comments that we specifically attributed to the underlying data used in promulgating the progress reports to the reports themselves.

As stated earlier, one of the objectives of this audit was to assess the reliability of data used in calculating and compiling the high school progress reports, not, as DOE states, the reliability of the reports. In assessing reliability, the audit determined whether the data used in developing the progress reports was representative of the data recorded in the DOE databases from which it was derived. This audit did *not* assess the accuracy of the information recorded in those databases. Additionally, this audit did not evaluate the construct of the progress reports, assess their appropriateness as a performance management tool, or determine whether there are other tools or models better able to measure student progress and school performance.

With regard to the limitations of comparability of progress report scores over time due to changes in peer index calculations, methodology, and cut scores, DOE embellished certain audit statements in its response to bolster its position and discount the finding. For example, DOE stated: "Notwithstanding the changes in methodology the Department has made over time, high school Progress Report scores have been remarkably stable. Analysis the Department shared with the Comptroller shows that the correlation between an individual high school's Progress Report score from one year to the next is *extremely high*." [Emphasis added]

The analysis to which DOE refers suggests a correlation (strength or certainty) between one year's scores in predicting the next year's scores. Specifically, during our audit fieldwork, DOE noted that the 2007-2008 progress report scores were 73 percent certain in predicting those for 2008-2009. Similarly, it noted that the 2008-2009 progress report scores were 65 percent certain in predicting the 2009-2010 scores. Whether or not these percentages demonstrate an "extremely high" correlation is a matter of opinion. (We must note that our own analysis of the correlation between the 2007-2008 and 2009-2010 scores revealed that the 2007-2008 scores were only 53 percent certain in predicting the 2009-2010 scores.) Plainly, we do not agree with DOE's assessment. Notwithstanding, the predictive value of one year's score to another, does not, as DOE appears to suggest, explain the effect of changes to the peer index or cut scores on a school's overall score and grade.

Further, in another example of DOE's misstatement of audit conclusions, DOE stated: "The Comptroller *strongly commended* the Department for initiating internal audits of performance data in selected high schools . . ." [Emphasis added]. Specifically, we commended DOE for its "efforts to enhance credibility" through its planned audit initiative. However, no audits have yet been initiated as DOE suggests. Rather, the audits are planned to begin in the summer of 2011.

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

## FINDINGS AND RECOMMENDATIONS

DOE maintained adequate controls to ensure that the data reflected in its progress reports are reliable. With regard to the characteristics of comparability and fairness in reporting, however, DOE has made a number of modifications that may impact one's ability to effectively use the reports to assess a school's performance over a period of years.

As to *reliability*, we determined that the audited data elements appearing in the preliminary and unofficial workbooks (the basis for the progress reports posted to the DOE website) prepared by SPU were (with some minor exceptions) verifiable and representative of student data recorded in ATS and HSST/STARS.

As to *comparability*, the data used and attributes measured in the 2008-2009 high school progress reports were consistently applied among high schools and relevant. DOE has made a number of changes since the inception of the progress reports in underlying attributes, weights, and/or grade scales (i.e., diploma weights, peer groupings, and cut scores) used to calculate the peer index and measure school performance. The effect of these changes on year-to-year comparisons, however, has not been determined by DOE. Consequently, users of the progress reports may not be able to use them to effectively compare a single school's progress over the years.

As to the *fairness in reporting*, the presentation of data in the progress reports was determined to be clear and understandable. However, as was the case with comparability, the reports and supplemental materials did not sufficiently disclose or demonstrate the effect of changes in weights, attributes, and measures that may have impacted year-to-year comparisons of performance outcomes. Considering the broad audience of users and the reliance placed upon the progress reports, DOE could only improve the understandability of future reports by including additional information on year-to-year changes that affect schools' overall performance assessment.

Further, although we determined that sufficient documentation was available for audit purposes to provide reasonable assurance that the audited student data was representative of the data recorded in DOE's databases, there were some instances where hard-copy student files and/or Regents exam documentation were not available for our review.

These matters are discussed in greater detail below.

### **Mixed Results on Comparability**

As to *comparability*, we determined that the data used and attributes measured in the 2008-2009 high school progress reports were consistently applied among high schools, which allowed for comparisons between schools in a given year. However, ongoing changes in underlying attributes, weights and/or grade scales (i.e., diploma weights, peer groupings, and cut scores) limit the comparison of schools performance outcomes from year to year.

GASB Concept Statements No. 2, No. 5, and Suggested Guidelines establish that performance information should provide a clear frame of reference for assessing performance of the entity. Performance information should be measured and reported consistently from period to period to allow users to have a basis for comparing performance over time and to gain an understanding of the measures being used and their meaning. If performance measures are modified or replaced or the manner of the presentation is changed it is important to communicate to users that a change has occurred and the reasons for the change.

We determined that the data used and attributes measured in the 2008-2009 high school progress reports were timely, relevant, and consistently applied among high schools. Further, we noted that high-level elements were generally consistent with previous reporting periods. For example, the weights of the measured areas that comprise a school's overall score remained constant from 2007-2008 through 2009-2010. Student progress accounted for 60 percent; student performance accounted for 25 percent; and school environment accounted for 15 percent.

However, as reflected in Appendix B, DOE has made a number of changes over the years in some of the underlying attributes, weights, and/or calculations that are used in calculating the peer indices and measuring school performance. While DOE deemed these changes necessary to reflect dynamic situations and/or to refine the process of measuring school performance, the agency has not determined the impact of these changes when measuring performance over time. As a result, the comparability of certain aspects of the progress reports from period to period is questionable, and users of the progress reports may be hindered in their ability to effectively compare a single school's progress over the years.

**DOE Response:** “The Progress Report is a one-year snapshot that is designed to compare schools based on their performance and progress during that school year. The Department has not made claims of comparability in methodology across years. . . . [T]he Department notes that the standard of comparability to which the Comptroller appears to be holding the Progress Reports – perfect consistency in methodology from year to year – cannot be met in an environment in which basic educational standards change periodically.”

**Auditor Comment:** DOE is incorrect in its contention that we expected to find “perfect consistency in methodology” over time. We recognize that the progress reports are used in a dynamic environment that, at times, necessitates modifications to underlying measures, calculations, and attributes used in promulgating the annual reports. Furthermore, while the progress reports are an annual measure of school performance and student progress, DOE cannot deny the fact that users of the reports will inherently compare outcomes over time to obtain a fuller picture of progress.

Comparability implies the ability for users to be able to compare similar schools as well as to make comparisons of performance over time. Much of all work that goes into measuring and managing performance of any endeavor is based around the underlying characteristic of comparability. Performance methodologies are generally treated the same way from year to year, or period to period, so that users of the information can make more meaningful comparisons of performance over time and reach more

meaningful conclusions. Where changes in policies, methodologies, or measures are made, sufficient disclosures of such changes must be made to explain the impact of any change.

DOE uses progress reports to forecast probable future outcomes. It even compares results over time. For example, schools that receive a letter grade of C in three consecutive years may be targeted for intervention or corrective action. Therefore, to assess actual progress over time, users of information should be able to understand the effect of changes in underlying measures on earlier periods to which they may be compared so that they may interpret the results in a balanced manner.

We cannot overstate the importance of comparability in the matter of high school progress reports. DOE officials, legislators, parents, and society-at-large are affected when a decision is made to close a community school that has been labeled as chronically low performing. Therefore, to ensure that decision makers have the clearest, understandable information, DOE should take every step to ensure that information is clear and understandable to its expected users.

Two key determinants affecting a school's overall score and letter grade for which DOE has made changes include peer groups and grade cut scores. How these changes affect comparability year to year are discussed below.

### *Peer Index, Groups, and Horizons*

DOE has made some changes to the variables used in determining a school's peer group, a key determinant of its overall numeric score and letter grade each year. The agency has not determined what effect, if any, these changes would have in determining peer groups prior to these changes. As a result, the comparability of a school's scores over time may be limited.

DOE defines peer schools as schools that serve similar populations in terms of student proficiency and demographic composition. To determine a school's peer group DOE ranks each high school using a peer index value ranging from 1.0 to 4.5. For the 2008-2009 school year, DOE defined a school's peer index in terms of the average 8<sup>th</sup> grade student proficiency adjusted (reduced) by two times the percentage of a school's special education population and the percentage of its over-age student population. A lower peer index value generally reflects a larger population of high-need students. Using the peer index value, DOE ranks the schools and constructs peer groupings. A particular school's peer group consists of the 20 schools ranked just above it and the 20 schools ranked just below it.

DOE posits that schools are judged primarily in terms of how their students' performance compares to that of students in their peer schools. Accordingly, 75 percent of a school's overall numeric score and those for the areas of environment, performance, and progress are based on the school's raw score compared to the range of peer schools' scores (peer range or horizon) for each of the measured elements for the three prior years. The remaining 25 percent of a school's overall numeric score is based on the school's raw score compared to the range of citywide scores (City horizon), excluding outliers, for each of the measured elements for the three prior years.



For the 2008-2009 progress reports, the peer range included the range of scores earned by peer schools for the three prior school years (2005-2006, 2006-2007, and 2007-2008), excluding outlier scores that deviated markedly from the rest of the scores.

A school's peer group is a key determinant of its overall numeric score and letter grade each year. Therefore, any change in the variables used to determine a school's peer group may affect the composition of that group. For the 2006-2007 progress report, a school's peer group was based on students' average 8<sup>th</sup> grade English Language Arts (ELA) and math proficiency test scores. Since that time, other factors, such as percentage of special education students, self-contained students, and over-age students have been included in the determination. (See Appendix B for the specific changes.) As shown in Table I, for the 10 sampled schools, a review of the schools that were included in their respective peer groups for school year 2007-2008 found that only 34 percent of them were also in their peer groups for the 2009-2010 school year.

**Table I**  
Changes in Peer Group Composition

High School	No. of School in 2007-2008 Peer Group	No. of Schools in 2007-2008 Peer Group Also in 2009-2010 Peer Group	Percentage (%)
Acorn HS	40	16	40%
Baruch HS	40	30	75%
Curtis HS	40	10	25%
DeWitt Clinton HS	40	13	33%
Flushing HS	40	11	28%
Jamaica HS	40	8	20%
Metropolitan Corporate Academy HS	40	4	10%
New World HS	40	4	10%
Norman Thomas HS	40	16	40%
Ralph R. McKee HS	40	22	55%
<b>Total</b>	<b>400</b>	<b>134</b>	<b>34%</b>

DOE has not determined the impact of the changes in the variables used to determine a school's peer group when measuring performance over time. Accordingly, neither we nor DOE could demonstrate the extent these changes had on the composition of any individual school's peer group. As reflected in Table I, when comparing the peer groups for 2007-2008 to 2009-2010, depending on the school, the composition of peer groups of the 10 sampled schools varied significantly. However, the degree to which these variations occurred as a result of changes in the variables used to compute the schools' peer indexes or to changes in other factors (e.g., student populations) is indeterminable.

***Changes of Cut Scores for Progress Report Letter Grades***

While certain aspects of the progress reports are consistent, as shown in Table II, DOE has changed the progress report cut score scales in each of the last four years. The cut scores are

used to determine the letter grades awarded to the schools. By continuously changing the cut score scale, DOE reduces the comparability of progress reports from year to year.

**Table II**

Changes in Progress Report Cut-Score Range  
for School Years 2006-07 through 2009-10<sup>(a)</sup>

Letter Grade	School Year			
	2006-2007	2007-2008	2008-2009	2009-2010
A	67.6 or higher	64.2 or higher	70 or higher	70 or higher
B	48.8-67.5	43.5-64.1	54.0-69.9	58.0-69.9
C	35.1-48.7	34.3-43.4	44.0-53.9	47.0-57.9
D	28.9-35.0	29.7-34.2	36.0 – 43.9	40.0-46.9
F	Below 28.9	Below 29.7	Below 36	Below 40

(a) See Appendix C for the distribution of high school progress report grades.

Officials at some of the 10 sampled schools we visited stated that the annual changes in the cut scores has made it difficult to set target goals for its students. Officials at some of the higher performing schools that we visited complained that the changes resulted in their school receiving a lower grade. Similarly, officials at some of the lower performing schools stated that despite making some improvements, the changing cut scores make it impossible to improve their grade.

DOE officials stated that changes in the cut scores are reflective of schools achieving better outcomes each year. In addition, they stated that since the schools are being held to higher performance standards each year, the bar has been raised to accelerate student progress, especially in lower performing schools. However, DOE officials’ provided no corroborating evidence in support of the cut score changes. Further, DOE has not evaluated the effect of these changes for year-to-year comparisons.

While DOE deemed these changes necessary to reflect dynamic situations and/or to refine the process of measuring school performance, these changes have contributed to a lack of consistency, and therefore comparability of certain aspects of the progress reports overtime. This is of concern especially for poor-performing schools recommended for corrective action. Consequently, users of the progress reports may not be able to effectively compare a single school’s progress over the years.

**Recommendation**

1. DOE should consider a pro forma (“as if”) restatement of school grades to allow for clearer comparison of school performance over time. If not feasible or cost effective, DOE should develop alternative methods to assist users to effectively compare school performance outcomes from period to period balancing the effect of changes in the cut scores.

**DOE Response:** DOE generally agreed, stating “[T]he Department does not consider a pro forma restatement of Progress Report grades to be a feasible option. However, the Department will include guidance on comparing results from year to year in a redesigned Progress Report template or in a supplemental communication.”

### **Effect of Changes in Measures from Year-to-Year Not Sufficiently Demonstrated in Progress Reports**

As to the *fairness in reporting*, we determined that the presentation of data in the progress reports was clear and understandable. However, as was the case with comparability, the reports and supplemental materials did not sufficiently disclose or demonstrate the effect of changes in weights, attributes, and measures that may have impacted year-to-year comparisons of performance outcomes.

GASB Concept Statements No. 2, No. 5, and Suggested Guidelines establish that performance information should be communicated in a readily understandable manner to any reasonably informed, interested party. The information should also include explanations and interpretations about important underlying factors and existing conditions that may have affected performance to help users comprehend the information.

Our review of the progress reports and supplemental information for school years 2006-2007 through 2009-2010 found that the performance information presented therein was generally clear and understandable. However, we noted that some underlying information could be better presented and provide report users with added information upon which to make decisions. Specifically, the progress reports and supplemental materials did not sufficiently disclose or demonstrate the effect of changes in progress report elements that materially affect year-to-year comparisons of performance outcomes. DOE does not include pro-forma disclosures to demonstrate the effect of changes in the components used in determining peer groups or changes in the cut scores.

DOE officials stated that over time they are working to refine the progress reports to create a uniform measure of school performance. They posited that it is not possible to demonstrate the effects of newly implemented changes on prior years’ reports because specific information may not have been collected in the prior years to allow for pro-forma restatement of outcomes.

DOE officials stated that progress report letter grades are the first measure that they look at to assess an individual schools’ progress from year to year. They also stated that while a key factor in identifying lower performing schools, the progress report letter grades are used in tandem with other factors when determining actions to be taken for consistent poor performance. For high schools, these other factors include Quality Review Scores, input from the community and stakeholders, and other factors. Notwithstanding, considering the broad audience of users and the reliance placed upon the progress reports, DOE could only improve the understandability of future reports by including additional information on year-to-year changes.

## **Recommendation**

2. DOE should consider including a pro-forma disclosure in the progress reports and/or supplemental information to demonstrate the effect of significant changes in peer group calculations, changes in cut scores, or other metrics on prior years. If such a restatement is not feasible, DOE should determine a means for users to effectively compare current changes retrospectively to better enable year-to-year comparisons.

**DOE Response:** DOE generally agreed, stating “[T]he Department does not consider a pro forma restatement of Progress Report grades to be a feasible option. However, the Department will include disclosure regarding methodological changes from the prior year and guidance for comparing results from year to year in a redesigned Progress Report template or in a supplemental communication.”

## **Communication with Stakeholders**

According to GASB Suggested Guidelines, to effectively communicate performance information to users, the intended audience (i.e., parents, school administrators, elected officials, etc.) needs to be considered. Involving users and obtaining user feedback may lead to changes in future performance reports that improve their effectiveness, understandability, and importance.

DOE officials asserted that they meet with school principals, network leaders, community representatives, and others to inform and obtain feedback regarding progress report related matters. Further, they stated that stakeholder feedback is considered when deciding on the proposed changes. In support of these assertions, SPU officials stated that the final decision on proposed changes to the 2009-2010 progress reports was based on feedback received from more than 600 principals, teachers, network staff, and parents. For example, DOE officials stated that a factor was added to the peer index calculations for self-inclusion special education populations and some weights were added for the types of diplomas earned by certain groupings of special education students.

DOE officials provided us with a listing of the dates and locations of feedback sessions with high school network leaders and principals for 2010. However, they did not provide sufficient evidence (i.e., meeting minutes or notes) to either corroborate that the feedback received was actually considered, or to substantiate the topics discussed at the feedback sessions, or the medium used to communicate with stakeholders at large. Alternatively, we surveyed 30 randomly selected high school principals or administrators to ascertain this information.<sup>8</sup> Fourteen of the surveyed principals responded.

In summary, the survey respondents indicated that DOE does indeed communicate with stakeholders; however, we could not ascertain the frequency or forum that it uses to communicate. Nevertheless, DOE’s communication with stakeholders appears to be primarily informational or explanatory of proposed progress report changes.

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<sup>8</sup> One of the 30 randomly surveyed principals was from Metropolitan Corporate Academy High School; one of the 10 in our sample of high schools. The principal did not respond to the survey.

According to DOE officials, the progress reports are intended to provide a uniform measure of student progress and school performance. Further, as DOE works to increase standards and student outcomes, it is also working to refine the progress reports over time to establish a balanced and uniform policy.

Since their inception, the school progress reports have been the center of debate and controversy among various stakeholders. While such matters are outside the audit scope, insofar as DOE continues to shape the progress reports to measure school performance, it should move to create greater transparency regarding its communications with interested parties and its decisions to modify the reports from year-to-year.

### **Recommendation**

3. DOE should formally document its efforts to interact with and inform stakeholders regarding ongoing matters affecting school progress reports. Further, it should appropriately document and communicate to stakeholders the basis and justification for progress report changes.

*DOE Response:* “The Department agrees and has already prepared and published materials summarizing and responding to the feedback received from stakeholders during the 2010-11 methodology review process.”

### **Adequate Control Procedures Maintained over the Recording and Processing of Student Data**

We determined that the SPU maintains adequate controls to help ensure that the functions of data extraction, disaggregation, and processing are sufficiently segregated, in accordance with Comptroller’s Directive #1. The processes are primarily automated and are applied uniformly for all schools in the creation of the annual progress reports. Further, the SPU employs certain automated quality assurance procedures to evaluate the progress report outcomes, identify potential anomalies, and investigate them. Overall, the SPU control procedures provide reasonable assurance that the unit’s handling and compiling of progress reports is carried out objectively.

We performed walkthroughs at the 10 sampled schools to identify the controls they had in place to ensure the integrity of the data used in developing the progress reports. The procedures identified and explained to us by school personnel, if functioning as intended, provide adequate controls over the recording and modifying of student grades in HSST/STARS.

While we determined that the control procedures at the 10 sampled schools are reasonable in line with Comptroller’s Directives #1 and #18, due to the individual nature of each school’s management structure and personnel, our audit provides only limited assurance about the effectiveness of those controls. Nonetheless, DOE can place reliance on the noted controls if they are conscientiously and consistently applied throughout the City’s high schools.

### ***Access to ATS and HSST/STARS Adequately Controlled***

With some exceptions, we found that access controls for the ATS and HSST/STARS databases at the 10 sampled schools were adequate.

Comptroller's Directive #18 states: "Access authorization must be carefully designed to insure that employees have access only to files or programs that are necessary for their job function." Further, DoITT's Citywide User Responsibilities Policy prohibits the sharing of individual user accounts and passwords.

DOE's Division of Instructional Information Technology (DIIT) supports both ATS and HSST/STARS. The general controls for these databases, as explained to us by DIIT officials, appear sufficient to ensure that the data are reasonably protected from unauthorized changes or loss. At the school level, principals are responsible for approving users and authorizing their access privileges (i.e., read, write, execute, etc.) to ATS and HSST/STARS. Based on interviews of officials at the sampled schools, we learned that for a user to be granted access, he/she must complete a user-access request form. The principal must approve the form and submit it to the appropriate DOE network office, which will establish the new user account and privileges as authorized by the school principal.

With respect to noted exceptions, we learned that at one of the 10 high schools, an official with the authority to approve changes to student data inappropriately shared his user ID with a subordinate to make such changes to student grades in HSST/STARS. The official stated that since he authorized the changes and HSST/STARS automatically notifies him of any changes, he was not concerned that inappropriate changes would be made.

Regarding ATS, no exceptions came to our attention regarding the inappropriate sharing of user accounts. However, we learned that unlike HSST/STARS, ATS does not have a built-in process to notify the school administration or principal when student records are modified. Therefore, if unauthorized modifications are made to student data in ATS, there is no mechanism to alert senior school officials of such changes. Notwithstanding, DIIT can access a record of all changes made, if required.

### **Recommendations**

DOE should:

4. On an annual or other periodic basis remind school personnel about the prohibition of sharing database user accounts.

***DOE Response:*** "The Department agrees with the recommendation and will provide a periodic reminder to school personnel about the prohibition of sharing database user accounts."

5. Develop uniform procedures for the schools requiring documentation and authorization of changes to student records in ATS.

**DOE Response:** DOE partially agreed, stating: “Although the Department disagrees with the specific recommendation to require principals to be notified, review, and approve all changes to student records in ATS, as most of the fields in ATS have little or no impact on high school Progress Reports and doing so would place an immense administrative burden on principals, the Department will consider whether existing processes and controls around changes to certain key ATS data fields can be strengthened, such as by expanding the data matters highlighted for review on the ATS status screen.”

**Auditor Comment:** DOE’s interpretation of the recommendation is incorrect. Similar to HSST/STARS, as ATS is a computerized database, the documentation and authorization of changes may be done through the system, which would not “place an immense burden on principals” as DOE asserts. Beyond the use of ATS data in the progress reports, DOE shares student data from ATS with the State Department of Education and other stakeholders. Therefore, it is important that DOE have proper procedures and controls in place to mitigate the risk that student data could be inappropriately manipulated or changed without approval.

### **Workbook Data is Generally Reliable**

GASB Concept Statements No. 2, No. 5, and Suggested Guidelines establish that information needs to be derived from systems producing controlled and verifiable data. To be reliable, the information should be verifiable and should faithfully represent what it purports to represent. Based on the results of various tests, we determined that for audit purposes, the data elements appearing in the preliminary and unofficial workbooks prepared by SPU met these conditions. Specifically, the data was verifiable (could be traced to ATS and HSST/STARS) and reconciled with information recorded in ATS, HSST/STARS and reflected in sourced documentation at the schools. However, some exceptions were noted. These matters are discussed below.

#### ***HSST/STARS and Related Workbook Data Generally Reconciles***

Of the 844 Regents exam booklets and related score sheets available at the 10 sampled schools applicable to the 400 sampled students, 820 (97 percent) matched the HSST/STARS data printouts and the data workbooks used by the SPU to generate the school progress reports. The remaining 24 (3 percent) of the 844 tested exams booklets did not match the database. We considered these errors immaterial for the purpose of our assessment.

Notwithstanding, the variations of the errors and the fact that they occurred at six of the 10 sampled schools indicate that DOE needs to ensure that schools take greater care in recording students’ exam scores in HSST/STARS. The pervasiveness and materiality of errors that could occur across the population of DOE high schools may be greater than we found in the audit.

This is of particular concern considering the significance of Regents scores in measuring schools' overall performance. Further, there is a greater risk of data manipulation given the pressures placed on schools to achieve higher levels of performance. Accordingly, DOE must ensure that Regents scores recorded in HSST/STARS are free from bias and errors.

### ***ATS and Related Workbook Data Generally Reconciles***

Although optional, we identified Student Ethnicity Questionnaires as the most reliable source documentation available to compare to ATS from among limited hard copy documentation available to support data reflected in the database. We found that 64 (94 percent) of the 68 ethnicity questionnaires available for 100 of the 400 sampled students matched the ethnicity indicators reflected in ATS. We determined these results sufficient to consider ATS data generally reliable for audit testing purposes.

Further, in assessing the accuracy and completeness of the unofficial workbooks we compared ATS printouts reflecting ethnicity, English language learner (ELL) status, and special education status of the 68 students<sup>9</sup> still in residence at the sampled schools at the time of our audit. We found that 234 (99 percent) of the 236 separate data elements tested in the workbooks matched the data reflected in ATS. These results provided assurance that the data extracted from ATS and used in creating the progress reports was representative of the data recorded in the live database.

### ***Changes from Preliminary to Unofficial Workbooks***

Our evaluation of the preliminary and unofficial workbooks used to generate the 2008-2009 high school progress reports for the 10 sampled schools provided assurance that the metrics and formulas were uniform for all the sampled schools and appeared in both workbooks without variation.

Upon comparing the preliminary workbooks to the unofficial workbooks, we identified 145 changes associated with 83 of the 400 sampled students at the 10 high schools. We evaluated these changes with the progress report modeler for each school. Except for Norman Thomas High School in Manhattan, no material changes were observed in the sampled schools' numeric scores or letter grades for the 2008-2009 progress reports. When assessing all of the changes for Norman Thomas High School, we observed the largest change. Its numeric score increased from 32.5 to 36, resulting in the progress report grade moving from F to D, which might not be viewed as a significant difference.

While not a mandated requirement, SPU officials told us that the schools did not consistently submit the requested screen shots reflecting the changes made for each student. The documentation provides support of the changes made by the schools during the verification

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<sup>9</sup> Thirty-two of the 100 students were discharged (i.e., graduated, transferred or dropped outs) after the 2008-2009 school year. Therefore their files and related data were not available for audit testing at the time of our visits to the sampled schools.



period between the preliminary and unofficial workbooks. It also provides greater transparency and a trail to investigate any questions that may arise later in the process.

***Weaknesses with Retention of Student Records***

Although we determined that there was sufficient documentation to verify and assess the reliability of ATS and HSST/STARS data, as noted earlier there were some instances where student files and/or Regents exam documentation were not available for our review.

DOE Chancellor’s Regulation A-820 and NYSED Record Retention and Disposition Schedule ED-1 establish that schools must retain student records in accordance with established timeframes. Accordingly, schools are required to retain: (1) student’s “permanent” report cards permanently; (2) other student records, such as registration records, screening evaluations, accommodation plans, and related records, for six years after students graduate or should have graduated; and (3) examination (including Regents exams) test results, papers, and answer sheets for one year after the end of the school year.

As reflected in Table III, for the 10 sampled schools there were 907 Regents exams taken by the 400 sampled students during the 2008-2009 school year. Eight of the schools did not have 63 (7 percent) of the 907 requested Regents exam booklets and score sheets available for audit testing.

**Table III**

Availability of 2008-2009 Regents Exams Applicable to 400 Sampled Students

<b>High School</b>	<b>Number of Regents Exams Applicable to 400 Students</b>	<b>Number of Regent Exams Not Available</b>	<b>Percentage</b>
Acorn HS	91	7	8%
Baruch HS	82	22	27%
Curtis HS	100	4	4%
DeWitt Clinton HS	41	0	0%
Flushing HS	138	0	0%
Jamaica HS	73	7	10%
Metropolitan Corporate Academy HS	85	7	8%
New World HS	111	1	1%
Norman Thomas HS	93	1	1%
Ralph McKee HS	93	14	15%
<b>Total</b>	<b>907</b>	<b>63</b>	<b>7%</b>

At the Baruch College High School, we found that the school did not have the 2008-2009 22 Regents test booklets for sampled students. It is possible that this documentation was misplaced during the school’s move to its current location in 2009. No explanation was provided for why the other schools were missing the exam booklets.

Further, the Metropolitan Corporate Academy did not have the cumulative files for 11 sampled students. According to the principal, one file was not available because the student graduated in June 2009. The remaining 10 files were never forwarded by the middle schools

from where the students transferred. In support, the principal provided us with documentation reflecting numerous requests made by Metropolitan to retrieve the missing student files from the middle schools. In addition, on the day of our visit to DeWitt Clinton High School the administrator was unable to locate the cumulative files for three of its students.

Even though these files were not available for us to verify against data in ATS and HSST/STARS for the sampled students, we had sufficient evidence otherwise to assess the completeness and integrity of the systems' data. Notwithstanding, concerns were raised over the schools' lack of compliance with DOE records retention policies.

### **Recommendations**

DOE should:

6. Perform periodic, independent audits of ATS and HSST/STARS data to provide reasonable assurance of its accuracy and reliability.

***DOE Response:*** DOE agreed, stating: "As noted in the Report, the Department has already launched an initiative to perform audits in line with this recommendation. Building on processes and metrics developed in baseline data reviews in previous years, the Department announced in February 2011 that it will begin conducting internal audits of high school data that impact schools' graduation rates, including credits, Regents scores, and discharges. These audits will include a spring/summer review of the previous year's data and an additional review through the high school Progress Report verification period in the fall. The Department's Office of Auditor General will oversee the development and execution of the audit plan, including the school selection process, to ensure fairness and objectivity."

7. Consider requiring that schools submit to the SPU support documentation (i.e., screen shots) for all changes made to student records during the workbook verification period.

***DOE Response:*** DOE agreed, stating: "In line with the Comptroller's recommendation, the Department will also consider the extent to which other procedures, such as the submission of support documentation for every change made during the verification period, will contribute to data reliability, while also weighing the burden of such procedures on school staff, Department staff, and the Department's IT system."

8. Ensure that student records, Regents exam documentation, and other relevant student information are appropriately tracked and retained by the schools as required.

***DOE Response:*** "The Department agrees with the recommendation. The audits described in the response to Recommendation 6, above, will in part assess compliance with relevant records retention and documentation requirements."

9. Ensure that student records, when required, are appropriately transferred from one school to another in a timely fashion.

**DOE Response:** “The Department agrees with the recommendation. The audits described in the response to Recommendation 6, above, will in part assess this requirement, and the Department will periodically remind schools about their obligations in ensuring appropriate and timely transfer of student records.”

10. Remind all principals of the Department’s records retention requirements on a periodic basis.

**DOE Response:** “The Department agrees with the recommendation. Currently, the Department posts the New York State Education Department’s records retention policy on its website, and the Department’s Staten Island Archive Center offers training in those requirements. The Department will be reminding schools of these requirements in conjunction with our audits of high school performance data described in the response to Recommendation 6, above.”

### **Other Issue**

DOE has announced plans to initiate an internal audit of student data from selected high schools to provide greater assurance about the accuracy and verifiability of the data (student grades, credits earned, Regents scores, etc.) reported in ATS and HSST/STARS and reflected in the progress reports. A number of these concerns regarding the accuracy and reliability of student data were raised in a prior audit conducted by our office.

In this audit we noted that each school is responsible for the accuracy and completeness of the student data it records in the ATS and HSST/STARS databases and for retaining related student records. The control procedures disclosed to us by officials during our walkthroughs at the 10 sampled schools, if functioning as intended, provide some assurance that the data are supported. DOE, however, does not have an oversight mechanism in place to help ensure that the school-level controls are consistently applied and functioning properly.

SPU officials stated that they have an informal process to review student data to identify anomalies and questionable trends as part of their quality assurance review and to possibly investigate such anomalies, if deemed appropriate. We were unable to opine on this process because, although requested, DOE did not provide supporting documentation.

Concerns regarding the accuracy and reliability of underlying student data were raised in a previous audit that evaluated DOE’s controls over the calculation of graduation rates (*Audit Report on the Department of Education’s Calculation of High School Graduation Rates*, Audit #ME09-065A, issued July 21, 2009). Some of the key weaknesses or findings regarding the accuracy and reliability of underlying student data disclosed in that audit include the following:

- Transcripts did not sufficiently support that students met graduation requirements.

- Multiple credits were awarded to students for the same major course two or more times.
- Questionable changes were made to student transcripts immediately prior to or just after graduation.
- Inadequate evidence existed to show that all transcript changes were properly approved.
- Some students were discharged (classified as dropouts) without adequate supporting evidence.

Without a strong mechanism to provide assurance about the reliability of student data, there is a greater risk of data manipulation given the pressures placed on schools to achieve higher levels of performance. The effect of inaccurate or false student data can skew the results of school performance outcomes and undermine the credibility of the high school progress reports.

DOE recognizes its vulnerabilities in this area. As iterated in a February 18, 2011, memo to high school principals, beginning in the summer of 2011, DOE's Office of the Auditor General will begin an internal audit of selected high schools' data. The audit, according to DOE, will include a review of credit accumulation, graduation and discharge codes, and Regents scores. An additional review will be conducted during the progress report verification period. Further, documentation reviews are planned to be conducted at the selected schools.

We commend DOE for its initiative and its efforts to enhance credibility to the high school progress reports. Going forward, DOE can strengthen the transparency and credibility of the progress reports by enforcing such audits and sharing the audit findings with the public.

**APPENDIX A**

10 Sampled High Schools and Corresponding Progress Report Results  
for the School Years 2006-2007 through 2009-2010

No.	Sampled High School	Boro	Student Enrollment Used in Preparing 2008-2009 Progress Reports					2006-2007 Progress Report Grade		2007-2008 Progress Report Grade		2008-2009 Progress Report Grade		2009-2010 Progress Report Grade		Recommended for Phase- Out in 2010
			9 <sup>th</sup> Grade (Yr 1)	10 <sup>th</sup> Grade (Yr 2)	11 <sup>th</sup> Grade (Yr 3)	12 <sup>th</sup> Grade (Yr 4)	Total	Score	Letter Grade	Score	Letter Grade	Score	Letter Grade	Score	Letter Grade	
13K499	ACORN Community High School	BKN	230	192	194	124	<b>740</b>	63.3	B	64.4	A	65.4	B	71.7	A	
02M411	Baruch College Campus High School	MAN	108	110	104	97	<b>419</b>	81.2	A	82.6	A	83.6	A	74.5	A	
31R450	Curtis High School	STI	849	846	552	516	<b>2,763</b>	64.2	B	59.4	B	68.8	B	69.8	B	
10X440	DeWitt Clinton High School	BRX	1598	1237	827	726	<b>4,388</b>	47.7	C	42.7	C	49.7	C	48.1	C	
25Q263	Flushing International High School	QNS	90	105	90	108	<b>393</b>	n/a	n/a	73.0	A	70.9	A	64.5	B	
28Q470	Jamaica High School	QNS	465	507	329	204	<b>1,505</b>	44.0	C	37.3	C	41.7	D	45.0	D	Yes
15K530	Metropolitan Corporate Academy High School	BKN	121	149	62	51	<b>383</b>	35.9	C	39.1	C	43.1	D	48.0	C	Yes
11X513	New World High School	BRX	75	82	63	54	<b>274</b>	n/a	n/a	97.0	A	92.1	A	85.6	A	
02M620	Norman Thomas High School	MAN	1,055	664	294	124	<b>2,137</b>	33.4	D	29.7	D	36.0	D	36.0	F	Yes
31R600	Ralph R. McKee Career and Technical Education High School	STI	272	214	136	117	<b>739</b>	63.8	B	67.6	A	79.5	A	76.0	A	
	Total		4,863 (35%)	4,106 (30%)	2,651 (19%)	2,121 (15%)	<b>13,741</b> (100%)									

\*n/a = not applicable because the schools did not receive a letter grade for the specified school year.

Summary of Significant Changes in Progress Report Components/Measures

Progress Report Component/Measure	School Year			
	2006-2007	2007-2008	2008-2009	2009-2010
<b>Peer Index</b>	The 2006 – 2007 peer index based on 8 <sup>th</sup> grade ELA and Math score.	The 2007–2008 peer indexes based on 8th grade ELA and Math score minus (2 X the percentage of Special Education students) minus (1 X the percentage of over-age students).	No Change	The 2009 – 2010 peer index based on 8th grade ELA and Math score minus (2 X the percentage of Special Education students) minus (2 X the percentage of Self-Contained students) minus (1 X the percentage of over-age students).
<b>Peer &amp; City Horizon Weights</b>	The Peer Horizon weight was 67% and the City Horizon weight was 33%	The Peer Horizon weight changed to 75% and the City Horizon weight changed to 25%	No Change	No Change
<b>Progress Report Category Weights</b>	The school environment weight of 15%; student performance weight of 30%; student progress had a weight of 55%.	The school environment had a weight of 15%. The student performance had a weight of 25%. The student progress had a weight of 60%.	No Change	No Change
<b>Weighted Diplomas Rates</b>	Weights were assigned based on the diploma type that was earned. <ul style="list-style-type: none"> <li>• GED = 0.5</li> <li>• Local = 1.0</li> <li>• Regents = 2.0</li> <li>• Advanced Regents = 2.5</li> <li>• Advanced Regents w/ Honors = 3</li> </ul>	Some diplomas were given additional weight on the Progress Report. <ul style="list-style-type: none"> <li>• Local, Regents, Advanced Regents, and Advanced Regents with Honors diplomas with a Career and Technology Education endorsement earned an additional 0.5 weight.</li> <li>• Regents, Advanced Regents, and Advanced Regents with Honors diplomas with an Advanced Designation through the Arts earned an additional 0.5 weight.</li> <li>• Local Regents, Advanced Regents, and Advanced Regents with Honors diplomas with an Associate’s Degree earned an additional 0.5 weight.</li> <li>• Special Education students who qualify for the New York State Alternative Assessment (NYSAA) who earn an IEP diploma are given a weight of 1.0</li> <li>• Special Education students’ diploma weights were doubled when these students earned Local, Regents, Advanced Regents, or Advanced Regents with Honors Diplomas.</li> </ul>	No Change	Special Education students are assigned different designations depending on their level of need, i.e. Special Education Teacher Support Services (SETSS), Collaborative Team Teaching (CTT) and Self-Contained. New diploma weight multipliers were assigned based on the new designations. <ul style="list-style-type: none"> <li>• SETSS students’ diploma weights were doubled.</li> <li>• CTT students’ diploma weights were tripled.</li> <li>• Self-contained students’ diploma weights were quadrupled.</li> </ul>

Summary of Significant Changes in Progress Report Components/Measures

Progress Report Component/Measure	School Year			
	2006-2007	2007-2008	2008-2009	2009-2010
<b>Additional Credit Measures</b>	<p>Additional credit could be earned by schools with high needs students (at least 15 students) who make exemplary gains, i.e. the percent of their high needs students earning 11+ credits. High needs students are categorized as follows:</p> <ul style="list-style-type: none"> <li>• English Language Learners</li> <li>• Special Education students</li> <li>• Hispanic students in the lowest 3<sup>rd</sup> citywide</li> <li>• Black students in the lowest 3<sup>rd</sup> citywide</li> <li>• Other students in the lowest 3<sup>rd</sup> citywide</li> </ul> <p>Schools that score in the top 40% of the additional credit categories earn additional credit.</p>	<p>Three new additional credit measures were added for Regents.</p> <ul style="list-style-type: none"> <li>• Percent of students in the lowest 3<sup>rd</sup> citywide who scored 75+ on the ELA Regents</li> <li>• Percent of students in the lowest 3<sup>rd</sup> citywide who scored 75+ on the Math Regents</li> <li>• Percent of students in the lowest 3<sup>rd</sup> Citywide who graduated with a Regents Diploma</li> </ul> <p>Schools that score in the top 40% of the additional credit categories earn additional credit.</p>	No Change	<p>Additional credit (up to 3 points in each subgroup for a total of 15 points) can be earned by schools with high needs students (at least 15 students) for which the weighted diploma rates for any of the following subgroups (up to 3 points per group) falls within the top 40 % of schools citywide:</p> <ul style="list-style-type: none"> <li>• Special Education students (note: Special Education students receive the differentiated graduation weight, based on their designation, i.e. SETSS, CTT or self-contained)</li> <li>• English Language Learners</li> <li>• Students in the lowest third citywide.</li> <li>• Percentage of students in the Lowest Third citywide who (3 points each): <ul style="list-style-type: none"> <li>• Score 75 or higher on the Math Regents</li> <li>• Score 75 or higher on the ELA Regents.</li> </ul> </li> </ul>
<b>Letter Grade Cut-off Scores</b>	<p>A = 67.6 or higher  B = 48.8–67.5  C = 35.1–48.7  D = 28.9–35.0  F = Less than 28.9</p>	<p>A = 64.2 or higher  B = 43.5–64.1  C = 34.3–43.4  D = 29.7–34.2  F = Less than 29.7</p>	<p>A = 70.0 or higher  B = 54.0–69.9  C = 44.0–53.9  D = 36.0–43.9  F – Less than 36.0</p>	<p>A = 70 or higher  B = 58.0–69.9  C = 47.0–57.9  D = 40.0–46.9  F = Less than 40.0</p>
<b>Weighted Regents Pass Rate for Students without 8<sup>th</sup> Grade Test Scores</b>	<p>Schools with students who did not have an 8<sup>th</sup> grade ELA or math score did not receive credit for those students who passed their Regents with 65 or higher.</p>	No Change	<p>Students without an 8<sup>th</sup> grade ELA or math test score assigned a weight based on their demographic characteristics. For example, Black or Hispanic, Free Lunch, Special Education, ELL and SIFE.</p>	No Change

**APPENDIX C**

Distribution of Progress Report Grades  
for High Schools Awarded Letter Grades  
Schools Years 2006-07 through 2009-10 (a)

Progress Report Letter Grade	2006-07 Progress Reports		2007-08 Progress Reports		2008-09 Progress Reports		2009-10 Progress Reports	
	No. of High Schools Per Grade Category	Pct	No. of High Schools Per Grade Category	Pct	No. of High Schools Per Grade Category	Pct	No. of High Schools Per Grade Category	Pct
A	57	24%	113	40%	139	45%	133	40%
B	97	41%	123	43%	91	29%	97	29%
C	61	26%	34	12%	58	19%	70	21%
D	12	5%	8	3%	21	7%	23	7%
F	9	4%	6	2%	1	<1%	9	3%
<b>Total Schools Awarded Letter Grade</b>	<b>236</b>	<b>100%</b>	<b>284</b>	<b>100%</b>	<b>310</b>	<b>100%</b>	<b>332</b>	<b>100%</b>

(a) The above analysis is based on progress report statistics accessed from the DOE website in January 2011. High schools that are part of Chancellor's District 75 (Special Education) and District 79 (Alternative Schools), along with high schools undergoing closure and new schools without a full four-year complement of students not awarded grades on their annual progress reports are excluded from the analysis.





Office of the Chief Academic Officer  
52 Chambers Street  
New York, NY 10007

+1 212 374 6792 tel

April 18, 2011

H. Tina Kim  
Deputy Comptroller for Audit  
The City of New York Office of the Comptroller  
1 Centre Street, Room 1100  
New York, NY 10007-2341

Dear Ms. Kim:

This letter, along with the enclosed Response to Findings and Recommendations, constitutes the New York City Department of Education's (Department) response to the New York City Office of the Comptroller's (Comptroller) Draft Report MJ10-133A dated March 25, 2011 (Report), on the Department's Controls over high school Progress Reports.

We thank the Comptroller for a Report that presents generally positive findings. Upon completion of a thorough and extensive review of our controls over high school Progress Reports, the Comptroller concluded:

- The Department "maintained adequate controls to ensure that the data reflected in the 2008-2009 high school progress reports were reliable." (Report, p. 1);
- "[T]he data used and attributes measured in the 2008-2009 high school progress reports were timely, relevant, and consistently applied across high schools." (Report, p. 11);
- "[T]he presentation of data in the progress reports was clear and understandable." (Report, p. 14).

Additionally, even as the Report found that the Department maintained adequate controls and sufficient documentation to verify the reliability of data that drives the high school Progress Reports, the Comptroller strongly commended the Department for initiating internal audits of performance data in selected high schools – including reviews of credit accumulation, discharge determinations impacting graduation rates, and Regents scores. One phase of those annual reviews will be conducted during the Progress Report verification period, further strengthening the reliability of the high school Progress Reports.

The concerns raised by the Comptroller in his Report focus primarily on "year-to-year comparability", *i.e.*, modifications that the Department has made from one year to the next – particularly in the formula used to determine the peer schools against which schools are compared, and the cutoffs used to determine schools' final grades.

However, the Department has never made a claim of comparability in methodology across years. In fact, the annual methodology review is a public process: the Department publishes lists of changes and explanations on its website, and staff meet with hundreds of principals and other stakeholders to discuss the changes and understand more fully how they view the Progress Report, how and whether Progress Reports affect instructional practice, and what we can do to make the Progress Report better and more accurate.

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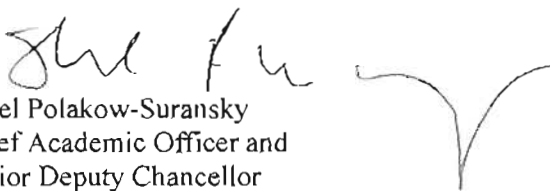
In response to feedback, for example, changes to the peer index formula were made to increase the accuracy and fairness of the measure, particularly with respect to schools with high-need students. Other changes, including the change in cut scores for grades, were made to raise the bar for schools to incentivize continued improvement in performance. The Progress Report is an important performance management tool for the Department, and the methodology changes largely serve the purpose of setting high expectations for our schools to drive better student outcomes.

In short, the Department adjusts the methodology of the Progress Reports periodically to account for changes in school performance, new information, and new ideas about how to measure school quality, all in order to produce the best possible instrument *for the current year*, which is the Progress Reports' role within the Department's accountability system. And, despite these changes in methodology, analysis the Department shared with the Comptroller's Office shows that individual schools' scores have been highly consistent from year to year.

Nevertheless, the Department understands that modifications in scoring methodology can make it difficult to compare a high school's Progress Report grade from one year to the next. That is why the Department publishes a great deal of information about the Progress Reports apart from the overall grade – including the underlying metrics and schools' percentile ranks – that may be used to compare school performance across years. Furthermore, as detailed in the enclosed Response to Findings and Recommendations, we accept the Comptroller's recommendations to provide guidance to further assist users in effectively comparing school performance outcomes from period to period.

In summary, the Department is pleased with the Comptroller's conclusions that the Progress Reports are reliable, relevant evaluations of school quality that are consistently applied to schools in a given year.

Sincerely,

  
Shael Polakow-Suransky  
Chief Academic Officer and  
Senior Deputy Chancellor

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**RESPONSE TO FINDINGS AND RECOMMENDATIONS**

Along with the April 18, 2011 cover letter from Shael Polakow-Suransky to Deputy Comptroller H. Tina Kim, the following detailed response to findings and recommendations constitutes the New York City Department of Education's (Department) response to the New York City Office of the Comptroller's (Comptroller) Draft Report MJ10-133A dated March 25, 2011 (Report) on the Department's Controls over high school Progress Reports.

**Background on the High School Progress Report**

In 2007, principals signed a landmark performance agreement with the City, obtaining increased autonomy to manage their schools in exchange for increased responsibility for the outcomes of their students. With this agreement, the educators who know best what each student needs to succeed were given the authority and resources to make the best decisions for the students in their schools. In return, they agreed to be evaluated on the results they deliver: the academic progress of their students.

The Progress Report is a core element of the accountability system the Department uses to track and measure these results. The other core element of this accountability system is the Quality Review, an evaluation of how well schools are organized to support student learning based on observations by experienced educators. In New York State, schools are also accountable for making Adequate Yearly Progress (AYP) towards proficiency on State exams, as defined by the No Child Left Behind Act.

The Progress Report has two key goals. The first goal is to manage principals' performance – measuring and rewarding the academic progress schools make with all students, especially struggling students. The second goal is to differentiate among schools – giving parents information about which schools are making the most progress with their students, educators information about which schools are making the most progress with particular student populations, and the Department information that can be used to identify schools that persistently struggle and may need to be restructured or replaced.

The Department introduced the Progress Report to schools in the 2006-07 school year through a pilot. Progress Reports were first published for elementary, middle, and high schools in November 2007, and have been published each fall since then. Since that time, the Department has also developed Progress Reports for early childhood schools, District 75 schools, Young Adult Borough Centers, and High Schools for transfer students. Each year, the Department makes adjustments to the Progress Report methodology based on feedback from educators and communities, to improve the accuracy and usefulness of the evaluation and to raise the bar for school performance – ultimately increasing achievement across the City.

*Components of the High School Progress Report*

On the Progress Report, each high school receives a score out of one hundred points and an overall grade from A through F, providing an overall assessment of the school's contribution to student learning in three main areas of measurement: School Environment, Student Performance, and Student Progress.

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Schools also receive separate grades in each of these three categories. Additionally, schools receive recognition for exemplary progress and performance by students most in need of attention and improvement.

School Environment counts for 15 percent of a school's overall score. School Environment measures necessary preconditions for learning, including student attendance, communication, engagement, academic expectations, and safety and respect – based on the results of surveys completed by more than 800,000 parents, teachers, and students annually.

Student Performance counts for 25 percent of a school's overall score. At the high school level, Student Performance measures the percentage of students at a school who have reached the crucial goal of graduation, with emphasis on the number of students graduating with the Regents Diploma that State law now establishes as the goal for all students.<sup>1</sup> In particular, Student Performance measures the four- and six-year diploma rates. Schools that award more diplomas, like Advanced Regents diplomas, that better prepare students for college, earn higher scores through a metric called the "weighted diploma rate."

Student Progress counts for 60 percent of a school's overall score. At the high school level, Student Progress measures the ability of a school to improve the performance levels of students from one year to the next and the incremental gains students make toward the goal of earning a Regents diploma. The Student Progress measure focuses on the gains students make as a result of attending the school, not the abilities they bring with them on the first day. Again, attention is given to all students in each school, with special emphasis given to the one-third of students who entered high school at the lowest performance level. In particular, Student Progress measures the percentage of students earning ten or more credits each year, as well as progress made towards passing the five Regents subject exams required by the New York State Education Department (NYSED) to earn a Regents diploma.

In addition, schools can earn up to 15 additional points on the Progress Report if they are among the top 40 percent of schools in the City helping to close the achievement gap. Specifically, schools that show exemplary progress with groups of students who have historically performed lower than their peers are rewarded for the progress made with these students. At the high school level, schools where high-need students graduate on time (within four years of beginning grade 9) and with higher-level diplomas earn additional credit. Schools where high-need students earn a 75 or higher for the first time on an ELA or Math Regents or graduate with a Regents diploma also earn additional credit. The student groups whose gains can result in additional credit for Exemplary Student Progress are: English language

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<sup>1</sup> NYSED began phasing out the Local diploma, for which a student had to earn a score of 55 or higher on five required Regents exams, in 2007. In 2007-08, graduates had to earn a score of 65 or higher on at least one exam. In 2008-09, students had to earn a score of 65 or higher on at least two exams. In 2009-10, students had to earn a score of 65 or higher on at least three exams. In 2010-11, students will have to earn a score of 65 or higher on at least four exams. And in 2011-12, students will have to earn a score of 65 or higher on all five required Regents exams, the standard for a Regents diploma, in order to graduate.

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learners, students with disabilities, and students in the lowest third citywide in terms of 8<sup>th</sup> grade proficiency in ELA and math.

Across all measures, the Progress Reports use peer groups to contextualize the performance and progress of students facing similar challenges. Schools are evaluated based on how their students' performance compares to that of students in their peer schools (75 percent of the grade) and in high schools citywide (25 percent of the grade). At the high school level, peer schools are determined by creating an index reflecting students' proficiency on their eighth grade State ELA and mathematics exams, and by the percentage of students with disabilities, students in self-contained special education classes, and average students in their population.

By looking not only at each school's overall letter grade, but also its overall numerical score and percentile rank, its component scores and grades for Student Progress, Student Performance, and School Environment, and underlying metrics such as graduation rate and credit accumulation, one can discern variations among schools with the same letter grades and obtain a fuller picture of how New York City's schools are doing.

This information is powerful and used for various purposes: for parents, as they make choices about where to send their kids to school; for educators and school leaders, as they work to identify areas for improvement; and for the Department, as it evaluates which schools are succeeding, which need extra support, and which schools are persistently failing our students.

*How the Progress Report is Used by the Department*

The Progress Reports are a critical lever for managing the performance of principals and other school staff. Prior to the introduction of the Progress Reports, the accountability of school leaders was not well-defined, and included a focus on administrative aspects of running a school. Between 1986 and 2002, the Citywide graduation rate hovered around 50 percent. Since the Department initiated its Children First reforms, the Citywide graduation rate has increased markedly, from 46.5 percent to 62.7 percent between 2005 and 2009 alone, according to NYSED's calculations. By focusing school leaders' accountability on student performance, the Progress Reports have been an important ingredient in promoting these improvements.

The Progress Report grade itself is one tool of performance management, as parents and the broader public pay attention to the grades schools earn. The Department also uses the Progress Report in the Principal Performance Review, which combines Progress Report results, Quality Review results, compliance with Department policies, and meeting performance goals into a rating for each principal. Further, principals and assistant principals may be eligible for monetary bonuses if their school is in the top 20 percent of overall Progress Report score. And Progress Report results help the Department determine when schools are struggling and whether a significant intervention is needed.

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The Department uses a wide range of data and information to identify schools in need of intensive support or intervention.<sup>2</sup> Schools that receive a grade of D, F, or a third consecutive grade of C or lower on the Progress Report and schools that receive a rating below “Proficient” on the Quality Review,<sup>3</sup> as well as schools identified by the New York State Education Department as Persistently Lowest Achieving,<sup>4</sup> are considered for intensive support or intervention.

However, high schools with graduation rates higher than the citywide average, schools earning a Well Developed score on the Quality Review, or schools receiving a Progress Report for the first time will not be considered for formal intervention but will continue to get specialized support from their networks.

For each school identified through this process, the Department reviews other school data, consults with superintendents and other experienced educators who have worked closely with the school, and gathers community feedback to determine the support or intervention that is most appropriate. In some cases, the Department determines that a struggling school is not able to turn around in its current form, and the decision is made to phase out the school by not accepting new students and to open a new school or schools in the building.

*The Progress Report Methodology Review Process*

To develop the first Progress Reports, the Department engaged in an extensive public dialogue with principals, teachers, parents, and community members. It was made clear at the time that the Progress Reports would be an evolving instrument: as the reports were produced and distributed over time, both the Department and stakeholders would identify new and better ways to measure student outcomes and school quality, and the Progress Reports would incorporate that learning and feedback.

The emphasis on engagement and public discussion and the continued efforts to produce better reports continue. Each year, the Department reviews the Progress Report methodology and publishes a set of proposed changes on the Department website. In 2009-10 and 2010-11, the proposed changes were the basis for feedback sessions with principals, parent councils, union leaders, and others. In 2009-10, Department staff met with over 600 stakeholders in small-group feedback sessions. During the 2010-11 review and feedback process, Department staff met with over 1,000 stakeholders.

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<sup>2</sup> The process of identifying struggling schools for intensive support and intervention is managed by an office within the Department’s Division of Portfolio Planning. The Report incorrectly identifies the “Portfolio Planning Unit” as a part of the Division of Performance and Accountability. (Report, p. 9).

<sup>3</sup> The Quality Review results in one of four scores: Underdeveloped, Developing, Proficient, and Well-Developed.

<sup>4</sup> Persistently Lowest Achieving schools are the bottom 5 percent of Title I schools in New York State, based on the State Education Department’s evaluation of English Language Arts and math test scores and graduation rates. Schools identified by the State Education Department as Persistently Lowest Achieving are eligible for federal School Improvement Grant funds to implement federally-defined school improvement measures.

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In making decisions about which methodological changes to propose and, after receiving feedback, which to make final, two priorities are considered.

The first priority is to manage principals' performance—setting ambitious targets for student achievement, giving principals the authority and resources they need to move their students forward, and rewarding principals who meet their targets and therefore, helping to drive the New York City school system forward.

In line with this performance management goal, the Progress Reports have evolved to reflect the higher standards the Department expects schools to meet. Simply graduating students is not sufficient – to meet the demands of the 21<sup>st</sup> Century economy, our high schools must help their students graduate ready for college and the workforce. Accordingly, the Department has adjusted the cut scores required for each grade and made other changes to raise the bar for schools, to keep pace with improving graduation outcomes and keep the pressure on. The Department has also introduced for 2010-11 a set of measures focused on students' college- and career-readiness and college enrollment.

The second priority is to ensure that the Progress Reports are as accurate as possible, and specifically that they appropriately account for student background characteristics. This second priority is the driver behind several changes over the years to the formula used to determine each school's peer group and adjustments used in various metrics. For example, after evaluating results from the early years of the Progress Report and discussing the methodology with numerous stakeholders, the Department began in the 2009-10 reports to differentiate between students with disabilities in different special education placements in the peer index formula as well as in the calculation of the weighted diploma rate.

**The Comptroller's Report**

The Department thanks the Comptroller for a thorough and extensive review of our controls over high school Progress Reports, and the generally positive findings in the Report. Upon completing the review, the Comptroller concluded:

- The Department "maintained adequate controls to ensure that the data reflected in the 2008-2009 high school Progress Reports were reliable." (Report, p. 1);
- "[T]he data used and attributes measured in the 2008-2009 high school Progress Reports were timely, relevant, and consistently applied across high schools." (Report, p. 11);
- "[T]he presentation of data in the Progress Reports was clear and understandable." (Report, p. 14).

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- “The procedures identified and explained to us by school personnel, if functioning as intended, provide adequate controls over the recording and modifying of student grades in HSST/STARS<sup>5</sup>.” (Report, p. 16)

Further, the Comptroller strongly commended the Department for initiating internal audits of performance data in selected high schools, including reviews of credit accumulation, discharge determinations impacting graduation rates, and Regents scores. One phase of those annual reviews will be conducted during the Progress Report verification period, further strengthening the reliability of the high school Progress Reports.

*Year-to-Year Comparability*

As described above, the Department undergoes an extensive and public review of the Progress Report methodology each year. The dual goals of the changes made to the methodology are to raise expectations for schools to promote continuous improvement and to enhance the accuracy of the reports. In order to promote both goals, Department staff meet with hundreds of principals and other stakeholders each year, to understand better how they view the elements of the Progress Report, how the Progress Reports affect instructional practice, and to hear new ideas for making the next iteration of the Progress Report better and more accurate.

The primary concern raised by the Comptroller in the Report centers on these periodic modifications to the Progress Report methodology, focusing specifically on changes in the peer index formula used to determine peer schools and changes in the cut scores used to determine letter grades. As a result of these changes, the Comptroller found that the “comparability of certain aspects of the Progress Reports from period to period is questionable, and users of the Progress Reports may be hindered in their ability to effectively compare a single school’s progress over the years.” (Report, p. 11).

The Progress Report is a one-year snapshot that is designed to compare schools based on their performance and progress during that school year. The Department has not made claims of comparability in methodology across years – in fact, the annual methodology review is a public process. The Department publishes lists of changes and explanations on its website, and facilitates numerous meetings with principals and other stakeholders to discuss the changes.

The Comptroller found no flaws in the Progress Report as a single-year evaluation. The Report concludes that the “data used and attributes measured in the 2008-2009 high school reports were consistently applied among high schools, which allowed for comparisons between schools in a given year.” (Report, p. 10).

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<sup>5</sup> The Student Transcript and Academic Recording System (STARS) is an updated version of the Department’s High School Scheduling and Transcript (HSST) system, and many Department personnel still use the HSST and STARS acronyms interchangeably.



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The year-to-year changes in cut scores for final grades primarily serve a performance management function. These changes, among others, help to ensure that the expectations for schools are kept high, so there is always an incentive to improve student outcomes. The changes in cut scores also help to differentiate among schools—giving parents information they can use as they make decisions about where to send their children; giving educators information they can use to identify schools that are more effectively serving similar populations; and giving the Department information it can use to determine which schools are succeeding and which need improving.

The changes over time to the peer index formula are mainly in support of improving accuracy. Based on analysis of prior results and feedback from principals and other stakeholders, the Department has incorporated additional student demographic characteristics in the peer index formula to more precisely determine the role of schools on their students' achievement. The changes in peer index formula also serve a performance management function, in that they further focus the public and the Department on the quality and impact of a school, rather than the incoming ability of its students.

Notwithstanding the changes in methodology the Department has made over time, high school Progress Report scores have been remarkably stable. Analysis the Department shared with the Comptroller shows that the correlation between an individual high school's Progress Report score from one year to the next is extremely high. Thus, while the Department has, over time, made the Progress Report a more accurate, precise, and fair evaluation, and at the same time has raised the bar for high schools, schools have still performed consistently on the evaluations over time.

In evaluating year-to-year comparability, it is also important to consider the way that the Department uses the Progress Reports: the current year grade is most relevant to the public perception of the school; only current year results factor into the Principal Performance Review; and current year performance is the basis for the principal and assistant principal monetary bonus. And, while the Department considers up to three years of Progress Report grades in the initial identification of schools for significant intervention, the current year grade may be no higher than a C to be considered, and a school will be removed from consideration if it is performing well along other dimensions of school quality.

Finally, the Department notes that the standard of comparability to which the Comptroller appears to be holding the Progress Reports – perfect consistency in methodology from year to year – cannot be met in an environment in which basic educational standards change periodically. For example, as noted above, New York State began phasing out the Local diploma – requiring a score of 55 or higher on five Regents exams – in 2007. In each year since then, students had to earn a score of 65 or higher on an increasing number of exams in order to graduate. By 2012, students will have to earn a 65 or higher on all five required exams, the standard for a Regents diploma, in order to graduate. The Department supports this change, which raises the expectations for our students and advances the goal of graduating more students with the skills they need to succeed in college and the workforce. But the State-determined evolution of graduation standards means that any evaluation, such as the Progress Report, that incorporates graduation rates will not be perfectly consistent in methodology over time.

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In short, the Department adjusts the methodology of the Progress Reports periodically to account for changes in school performance, new information, and new ideas about how to measure school quality, all in order to produce the best possible instrument *for the current year*, which is the Progress Reports' role within the Department's accountability system.

*Communication and Outreach*

Each year, the Department produces a detailed explanation of the methodology used in the Progress Report including a thorough explanation of any changes in methodology. In 2009-10 and 2010-11, the Department engaged in a process of proposing changes to the methodology, seeking input from hundreds of principals and other stakeholders in small group feedback sessions, and then finalizing the methodology. In each year, both the proposed changes and the final methodology (including indications of how the original proposals changed as a result of feedback) were published on the Department's website and distributed to principals.

Further, all Progress Report metrics and scores from all years are posted on the Department's website, and principals receive all of their school's student-level data and school-level calculations before the Progress Reports are produced each year. In short, the Department undertakes significant effort to inform schools and the public about Progress Report methodology, changes in methodology, calculations, and school results.

Although the Comptroller found that the presentation of data in the Progress Reports was "clear and understandable," the Report cited the Department for providing insufficient explanation of year-to-year changes in methodology.

Despite the substantial disclosure of information that the Department provides to schools each year, the Comptroller recommends that the Department go beyond such information and recalculate prior year Progress Reports using the current methodology. The benefits of recalculating prior year results would be limited – the current year results are most useful to the Department, schools, and the public, because they reflect the most recent performance of the schools. Further, recalculating results would cause significant disruption, as every decision made by considering a "final" Progress Report result would be subject to post hoc questioning. For example, eligibility for bonuses already paid out based on single-year results could be called into question based on small changes in rank-ordering due to recalculation.

The Department is, however, undertaking other means to communicate comparisons across years. First, as noted, the Department publishes a great deal of information about the Progress Reports, other than the overall grade, including the underlying metrics, and schools' percentile rank, that can be used to compare school performance across years. Second, to address some of the Comptroller's concerns, the Department will include a disclosure regarding methodological changes from the prior year and guidance for comparing results from year to year in a redesigned Progress Report template or supplemental communication.

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The Comptroller also found that the Department's documentation of engagement with principals and other stakeholders was insufficient. The Department provided the Comptroller's Office with a list of meeting dates and the names of principals who attended each meeting during the 2009-10 review process, showing that Department staff met with over 600 principals during more than 50 meetings. The Department publishes on its website a document listing the final changes in methodology, noting the amendments to the proposed changes following feedback sessions. The "final changes" document for the 2009-10 high school Progress Report is included as Exhibit A.

For 2010-11, the Department has also created a document summarizing the major points of feedback received during the review process and responding to it. This "response to feedback" document is included as Exhibit B.

*Controls on Source System Data*

Most of the key metrics that influence a high school's Progress Report score are contained within the Department's Scheduling, Transcripts, and Academic Reporting System (STARS), which is used in all high schools to track courses taken, grades received, credits awarded, and Regents exams taken and scored. The Comptroller found that "[t]he procedures identified and explained to us by school personnel, if functioning as intended, provide adequate controls over the recording and modifying of student grades in HSST/STARS." (Report, p. 16). Among other things, STARS automatically notifies the school administration or principal when student records are modified.

Automate the Schools (ATS) is a school-based administrative system which standardizes and automates the collection and reporting of data for all students in the New York City Public Schools. It provides for automated entry and reporting of citywide student biographical data; on-line admissions, discharges, and transfers; attendance; grade promotion; pupil transportation and exam processing; and many other functions. The vast majority of the data in the ATS system have no measurable impact on the high school Progress Report. Unlike STARS, ATS does not provide the principal a notification when student records are modified.

The Comptroller recommends that the Department "[d]evelop uniform procedures for the schools requiring documentation and authorization of changes to student records in ATS." (Report, p. 17).

There are controls around data in ATS not noted in the Report. ATS automatically directs users to a Status screen when they sign on, which notifies the school of data elements and transactions that may require the school's closer attention, including data around school transfers. Key student disposition codes around graduation, discharges, transfers and dropouts, are subject to processes for review, authorization, documentation and certification. Moreover, student registers and meal code determinations in ATS are already subject to annual internal audits by the Department's Office of Auditor General, and as noted above, going forward student discharge determinations in ATS will be subject to internal audit as well.

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With regard to the specific requirement that principals be notified of, review, and authorize every change to student records in ATS, the Department believes that this would create a huge administrative burden, diverting busy principals' attention from their more vital day-to-day responsibilities, without any measurable impact on the reliability of high school Progress Report data.

That said, the Department will consider whether existing processes and controls around changes to certain key ATS data fields can be strengthened, such as by expanding the data matters included on the ATS status screen.

**Comptroller's Recommendations and Department Responses**

Comptroller's Recommendation:

1. DOE should consider a pro forma ("as if") restatement of school grades to allow for clearer comparison of school performance over time. If not feasible or cost effective, Department should develop alternative methods to assist users to effectively compare school performance outcomes from period to period balancing the effect of changes in the cut scores.

Response to Recommendation:

For the reasons explained above, the Department does not consider a pro forma restatement of Progress Report grades to be a feasible option. However, the Department will include guidance on comparing results from year to year in a redesigned Progress Report template or in a supplemental communication.

Comptroller's Recommendation:

2. DOE should consider including a pro-forma disclosure in the Progress Reports and/or supplemental information to demonstrate the effect of significant changes in peer group calculations, changes in cut scores, or other metrics on prior years. If such a restatement is not feasible, Department should determine a means for users to effectively compare current changes retrospectively to better enable year-to-year comparisons.

Response to Recommendation:

For the reasons explained above, the Department does not consider a pro forma restatement of Progress Report grades to be a feasible option. However, the Department will include disclosure regarding methodological changes from the prior year and guidance for comparing results from year to year in a redesigned Progress Report template or in a supplemental communication.

Comptroller's Recommendation:

3. DOE should formally document its efforts to interact with and inform stakeholders regarding ongoing matters affecting school Progress Reports. Further, it should appropriately document and communicate to stakeholders the basis and justification for Progress Report changes.

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Response to Recommendation:

The Department agrees and has already prepared and published materials summarizing and responding to the feedback received from stakeholders during the 2010-11 methodology review process.

Comptroller's Recommendation:

4. On an annual or periodic basis remind school personnel about the prohibition of sharing database user accounts.

Response to Recommendation:

The Department agrees with the recommendation and will provide a periodic reminder to school personnel about the prohibition of sharing database user accounts.

Comptroller's Recommendation:

5. Develop uniform procedures for the schools requiring documentation and authorization of changes to student records in ATS.

Response to Recommendation:

Although the Department disagrees with the specific recommendation to require principals to be notified, review, and approve all changes to student records in ATS, as most of the fields in ATS have little or no impact on high school Progress Reports and doing so would place an immense administrative burden on principals, the Department will consider whether existing processes and controls around changes to certain key ATS data fields can be strengthened, such as by expanding the data matters highlighted for review on the ATS status screen.

Comptroller's Recommendation:

6. Perform periodic, independent audits of ATS and HSST/STARS data to provide reasonable assurance of its accuracy and reliability.

Response to Recommendation:

As noted in the Report, the Department has already launched an initiative to perform audits in line with this recommendation. Building on processes and metrics developed in baseline data reviews in previous years, the Department announced in February 2011 that it will begin conducting internal audits of high school data that impact schools' graduation rates, including credits, Regents scores, and discharges. These audits will include a spring/summer review of the previous year's data and an additional review through the high school Progress Report verification period in the fall. The Department's Office of Auditor General will oversee the development and execution of the audit plan, including the school selection process, to ensure fairness and objectivity.

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Comptroller's Recommendation:

7. Consider requiring that schools submit to the SPU support documentation (i.e., screen shots) for all changes made to student records during the workbook verification period.

Response to Recommendation:

The Department believes that the existing requirements regarding document retention to support changes in STARS and ATS, coupled with the new internal audit procedure noted in the Report, which includes a review focused on changes made during the Progress Report verification period in the fall, will help to ensure that the changes made during the verification period are legitimate and supported by evidence. In line with the Comptroller's recommendation, the Department will also consider the extent to which other procedures, such as the submission of support documentation for every change made during the verification period, will contribute to data reliability, while also weighing the burden of such procedures on school staff, Department staff, and the Department's IT system.

Comptroller's Recommendation:

8. Ensure that student records, Regents exam documentation, and other relevant student information are appropriately tracked and retained by the schools as required.

Response to Recommendation:

The Department agrees with the recommendation. The audits described in the response to Recommendation 6, above, will in part assess compliance with relevant records retention and documentation requirements.

Comptroller's Recommendation:

9. Ensure that student records, when required, are appropriately transferred from one school to another in a timely fashion.

Response to Recommendation:

The Department agrees with the recommendation. The audits described in the response to Recommendation 6, above, will in part assess this requirement, and the Department will periodically remind schools about their obligations in ensuring appropriate and timely transfer of student records.

Comptroller's Recommendation:

10. Remind all principals of the DOE's records retention requirements on a periodic basis.

Response to Recommendation:

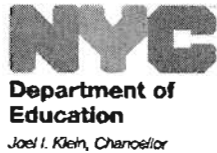
The Department agrees with the recommendation. Currently, the Department posts the New York State Education Department's records retention policy on its website, and the Department's Staten Island

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Archive Center offers training in those requirements. The Department will be reminding schools of these requirements in conjunction with our audits of high school performance data described in the response to Recommendation 6, above.

**Closing Remarks**

In closing, the Department would like to once again thank the Comptroller for a thorough report with positive findings regarding the reliability, consistency, and clarity of the high school Progress Reports. The Department is also pleased with the Comptroller's commendation of its initiation of an internal audit procedure covering the data used in the Progress Reports. With this new audit procedure and additional efforts in line with the Comptroller's recommendations, the Department is confident that the Progress Reports will continue to reflect accurate data on school performance, and will continue to serve their important function in New York City's accountability system.



**Final Changes to High School Progress Reports**  
*Last Updated: April 6, 2010*

This document describes final changes for the 2009-10 Progress Reports, and includes answers to frequently asked questions about the changes. If you have additional questions about the changes, please email [PR\\_Support@schools.nyc.gov](mailto:PR_Support@schools.nyc.gov). **Bold text reflects a revised policy change, since the initial proposal from January, based on feedback from more than 600 principals and network staff, parents, and union leaders.**

## Final Changes

Progress Report Component	2008-09 Measure	Change for 2009-10	Reasons for Change
1. Graduation weights for Special Education Students in the Weighted Diploma Rate measures	All students with IEPs receive double the graduation weight for graduating with a Local Diploma or higher.	The graduation weights will be as follow for the following Special Education students: <ul style="list-style-type: none"> <li>SE/TSS – double</li> <li>CTT – triple</li> <li><b>Self-Contained – quadruple</b></li> </ul>	Graduation rates for Self-Contained and CTT students are very low. Increasing the weight for Self-Contained and CTT students will reward schools that demonstrate the kind of progress necessary to help these students graduate.
2. Additional credit	Percentage of students who earn 11+ credits among the following sub-groups (2 points each): <ul style="list-style-type: none"> <li>Special Education Students</li> <li>English Language Learners</li> <li>Hispanic Students in the Lowest Third Citywide</li> <li>Black Students in the Lowest Third Citywide</li> <li>Other Students in the Lowest Third Citywide.</li> </ul> Percentage of students in the Lowest Third Citywide who (2 points each): <ul style="list-style-type: none"> <li>Score 75 or higher on the Math Regents</li> <li>Score 75 or higher on the ELA Regents</li> <li>Graduate with a Regents Diploma.</li> </ul>	<b>The weighted diploma rate for the following sub-groups (3 points each):</b> <ul style="list-style-type: none"> <li><b>Special Education Students (note: Special Education students will receive the differentiated graduation weight, based on their program recommendation, described in change #1 above)</b></li> <li>English Language Learners</li> <li>Students in the lowest third Citywide.</li> </ul> Percentage of students in the Lowest Third Citywide who (3 points each): <ul style="list-style-type: none"> <li>Score 75 or higher on the Math Regents</li> <li>Score 75 or higher on the ELA Regents.</li> </ul>	The primary focus of the additional credit measures is now on graduation, specifically for groups of students that have historically graduated at lower rates than the City overall. Improving the graduation outcomes for Special Education students, English Language Learners, and students in the lowest third Citywide is critical to improving life outcomes for these students. Schools that are successful in helping these students graduate will receive additional credit on the high school Progress Report.
3. Credit measures in Student Progress section	Includes all students in years 1, 2, and 3 of high school.	Exclude New York State Alternate Assessment students from the credit measures (note: these students will also be removed from the Average Completion Rate for Remaining Regents metric).	Alternate Assessment students are typically on a non-credit-bearing schedule.
4. High school peer index	The high school peer index is an average of the 8 <sup>th</sup> grade	<b>The formula for calculating the high school peer index</b>	The percentage of Self-Contained students helps to



Progress Report Component	2008-09 Measure	Change for 2009-10	Reasons for Change
	proficiency in ELA and Math for all students on the school's register minus two times the percentage of Special Education students minus the percentage of over-age (on entry) students.	will now include an adjustment for Self-Contained students (beyond the existing adjustment for Special Education students). Specifically, a high school's peer index will equal: average 8 <sup>th</sup> grade proficiency minus two times the percentage of Special Education students minus two times the percentage of Self-Contained students minus the percentage of over-age (on entry) students.	further establish the level of challenge faced by each high school and therefore should be reflected in the peer index.
5. Peer groups	Peer groups for each school were the same in 2007-08 and 2008-09.	Update the peer index for each school based on student proficiency/demographics in 2009-10 and update peer groups.	Ensure an up-to-date peer comparison on the Progress Report.
6. Peer and City horizons	Peer and City horizons for each school were the same in 2007-08 and 2008-09.	Update peer and City horizons based on historical school performance results from 2006-07, 2007-08, and 2008-09.	As students continue to show more progress each year, it is important that the Progress Report benchmarks (i.e., horizons) reflect all of the historical student achievement information that is available.
7. Progress Report Grades and Cut Scores	For 2008-09, the high school cut scores were: <ul style="list-style-type: none"> <li>▪ A – 70</li> <li>▪ B – 54</li> <li>▪ C – 44</li> <li>▪ D – 36.</li> </ul>	For 2009-10, the high school cut scores will be: <ul style="list-style-type: none"> <li>▪ A – 70</li> <li>▪ B – 58</li> <li>▪ C – 47</li> <li>▪ D – 40.</li> </ul>	Schools continue to achieve better outcomes each year, and it is important to raise the cut scores to account for this growth.  For schools who have achieved lower Progress Report grades in the past, it is important to accelerate the growth of their students so that they can attain the desired level of success in high school.

\* There are no changes planned for the School Environment section of the Progress Report.

## Frequently Asked Questions

### 1. Why are the cut scores for each letter grade increasing again this year?

The cut score for schools to receive an A will remain at 70 (the same score required to receive an A in 2008-09). Cut scores to get a B, C, or D have increased for two reasons:

- Schools continue to achieve better outcomes each year, and it is important to raise the cut scores to account for this growth

- For schools who have achieved lower Progress Report grades in the past, it is important to accelerate the growth of their students so that they can attain the desired level of success in high school

**2. Will I have a new peer group this year?**

Yes. Peer groups will be updated to reflect the most recent demographics of the school.

Each high school's peer index will be updated using the following weighted average formula (a slight modification from 2007-08).

Peer Index =

- Average 8th grade ELA and Math proficiency –
- 2 \* % of Special Education students –
- 2 \* % of Self-Contained students –
- % of over-age (on entry) students

Schools will once again be grouped with the 40 schools with the closest peer index (the 20 schools with a peer index right above it and the 20 schools with a peer index right below it).

**3. Are the point values for each category changing?**

No. The point values for each category will remain the same.

- School Environment (15 points)
- Student Performance (25 points)
- Student Progress (60 points)

**4. When will a student's Special Education program recommendation be determined? What happens if a student's program recommendation changes throughout the year?**

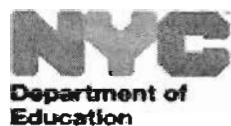
Each student's program status will be based on his/her Special Education classification as of the end of the school year.

**5. Will I receive a Progress Report Modeler as I have in the past?**

Each school will receive a preliminary Progress Report Modeler that includes updated peer and city horizons and reflects all of the finalized changes to the metrics.

**6. How can I receive additional support in understanding these changes?**

Please contact your network leader, SATIF, or email [PR\\_Support@schools.nyc.gov](mailto:PR_Support@schools.nyc.gov) with any questions. If you would like to request a training presentation for your network, please email Phil Vaccaro at [pvaccaro2@schools.nyc.gov](mailto:pvaccaro2@schools.nyc.gov).



**Responses to Feedback on Progress Report Methodology**  
*Last Updated: April 12<sup>th</sup>, 2011*

In the month of March, representatives of the Division of Academics, Performance, and Support facilitated over 50 feedback sessions with a total of approximately 1,000 participants, including principals, network staff and school staff. Participants provided a broad range of feedback, which we have summarized in this document, along with our responses.

Feedback from participants has informed the final changes to the 2010-11 Progress Report methodology, and will inform changes to the Progress Report methodology in future years.

We thank all those who provided feedback for helping to improve these evaluation tools and welcome additional feedback. To share comments or ask any questions throughout the year, please write to [PR\\_Support@schools.nyc.gov](mailto:PR_Support@schools.nyc.gov).

**Feedback on Proposed Changes to Scored Portion of the 2010-11 Progress Report**

Topic	Feedback	Response
<p><b>Percent of students earning 10 or more credits (HS)</b></p>	<ul style="list-style-type: none"> <li>The proposed requirement of 2 credits in each of 3 of the 4 main subjects is inconsistent with some schools' course programming.</li> <li>A student who earns fewer than 2 credits in all 4 subjects should not be treated differently than a student who earned credit in only 3 subjects.</li> </ul>	<p><b>2010-11 Update.</b> Taking full year courses in English, math, science, and social studies in each of the first three years of high school is the most common path for a student to stay on track to graduate in four years. Schools have alternative course programming, however, and to accommodate that diversity, the credit by subject rule will be adjusted to be more flexible.</p> <p>For 2010-11, the new rule will change so that each student must earn six credits total in the four main subjects, with three subjects represented.</p>
<p><b>Attribution of students for Regents and credit metrics (HS / HST / YABC)</b></p>	<p>Students who graduate in the middle of the year should be counted toward metrics in the progress section even if they are discharged before June 30.</p>	<p><b>2010-11 Update.</b> Schools should get credit for their mid-year graduates' Regents and credit outcomes during the time they are enrolled.</p> <p>The new student attribution rule does not exclude mid-year graduates from the high school, transfer school, or YABC progress metrics.</p>

Topic	Feedback	Response
Former special education status and former English language learners (HS / HST / YABC)	Many students' ELL status or special education placement changes at the end of their 8th grade year. By focusing on only four years of status, our proposal would not capture the 8th grade change for students in their fourth year of high school.	<b>2010-11 Update.</b> The new rule will consider the past five years of ELL and special education status for high school students.
Additional credit for movement of students with disabilities to less restrictive environments (EMS / EC / HS / HST / YABC)	Students receiving special education services for the first time should not be included in the denominator of the less restrictive environment additional credit measure.	<b>2010-11 Update.</b> The denominator should exclude students who cannot contribute to the numerator.  Students who received special education services (other than related services only) for the first time in 2010-11 will be excluded from the metric.
Additional credit for movement of students with disabilities to less restrictive environments (EMS / EC / HS / HST / YABC)	The less restrictive environment additional credit metric rewards a change in service provision even if the change does not result in better academic outcomes.	<b>No action planned at this time.</b> It is important to consider the less restrictive environment metric in the context of the full Progress Report. Schools are responsible for the performance and progress of all students, and existing metrics that focus specifically on the performance and progress of students with disabilities.  Overall, a school can earn the most points on the Progress Report by placing students with disabilities in the least restrictive environment that is educationally appropriate – in other words, the setting in which the student will make the most academic progress.

Topic	Feedback	Response
Additional credit for movement of students with disabilities to less restrictive environments (EMS / EC / HS / HST / YABC)	A school should get credit for decertifying a student who begins the new placement at another school in a future year.	No action planned at this time. One of the important corollaries to the less restrictive environment metric is that schools are also accountable for the academic progress of the students whose placement is changed. A school that moves a student to a new placement that does not take effect until the student enrolls in a new school does not have that accountability for academic progress.

Feedback on Proposed Phase-In Metrics

Topic	Feedback	Response
All phase-in metrics (MS / K-8 / HS / HST / YABC)	<ul style="list-style-type: none"> <li>• Phase-in metrics should not be reported in the first year because principals did not learn about them until February.</li> <li>• Phase-in metrics should be scored immediately because of the urgency of implementing higher standards.</li> </ul>	<p>No action planned at this time. We believe the new two-year phase-in approach is the best compromise between the urgency of measuring these outcomes and the need to give schools time to adjust to new accountability metrics.</p> <p>The phase-in metrics will be publicly reported for 2010-11 but will not be integrated into the Progress Report grade. The metrics will be integrated into the Progress Report grade for the 2011-12 reports.</p>

Topic	Feedback	Response
<p>Middle school core course pass rate (MS / K-8)</p>	<p>Grading standards differ from school to school and from classroom to classroom. Including these metrics in the Progress Report may lead to “grade inflation.”</p>	<p><b>Action planned for Spring 2011.</b></p> <p>Measuring diverse course offerings and pedagogy is one of the main benefits of the middle school course metrics, which will reward schools for innovative practices and a variety of learning outcomes. However, lack of standardization is also one of the challenges of the new metrics.</p> <p>With input from principals and other stakeholders, the DOE will provide guidance on middle school grading, similar to the policy recently announced for high school credits. The DOE will support schools in understanding and integrating this guidance, ensuring that these data are comparable across schools before using them for school evaluation. Also, to ensure that integrating these data into school accountability does not lead to inappropriate grading practices, the DOE will explore ways to increase oversight of middle school grading – for example, through an academic data audit for middle schools.</p>
<p>College Readiness Metrics (HS / HST / YABC)</p>	<p>Metrics should reward successes in achieving career readiness for our students.</p>	<p><b>Under consideration for 2011-12.</b> We share this goal, and we are exploring the availability of data and possible career-readiness measures for the Progress Report for future years.</p>

Topic	Feedback	Response
College enrollment rate (HS / HST / YABC)	There are reasons why students choose not to enroll in college that are out of schools' control.	<b>No action planned at this time.</b> We acknowledge that there are reasons beyond a school's control that certain students do not enroll in college, but there are also actions that schools can take to increase the likelihood that students enroll. One of the goals of this metric is to recognize schools that are taking those steps and achieving higher college enrollment rates than other schools serving similar students.

### Feedback Regarding Other Aspects of the Progress Report

Topic	Feedback	Response
Peer groups and metric adjustments (All school types)	To further the goal of demographic neutrality, the Progress Report should include additional factors in the peer index or for metric adjustments, including: <ul style="list-style-type: none"> <li>• Special education placement</li> <li>• SIFE / long-term ELL status</li> <li>• School admission criteria</li> <li>• Age/credits of students who transfer into the school</li> <li>• Temporary housing status</li> </ul>	<p><b>Under consideration for 2011-12.</b> We will re-evaluate the peer index formula and metric adjustments for the 2011-12 Progress Report, and will consider all of the demographic characteristics suggested. Adjusting the peer index formula requires substantial analysis to determine the impact of the changes, and therefore cannot be done for 2010-11.</p> <p>It is worth noting that some of the suggested characteristics (such as special education placement) are already incorporated in other elements of the Progress Report. Further, many of these characteristics are highly correlated with other criteria used in the peer index (such as incoming proficiency). As a result, it is not necessary to include every characteristic related to student outcomes in the peer index.</p>

NYC DEPARTMENT OF EDUCATION  
Responses to Feedback on the Progress Report

Topic	Feedback	Response
<p>Focus on State ELA and Math exams (EMS / EC / D75)</p>	<p>State Math and ELA exams play too large a role in the Progress Reports covering grades K-8, and have a negative effect on the reports' stability as well as instructional practice.</p>	<p><b>Under consideration for 2011-12.</b> We are actively seeking to diversify the Progress Report beyond State tests.</p> <p>For this reason, at the middle school level, we are phasing in metrics based on student outcomes in core and accelerated courses.</p> <p>With elementary and middle school principals and other stakeholders, we are also exploring the use of additional elementary and middle school courses and assessments other than State exams in the Progress Report.</p>
<p>School Survey (All school types)</p>	<ul style="list-style-type: none"> <li>• Survey questions focused on the principal unfairly linked Progress Report outcomes to their personal popularity.</li> <li>• A small number of frustrated constituents can affect Progress Report results by offering negative responses.</li> </ul>	<p><b>No action planned at this time.</b> Parent, teacher, and student opinions of the school environment, including school leadership, are important. Individual responses are aggregated across respondent groups so that no individual response will have too large an effect on the final score.</p>
<p>NYSESLAT progress (All school types)</p>	<p>The Progress Report should recognize schools for helping their ELL students progress toward language proficiency on the NYSESLAT exam.</p>	<p><b>Under consideration for 2011-12.</b> One of the new rules, the inclusion of former ELL students in the additional credit calculations, will recognize schools' progress with ELL students.</p> <p>For the 2011-12 Progress Report, we will also consider an additional credit metric based on year-to-year progress on the NYSESLAT. Additional analysis is required to determine appropriate specifications for such a metric.</p>



Topic	Feedback	Response
<p><b>Data tools / Modelers (All school types)</b></p>	<p>Educators have expressed a desire for additional tools to use in planning such as:</p> <ul style="list-style-type: none"> <li>• A list of students in the lowest third groups for the current school year</li> <li>• A list of the top 33% of schools (in terms of ELA/Math performance or 4 year graduation rate) for the previous year</li> <li>• Guidance in how to use the Progress Report to set goals</li> <li>• A tracker for transfer school / YABC graduation cohorts</li> </ul> <p>Some have expressed concern that discontinuing the modelers removes a useful goal-setting tool.</p>	<p><b>Under consideration for 2011-12.</b></p> <p>Providing useful data tools for schools is an important priority. We discontinued the modeler because it was not fulfilling the objectives we had for it. It was released too late in the year for use in goal-setting for the school year. Also, because it used preliminary data, it was not an accurate predictor of final Progress Report outcome. We are working on developing better tools, but we do not have anything concrete to announce at this time.</p>
<p><b>Minimum number of students for additional credit metrics (All school types)</b></p>	<p>For small schools, the minimum number of students for additional credit metrics can be too high. For other schools, it can be too low because 10 or 15 is not enough for a reliable sample or because schools may qualify for additional credit without having a large number of students that fit the criteria.</p>	<p><b>Under consideration for 2011-12.</b> We will explore possible adjustments to the minimum student requirements for additional credit metrics for the 2011-12 Progress Report. Additional analysis will be required to determine the impact of such a change.</p>
<p><b>Weighted Regents pass rates (HS / HST / YABC)</b></p>	<p>The weighted Regents pass rates do not sufficiently recognize the growth of students in schools serving high-achieving students because the metrics give no credit for performance above passing and these students are very likely to pass.</p>	<p><b>Under consideration for 2011-12.</b> We are considering several significant changes to the Regents metrics for 2011-12 that would differentiate among students who pass the exam at different levels. Additional analysis will be required to determine how to implement such a change.</p>

Topic	Feedback	Response
<p>Performance and progress measures for students with disabilities (All school types)</p>	<p>The Progress Report should use alternative performance measures for students with disabilities, such as:</p> <ul style="list-style-type: none"> <li>• IEP promotion criteria for grades 3-8</li> <li>• 5 or 6 year graduation rates</li> <li>• Regents scores of 55 in the Regents completion rate</li> </ul>	<p><b>No action planned at this time.</b> The growth percentile adjustments for students with disabilities in grades 3-8 approximate modified promotion criteria. The Progress Report already takes into account 6<sup>th</sup> year graduation outcomes for all students. And the State has not yet made clear whether and for how long it intends to retain the exception permitting students with disabilities to graduate with diplomas based on RCTs or Regents scores of 55. We will continue to re-evaluate treatment of students with disabilities in the Progress Report as the city and state policies evolve.</p>
<p>Balance of performance and progress (All school types)</p>	<p>Principals of schools with high absolute performance have suggested that performance should be weighted more heavily on the Progress Report. Principals of schools with low absolute performance have contended that absolute performance should receive less weight than it currently does, and progress should be weighted more heavily.</p>	<p><b>No action planned at this time.</b> The Progress Reports are intended to measure the contributions of schools to the academic progress and performance of their students, in a way that is not correlated with student demographics or starting proficiency. The emphasis on progress, along with the peer comparison methodology, helps to balance these goals.</p> <p>At the same time, we must hold our students and our schools to high standards of performance, and the new phase-in metrics focused on college and high school readiness, as well as the forthcoming assessments based on the Common Core standards, will highlight and more precisely measure student outcomes at the top of the achievement scale.</p>