

SUPREME COURT OF NEW YORK
COUNTY OF KINGS

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In the Matter of

JOANNE ADAMS, individually, and on behalf of her child,
Y.A., who attends P.S. 25; SHAKEMA ARMSTEAD,
individually, and on behalf of her child, D.M., who attends
P.S. 25; and CRYSTAL WILLIAMS, individually, and on
behalf of her two children, H.T. and K.T., both of whom
attend P.S. 25,

Petitioners,

—against—

BOARD OF EDUCATION OF THE CITY OF
NEW YORK,

Respondent,

For an Order, Pursuant to Article 78 of the CPLR and
Section 2590-e(11) of the Education Law, Annulling the
Decision to Close P.S. 25 in the County of Kings.

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STATE OF NEW YORK)
) ss.:
COUNTY OF KINGS)

Index No.: 506124/2018

**AFFIDAVIT OF
LEONIE HAIMSON
IN SUPPORT OF
ORDER TO SHOW
CAUSE AND
TEMPORARY
RESTRAINING
ORDER**

LEONIE HAIMSON, being duly sworn, deposes and says:

1. I am Leonie Haimson, and I make this affidavit in support of the application for an order to show cause and temporary restraining order not to close P.S. 25 this school year and for the school to remain permanently open as an elementary school.
2. I am the Executive Director of Class Size Matters, a non-profit research and advocacy organization based in New York City, dedicated to providing information on the benefits

of smaller classes to parents, teachers, school board members, and concerned citizens nationwide.

3. Compelling and rigorous research has linked small class sizes with a variety of cognitive and non-cognitive benefits for students and teachers, both short and long-term. In fact, class size reduction is one of only a handful of K12 reforms cited by the Institute of Education Sciences (2003) as proven to increase student achievement through rigorous, experimental studies, the “gold standard” of evidence.¹
4. Reducing class size is among an even smaller number of education reforms that have been shown to narrow the achievement gap between ethnic, racial and economic groups, in terms of test scores, grades, graduation rates, and students headed for college. Its benefits are particularly pronounced for lower-income students and children of color, who experience two to three times the gains from smaller classes as average students.
5. P.S. 25 has class sizes of 10-18, with an average of 14.7 students per class. In the view of many experts, class sizes of 15 are ideal, especially for high-needs students. According to DOE data, fewer than 2.5 percent of elementary school students are in class sizes this small, and 18.8 percent are in classes of 30 or more.²
6. P.S. 25 is composed of 94 percent Black and Hispanic students and 85 percent are economically disadvantaged students. Its small classes are one of the major reasons that the school has been so successful in boosting the achievement of the student population it

¹ Institute of Education Sciences. (2003). *Identifying and Implementing Educational Practices Supported by Rigorous, Evidence: A User Friendly Guide*. United States Department of Education. Retrieved from https://www.classsizematters.org/wp-content/uploads/2012/10/rigorous_evidence_guide_IES__3_1.pdf

² <http://schools.nyc.gov/AboutUs/schools/data/classsize/classsize.htm>

serves by 21 percentile points compared to similar students, according to the Department of Education's performance dashboard.³

7. Small classes are especially important for students with disabilities, who require more intensive feedback and support from their teachers. Thirty-one percent of students at P.S. 25 have disabilities, and their performances far exceed other similar students with disabilities, according to the DOE performance dashboard. They outperform their peers in other New York City public schools by 45 percentile points in ELA and 21 percentile points in math.
8. Smaller classes have also been found to have a positive impact on school climate, student socio-emotional growth, suspension rates, parent engagement, and teacher attrition, especially in schools with large numbers of disadvantaged children.
9. A literature review by Wilson (2002) noted that according to the Tennessee STAR study, a large-scale randomized experiment in grades K-3, grade retention was lower for students in small classes: 17 percent of students from small classes were held back, compared with 30 percent and 44 percent respectively from 'regular' and 'regular plus aide' classes.⁴ Also, fewer students who were in smaller classes in the early grades had dropped out of school by tenth grade.
10. Finn *et al.* (2005) found that four years of a small classes in K-3 improved the odds of graduating from high school by about 80 percent.⁵

³ https://tools.nycenet.edu/dashboard/#dbn=16K025&report_type=EMS&view=City

⁴ Valerie Wilson. (2002). *Does Small Really Make a Difference*. SCRE Research Report 107, Retrieved from <https://www.classsizematters.org/wp-content/uploads/2012/11/107.pdf>

⁵ Jeremy D. Finn *et al.* (2005). *Small Classes in the Early Grades, Academic Achievement, and Graduating from High School*. *Journal of Educational Psychology*, vol. 97, no. 2. Retrieved from <https://www.classsizematters.org/wp-content/uploads/2012/10/Small-Classes-in-the-Early-Grades-Academic-Achievement-and-Graduating-From-High-School.pdf>

11. In a study commissioned by the US Department of Education, McLaughlin *et al.* (2000) analyzed the performance of students in over 2500 schools on state exams adjusted for difficulty via their scores on the NAEP (national) exams.⁶ This analysis showed that after controlling for student background, the only factor positively correlated with student test scores was class size. In this study, student achievement was even more strongly linked to smaller classes in the upper than the lower grades.
12. Dynarski *et al.* (2013) estimated that assignment to small classes increased the probability of attending college by 2.7 percentage points, with effects more than twice as large among blacks.⁷ Among students with the lowest probability of attending college, the increase in college attendance was 11 percentage points. They also found that having a smaller class in the early grades significantly increased the probability years later of a student attending college, earning a college diploma, and majoring in a STEM field (science, technology, engineering, or mathematics).
13. Small classes have also been found to have a positive impact on parent engagement, which in turn has been shown to have a positive impact on learning. Bohrnstedt and Stecher (1999) concluded that parents of students in reduced size classes had more contact with teachers and were more satisfied with their children's education.⁸
14. Teacher attrition is significantly reduced when they are assigned to small classes. Loeb *et al.* (2005) examined data from teacher surveys and school-level data to determine the

⁶ Donald McLaughlin *et al.* (2000). *School Level Correlates of Academic Achievement*. Retrieved from <https://nces.ed.gov/pubs2000/2000303.pdf>

⁷ Susan Dynarski *et al.* (2013). *Experimental Evidence on the Effect of Childhood Investments on Postsecondary Attainment and Degree Completion*. *Journal of Policy Analysis and Management*, vol. 32, no. 4. Retrieved from <http://www.sesp.northwestern.edu/docs/publications/1285521367551ee986dbdcc.pdf>

⁸ George Bohrnstedt *et al.* (1999). *Class Size Reduction in California 1996-98: Early Findings Signal Promise and Concerns*. Retrieved from https://archive.org/stream/ERIC_ED432809#page/n0/mode/2up

relationship between occupational conditions and teacher turnover.⁹ They found that the presence of very large classes significantly increased teacher turnover.

15. Ingersoll (2015) noted that job dissatisfaction is the leading factor behind teacher turnover, with 54% of teachers who leave their school reporting that large class sizes contributed to their decision.¹⁰ Lower rates of teacher attrition in turn leads to a more experienced workforce, which synergistically result in more effective teaching, more learning, and an improved school climate.
16. In short, forcing the closure of P.S. 25 and the transfer of its largely disadvantaged students to other schools will likely cause significant harm to their opportunity to learn, their social-emotional development, and their future success in school and in life, for years to come.
17. For more of the published research showing the benefits of smaller classes, I refer you to

⁹ Susanna Loeb *et al.* (2005). *How Teaching Conditions Predict Teacher Turnover in California Schools*. Peabody Journal of Education, vol. 80, no. 3. Retrieved from <https://www.classsizematters.org/wp-content/uploads/2016/09/loeb-et-al.pdf>

¹⁰ Richard Ingersoll. (2015). *Why Schools have Difficulty Staffing their Classrooms with Qualified Teachers*. Retrieved from <http://blueribbon.sd.gov/docs/Ingersoll%20Presentation819.pdf>

the Appendix, with these two fact sheets, *Summary of Class Size Reduction Research* and *Benefits of Class Size Reduction*.^{11,12}

Dated: May 16, 2018 New York, New York



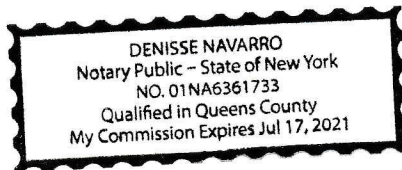
Leonie Haimson

Sworn to before me this

16th day of May, 2018



Notary Public



¹¹ Leonie Haimson and Katie Donnelly. (2016). *Summary of Class Size Reduction Research*. Class Size Matters. Retrieved from <https://www.classsizematters.org/wp-content/uploads/2017/01/Summary-of-US-Class-Size-Reduction-Research.pdf>

¹² Leonie Haimson. (2013). *Benefits of Class Size Reduction*. Class Size Matters. Retrieved from <https://www.classsizematters.org/wp-content/uploads/2013/06/CSR-national-fact-sheet1.pdf>