



class size matters
124 Waverly Place, NY, NY 10011
phone: 212- 674- 7320
www.classsizematters.org
email: info@classsizematters.org

Class Size Matters Response to DOE comments on the proposed elimination of the November class size report

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Class sizes remain a critical problem in our schools, and have increased every year since 2007. In the early grades, they are now larger than they have been in 13 years. Reducing class size is the top priority of parents, even on the DOE's own surveys. And yet the DOE would like to eliminate the November class size reports, required by a law passed in 2005, and instead report on class sizes only in February.

The February reports, based on January 31 figures, include data on classes that have significantly already diminished in size, since thousands of NYC high school students have dropped out or been discharged by that time. Allowing the elimination of the November class size report would convey a significant distortion of reality, and prevent the public's right to know class sizes during the first few months of the year.

Numerous other official reports are based on the audited October 31 enrollment figures reflected in the November class size reports, including the DOE's capacity reports known as the "Blue Book". These figures also help determine individual school funding by the DOE. For these same officials to claim that the audited October 31 enrollment is too unreliable to recount in their class size reports is far-fetched. Moreover, eliminating the November report would also lessen the pressure on DOE to address the overcrowded conditions that NYC students continue to face each fall.

Below is our rebuttal to the DOE's response to the public testimony.

Point-By-Point Rebuttal of DOE Claims

PUBLIC TESTIMONY: We need both reports because they reflect two separate student counts – October 31 and January 30. Each report adds unique value to understanding the breadth of the problem with over-sized classes. This case is best made in viewing high

school data. Year-to-year we've seen high school class sizes show significant fluctuation between the two counts. If the administration only released the February report for instance, the public would miss the typically larger class sizes in the fall.

DOE rebuttal: *"The testimony incorrectly assumes that the DOE is providing data from the first semester in the November report and the second semester in the February report. Rather, the same underlying data is analyzed for both reports. However, the data for the November data is unaudited and not yet verified. The February report is based on audited data of school and class registers. The February report is based on the Department's official enrollment data."*

OUR RESPONSE: There is nothing in the public testimony quoted above that assumes that the February class size report contains data on class sizes during the second semester. It is true that the original point of advocating for two separate class size reports was to have figures for class sizes at the start of both semesters, including when high school classes are reconfigured in the spring. Unfortunately, the DOE has never complied with the original intent of the law, and simply uses the February report to report on the size of classes at the end of the first semester.

For DOE now to insist that they should only have to report on class sizes at the end of the first semester even more flagrantly ignores the original purpose of the legislation, which was to bring pressure on DOE to reduce class sizes as quickly as possible at the beginning of each semester, and to accurately reflect the condition of overcrowded classrooms that undermine the quality of education that NYC students receive.

As the analysis included in our original testimony reveals, high school class sizes on average fall by 4% in general education classes and 11% in special education classes between October 31 and January 31 of each year. This occurs not because the DOE has hired more teachers, but because thousands of students have dropped out or been discharged from schools over this period, in large part as a result of being subjected to inadequate learning conditions in the form of overcrowded classes. It is noteworthy that DOE did not attempt to dispute this fact.

PUBLIC TESTIMONY: The average class sizes reported in February are generally smaller than those in the November report, sometimes lower by as much as 1 to 2 students per class, especially at the high school level.

DOE rebuttal: *"Class size can be reduced due to several factors; movement between and out of NYC DOE schools, graduating students, students dropping out, discharges, etc. More importantly, the February report is based on final audited data that allows for the DOE to capture this data and ensure a more accurate picture of class size."*

OUR RESPONSE: Here the DOE admits that the February report reflects the figures AFTER students have dropped out or been discharged from school. Accurate data would reflect class sizes at the beginning of the year, before this occurs.

PUBLIC TESTIMONY: The November report contains class size data based on the October 31st register, more than a month and a half into the school year, and the date when enrollment numbers are considered official by DOE. This provides an important view of class sizes fairly early in the school year, when it is of greatest interest to parents and advocates, so that they can push to have large classes reduced. The February report is based on enrollment information as of January 30th, reflecting changes due to students being discharged, dropping out, graduating or moving from one school to another.

DOE rebuttal: *“This statement is inaccurate. The November report is snapshot of data and not the audited register of classes and class sizes. Final changes to registrars are due at the end of December, which includes the data from the first semester. The data is audited through the month of January. The February report gives more accurate data and allows for the NYCDOE to align cost to class sizes and class organization.”*

OUR RESPONSE: The reality is that the Oct. 31 audited register figures provide the basis for the DOE’s Blue Book, its official school capacity and utilization report. The Oct. 31 audited register figures also determine each school’s funding level. If it is accurate enough for these purposes, it is certainly accurate enough to use for calculating class size and reporting to the public.

Suggested Improvements in reporting on class size:

Even as it is important for the DOE to maintain two different annual class size reports, this reporting could be substantially strengthened and improved.

Each of the DOE class size reports, in November and February, currently contains multiple errors, and substantially underestimates the actual sizes of classes in many schools. This occurs because schools often count inclusion classes as two separate classes: one composed of general education students, and the other comprised of students with disabilities. This leads to the class size being reported as half its actual size.

A similar inaccuracy occurs in the case of “bridge” or mixed age classes, with students at each grade level reported as attending a separate class, even though they are assigned to the same class at the same time with the same teacher.

In some cases, the class size of different subjects (e.g. Physics I and AP Physics) is reported separately, even though again, students taking these courses are often bunched together in the same classroom at the same time, with the same teacher. In each instance that we have identified errors, they have led to DOE underreporting class sizes as significantly smaller than they are in reality.

It would be relatively simple for officials to devise a more accurate way of calculating class sizes, by sorting ATS register figures by room number and class period. Yet they have refused to do so, despite repeated requests. It is disconcerting that the DOE, which has spent millions of dollars devising data systems to collect test scores for accountability purposes, refuses to make any adjustments to allow for more accurate reporting of class size.

It would also be beneficial if DOE agreed to abide by the intent of the law, and in its second annual report included data on class sizes during the second semester when high school classes are reconfigured, rather than simply report on smaller class sizes at the end of the first semester, after thousands of students have dropped out or been discharged from school.

Conclusion:

We urge the members of the Commission to maintain the mandate for two separate class size reports, one in the fall and the other in the spring. Additionally we ask the Commission to recommend that DOE officials strengthen and improve their reporting on this critical issue, to ensure that their reports accurately reflect the overcrowded conditions that NYC students face and that substantially undermine the quality of the education they receive.