



Response to
New Bedford Public Schools
District Review

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Introduction

The city of New Bedford welcomed the four-day visit of the Massachusetts Department of Elementary & Secondary Education (DESE)'s review team in November 2010. Like any other urban district with significant poverty levels, a large number of students for whom English is not a first language, and a difficult budget, New Bedford faces real challenges in ensuring that all of its children can thrive as citizens in the 21st century. The city will not accept the status quo and believes that DESE has provided constructive criticism and important suggestions about how to improve New Bedford's schools.

Although DESE's May 2011 report ("the Report") contains many excellent recommendations, it also lacks full perspective. First, the simultaneous rigidity and lack of rigor in DESE's review protocol renders the Report untimely and in some areas inaccurate. DESE's strict adherence to the "snapshot" approach, in which it looks at school systems only as they exist at the time of review, caused it to ignore important initiatives planned by the district, but that were not yet fully underway. As a result, the Report states the obvious and offers solutions that the district itself had already identified. At the same time, DESE's heavy reliance on unscientific focus groups and interviews yielded information that in some cases was unrepresentative and misleading. Among other things, this resulted in inaccurate statements impugning New Bedford's teachers, the vast majority of whom work tirelessly and effectively for their students.

A second major problem with the Report is that it makes substantive recommendations that, while worthwhile, are not within New Bedford's current financial means. The city looks forward to working with DESE to secure funding to implement these recommendations, but as DESE well knows, some of them are beyond the city's financial capabilities.

Perhaps the most significant flaw in the Report, however, is that it does not view New Bedford in the context of other urban districts. As a result, DESE fails to understand the significance of its own statistics and to see the long-term, widespread, unintended consequences of its academic reform system. New Bedford fully recognizes that, as compared to the entire state, some of its schools have low test scores. When compared to other Gateway Cities, though, New Bedford's statistics are not aberrations. Rather, they are symptomatic of a national crisis in urban education that can only be fully resolved by systemic policy changes both inside and outside the classroom. By viewing New Bedford in isolation, the Report obscures these broader imperatives and implies that the district can transform its schools alone.

The purpose of this response is to present New Bedford's view of the issues discussed in the Report so that DESE and the city can move forward together based on a common understanding of the facts. The response acknowledges where the district can do better, describes where the Report is inaccurate or misleading, and identifies the areas in which major policy changes are most necessary. The response also presents the additional costs associated with the Report's recommendations (approximately \$11,372,685) so that DESE and the district can immediately develop a funding strategy together. The city is eager to discuss and work to resolve all of these issues with DESE on June 13 and beyond.

I. Overarching Concerns

The city has several overarching concerns about the Report. First, the city has reason to believe that the review process itself was insufficient and methodologically flawed. The city is also troubled by the minimal context the Report provides in describing New Bedford's performance, its selective reporting of data, and its heavy reliance on standardized test scores to measure student performance. And while many of the Report's recommendations seem theoretically sound, they are largely presented without regard to budgetary constraints and, as such, are not always immediately implementable.

A. Methodological Flaws

Ineffective use of time spent in New Bedford: The city believes there were a host of methodological flaws in the review process, beginning with the fact that the team did not utilize its time in New Bedford to arrive at an accurate picture of the efforts being undertaken in each school. As the Report notes, New Bedford has 26 public schools, and the total student enrollment for the 2010-11 school year is 12,538 students. New Bedford's school system employs 920 teachers, 50 school-based administrators, and 17 district administrators. It is one of the ten largest school districts in Massachusetts. According to the most recent census, New Bedford's total population is 95,072 (not 91,112, as stated in the Report).

Yet despite the size and complexity of the district, the reviewers spent parts of four days in New Bedford and conducted classroom observations on three of those days. According to the Report, they made a total of 48 classroom visits, visited 11 schools, and their observations ranged from 20 to 30 minutes each. Stated another way, the review team collectively dropped in and out of 16 classrooms each day for three days conducting classroom observations, and they visited half of New Bedford's schools. During these three days, there were thousands of classes taking place in the 26 schools. DESE's limited observations were hardly a thorough sampling of classroom conditions or teaching techniques.

Volunteer focus group participants: A fundamental flaw with the review was that the techniques used by the reviewers appear to have been applied improperly. As the Report acknowledges, the reviewers used focus groups and interviews to obtain much of their information. But the teacher focus groups consisted of interviewees who volunteered, rendering them largely ineffective as a tool for obtaining unbiased and representative information. When focus group participants are all self-selected, there is a danger that individuals with unrepresentative viewpoints can constitute a majority of the group and dominate discussions and lead to inaccurate conclusions and recommendations. As an example of how this phenomenon affected this particular Report, the district later learned that the elementary school teacher focus group consisted mainly of former coaches (i.e., individuals who served as coaches the previous school year and who returned to classroom positions in the district's effort to reduce class size), when one of the key issues in the focus group was their efficacy. It is difficult to believe that a focus group of former coaches would be unbiased as to their own utility.

Problems with interviews: The district has also learned of a multitude of problems with the interviews. On their own initiative, a number of interviewees complained to school officials that the reviewers had, among other things: asked leading questions, frequently with negative predicates; interrupted them; put words in their mouths; excluded key personnel from interviews; demonstrated a lack

of understanding of interviewees' roles; and/or disregarded responses that did not match seemingly predetermined answers or support seemingly predetermined conclusions.

The superintendent herself had this last experience, when she attempted to explain the School Committee's rationale for eliminating coaching positions in an effort to maintain small class size. Rather than considering the superintendent's explanation, the reviewer repeatedly told her that "the School Committee still [had] to make sound educational decisions," thereby assuming, without any real consideration, that the district's decision had been unsound.

Inaccurate and incomplete notes: Months later, it also became apparent that the reviewers had in some cases taken inaccurate and/or incomplete notes. For example, the superintendent and other central personnel learned that they had been misquoted in reviewers' notes on important issues, such as whether assessment data had ever been provided to the School Committee. These serious errors raise questions about the accuracy of notes from other interviews and focus groups, whose participants would not have had the opportunity to review and correct the draft report.

Significant omissions: Equally troubling is the fact that DESE disregarded important information specifically brought to its attention. In certain instances, they ignored evidence demonstrating that the draft report contained errors. In other instances, they explicitly told the district that DESE review protocol precluded them from considering information about efforts that had begun after the review. These omissions, which are detailed more fully later in this response, create the false and misleading impression of a district in denial, when in fact the district had already diagnosed and begun to address many of its problems.

B. Insufficient Context for and Selective Reporting of Data

Two other broad flaws in the Report are that it provides inadequate context for and selectively reports key data. As a result, the Report does not accurately reflect New Bedford's challenges or its improvements.

No recognition of demographic and socioeconomic challenges: The Report provides a snapshot of the New Bedford public school system at a specific point in time, without establishing sufficient context. For example, the Report fails to acknowledge the significant demographic changes that have occurred in the district in the past decade. As noted by UMass Dartmouth's Urban Initiative in its January 2011 report, "Analysis of MCAS Performance: New Bedford Public Schools," since 1999 New Bedford has seen: (1) an increase of more than 40% in the number of students for whom English is not their first language; and (2) a nearly 25% increase in the number of low-income students. Each of these increases is substantial and creates unique challenges for the school system. The 2010 census numbers also reveal changes in the city's demographics. For example, between 2000 and 2010, New Bedford's Hispanic population grew from 10.21 to 16.7% of the population.

The Report also fails to acknowledge the extraordinarily difficult conditions under which many of New Bedford's children live. A February 2011 report by Massachusetts KIDS COUNT, "Child Poverty in Massachusetts: a Tale of Three Cities," notes that:

- New Bedford's child poverty rate is 36%, which is the fourth highest percentage in Massachusetts.

- New Bedford’s teen birth rate is the fourth highest teen birth rate in the state, at 67 per 1,000 births.
- Thirteen census tracts in New Bedford qualify for hunger designation, making it one of the top hunger designation cities in the state.
- In 2007, there were 577 homeless youth enrolled in New Bedford schools.

The Report makes no mention of these statistics, despite the fact that it is well-established that socioeconomic factors have a tremendous impact on learning. Governor Patrick emphasized this point in a February 2011 speech to the leaders of Gateway Cities, stating, “Teachers are *not the problem*. Poverty is the problem.” (Emphasis in original). See also Joe Nocera, “The Limits of School Reform,” New York Times, April 25, 2011 (“social scientists have contended – and unquestionably proved – that students’ socioeconomic backgrounds vastly outweigh what goes on in the school as factors in determining how much they learn”); Diane Ravitch, “Waiting for a School Miracle,” New York Times, May 31, 2011 (“If every child arrived in school well-nourished, healthy and ready to learn, from a family with a stable home and a steady income, many of our educational problems would be solved.”). A fair appraisal of New Bedford’s performance would have taken its socioeconomic realities into account.

Exclusive comparison to the state: A related point is that the Report fails to provide sufficient context because it compares New Bedford student performance data solely to statewide data, not also to data from districts with similar profiles (e.g., in terms of economics, churn rate, students for whom English is not a first language). Had the Report compared New Bedford to other Gateway Cities in Massachusetts, it would have found that New Bedford’s scores are not aberrations. Rather, for years New Bedford’s MCAS scores have been near the average for Gateway Cities in both English Language Arts and mathematics.

To the extent that the DESE district reports are supposed to drive improvements and policy changes, it is critical to place New Bedford and other districts in the context of their peers. When a district with substantial challenges is compared only to the entire state, the easy conclusion is that the district is an outlier and that its personnel are to blame for low student performance. But when a district is compared to similar districts, and they are found to have comparable MCAS scores, it becomes clear that more systemic change is needed, including by providing assistance to families outside of the school walls. By failing to place New Bedford in context of other Gateway Cities, the Report avoids important policy questions about how to improve urban education.

Insufficient acknowledgment of improvements over time: Because the report takes a snapshot approach, it also does not sufficiently acknowledge improvements that have occurred in New Bedford. While it does compare some data from 2008 to 2010, it ignores other important statistics showing progress. For example:

- Between 2006 and 2010, the percentage of New Bedford students scoring at or above proficient increased from 24% to 39% in mathematics.
- Between 2006 and 2010, the percentage of New Bedford students scoring at or above proficient increased from 39% to 44% in English Language Arts.
- Between 2006 and 2009, the percentage of New Bedford eighth graders enrolled in algebra increased from 15% to 25%.

- Between 2006 and 2010, the percentage of New Bedford high school juniors and seniors enrolled in at least one Advanced Placement course increased from 9% to 16%.
- Between 2006 and 2009, New Bedford narrowed the difference between its CPI in mathematics and that of the state from 14.7 to 11.9.
- New Bedford's annual dropout rate decreased from 10.4% in 2005 to 8.1% in 2010.
- From 2006 to 2011, the number of New Bedford seniors who reported they were going to college was 2,469.
- Between 1999 and 2009, the percentage of adults in New Bedford age 25 and older with a high school diploma increased from 58% to 67%.

The most glaring omission of improvements in New Bedford schools is the Report's failure to mention that in September 2010, eight New Bedford elementary schools were designated commendation schools by the state. Four schools (Carney, Dunbar, Lincoln, and Rodman) were commended for exiting 2009 No Child Left Behind status, and four schools (Congdon, Gomes, Pacheco, and Swift) were commended for narrowing the proficiency gap. New Bedford tied Boston, which is a much larger district, for having the most Title I schools designated as commendation schools. Each of New Bedford's commendation schools received \$10,000 to support dissemination of best practices to lower performing schools in the district.

Selective reporting of data: Another issue with the Report is that even taking the snapshot approach, it selectively reports negative data and fails to mention positive data. New Bedford is well aware that its MCAS scores need to improve, particularly at the middle and high school levels. But the Report neglects to mention that several of New Bedford's elementary schools outperformed even the state in spring 2010 MCAS tests. For example:

- At Winslow Elementary, 74% of students were advanced/above proficient/or proficient in English Language Arts, as compared to the statewide average of 68%; and 62% were advanced/above proficient/or proficient in mathematics, as opposed to the statewide average of 59%.
- At Campbell Elementary, 66% of students were advanced/above proficient/or proficient in mathematics, as compared to the statewide average of 59%.
- At Pacheco Elementary, 68% of students were advanced/above proficient/or proficient in mathematics, as compared to the statewide average of 59%.
- At Carney Academy, 63% of students were advanced/above proficient/or proficient in mathematics, as compared to the statewide average of 59%.
- At Taylor Elementary, 62% of students were advanced/above proficient/or proficient in mathematics, as compared to the statewide average of 59%.

Also, in a March 2011 DESE Quality Full-Day Kindergarten site visit report, two New Bedford elementary schools, Winslow and Rodman, were cited for having received NAEYC accreditation, which is highly prestigious. Among other things, the report commended the district for its commitment to maintaining small class size. By failing to cite these examples, the Report creates the impression of a district with no successes, when in fact New Bedford's elementary schools have lessons to offer their counterparts statewide.

C. Myopic Focus on Standardized Test Scores

Another overarching problem with the Report is that the reviewers' myopic focus on standardized test scores and data blinded them to other measures of success in the district. Standardized test scores are not the only indicia of accomplishment, and there is a growing consensus that their overuse is harming public education in the United States. Just this March, President Obama told a Washington, D.C. town hall, "Too often what we have been doing is using these tests to punish students or to, in some cases, punish schools." He elaborated:

One thing I never want to see happen is schools that are just teaching the test because then you're not learning about the world, you're not learning about different cultures, you're not learning about science, you're not learning about math . . . All you're learning about is how to fill out a little bubble on an exam and little tricks that you need to do in order to take a test and that's not going to make education interesting . . . And young people do well in stuff that they're interested in. They're not going to do as well if it's boring.

When Governor Patrick addressed leaders of Massachusetts' Gateway Cities this February, he underscored the importance of innovation in education, stating:

So today, I challenge you to try something new. If you always do what you did, you will always get what you always got, you know that. Try something new. Try having a local college come in and partner with the school to lift that school out, and setting some specific benchmarks that you together will hold yourselves accountable to. Try asking a local museum to come in and take responsibility for a particular class or particular subject matter, to partner with you. Try engaging local businesses and after school programs or extended day programs, which we all know make such a difference. Try leaving aside that tired, old complaint that teachers and their unions are the problem.

Despite having to devote substantial time to MCAS preparation, New Bedford has, in addition to the programs listed in the Report, a number of innovative and successful programs that do exactly what Governor Patrick prescribed. And consistent with President Obama's objectives, these programs are anything but boring.

For example, in September 2010, New Bedford High School began a partnership with Bridgewater State University and the New Bedford Regional Airport to introduce students to careers in aviation. Students took a semester long honors-level "Principles of Aviation" course, which included field trips to the airport and the Aviation Expo in Boston, the use of flight simulators, presentations by Bridgewater State University professors, and a variety of aviation/physics content labs. The course will be offered again both semesters of the next school year.

New Bedford also has a comprehensive out-of-school time program, funded through Bank of America and competitive 21st Century Community Learning Centers grants, that has 16 sites and serves approximately 1,600 students annually. Some highlights from this program, which is just but one aspect of New Bedford's student support services, are:

- A partnership with the Naval Undersea Warfare Center Division, in which New Bedford middle and high school students work with scientists and participate in regional competitions in underwater robotics and *Math Counts* leagues. In both 2010 and 2011, New Bedford students came away winners at the regional MATE ROV competition (an underwater robotics competition) and qualified for the international competition.
- A partnership with Bristol Community College, which provides Youth College programming at elementary schools and focuses on science and technology, using Lego Engineering, MIT's Scratch programming, robotics, and Computer Aided Design projects.
- A program established at New Bedford High School in which students participate in high interest educational activities directly linked to career and college tracks and community partners, including: public speaking, debate, computer refurbishing, web design and hosting, boat building, environmental science, green energy, and the arts. Instructors from Bristol Community College lead the green energy activities, and participating students earn both high school and college credit.

Some popular and successful extra-curricular activities in the district include:

- JROTC: The United States Army Junior Reserve Officer Corps of New Bedford High School is a program with a mission to motivate young people to become better citizens. The program began in 1881 at New Bedford High School, and this year marks the 130th anniversary of the New Bedford High School Corps of Cadets. Today's Corps of Cadets has over 200 students, who participate in school and community service events throughout the school year.
- Athletics: Approximately 21% of New Bedford's student athletes received grades of all A's during their seasons of competition. New Bedford's men's and women's athletic teams have had notable successes this year.
- Band: The Band program, which includes concert band, marching band, jazz band percussion ensemble and color guard, has approximately 450 fourth and fifth grade participants, 250 middle school participants and 50 high school participants. The New Bedford High School Marching Band has performed and competed at over 30 events this year, and honors have included placing first in their division at a New England Scholastic Band Association (NESBA) competition.
- Choral: Approximately 700 elementary students, 250 middle school students, and 70 high school students participate in the Choral program. At the high school there are large and small vocal ensembles, including the Concert Chorale, Jazz choir, A cappella choir, and Treble Choir. Notable honors this year include gold medals at each of three regional competitions.

Despite the district having provided information about some of these programs and others, the Report barely mentions them. By focusing narrowly on standardized test scores and other data, DESE missed significant initiatives that pique students' interest and provide a whole education, which is something that standardized tests never do.

D. Analysis and Recommendations Made in Budgetary Vacuum

The final broad problem is that the Report largely ignores budgetary issues. While the sections on financial and asset management recognize that New Bedford operates under severe financial constraints, the substantive recommendations are generally made without consideration of their financial or human resources implications, including whether they would require the hiring of additional staff or the expansion of duties for existing staff who are already working at maximum capacity. As described later in this response, New Bedford has calculated that the Report's recommendations would cost the district at least \$11,372,865, which is money that New Bedford does not have access to from either the state or federal government.

By largely ignoring the financial realities, the report elides the question of whether New Bedford and other cities can narrow the achievement gap with existing levels and systems of funding. Although it is not DESE's role to make recommendations about how public school systems are funded, it is entirely within its expertise to state whether the current levels of funding are adequate. In saying little about this issue, DESE creates the impression that financial resources are but a minor issue in improving public schools, when in fact it is one of the major issues.

II. Comments on Specific Findings and Recommendations

In addition to its overarching concerns, New Bedford has comments on each of the six substantive areas addressed in the Report. Although the district agrees with some of the Report's findings and recommendations, the Report contains numerous factual errors, rendering other recommendations inapposite. Moreover, the Report fails to acknowledge that even prior to the review process, New Bedford had already begun to take steps to address many of the issues identified in the Report. Instead of recognizing these efforts, the Report portrays New Bedford as a district without a plan, a characterization that is both inaccurate and unconstructive. This response presents an overview of the state of education in New Bedford so that future discussions and collaborations between DESE and the city are based on a common understanding of the actual facts.

A. Leadership and Governance

School committee attention to budget, policy and student performance: The statements that the School Committee pays too little attention to issues of budget, policy, and student performance are incorrect. A review of the meeting minutes from September 2009 to present shows that the School Committee discussed these matters at length. For example, the following issues were discussed at meetings on the following dates:

- The budget: September 2009, December 2009, February 2010, March 2010, April 2010, May 2010, June 2010, July 2010, and August 2010.
- MCAS scores and other student performance data: September 2009, March 2010, September 2010, and March 2011.
- Class size: September 2009, July 2010, September 2010, and April 2011.
- Dropout prevention, college readiness, and attendance issues: January 2010, March 2010, November 2010, December 2010, February 2011, and April 2011.

- Curriculum development and new academic initiatives: November 2009, February 2010, April 2010, June 2010, September 2010, October 2010, November 2010, December 2010, January 2011, and April 2011.
- Race to the Top: November 2009, December 2009, January 2010, May 2010, August 2010, September 2010, October 2010, November 2010, and December 2010.
- Parker Elementary (the district's sole Level 4 school): March 2010, April 2010, May 2010, June 2010, August 2010, September 2010, October 2010, November 2010, December 2010, and April 2011.

Moreover, the full School Committee meetings are not the only occasions on which the School Committee addresses budget, policy, and student performance, a fact that the reviewers wholly ignored. The School Committee also has Sub-Committees, including the Curriculum, Policy, and Finance Sub-Committees, that have regular public meetings. The district offered to provide DESE with the Sub-Committee meeting minutes, but it did not respond to the offer. The Sub-Committee minutes from September 2009 to present also show substantial attention to budget, policy, and student performance. For example, the Curriculum Sub-Committee discussed: dropout prevention strategies and dropout data from the preceding five years; MCAS scores and the central role of teachers in student achievement; Race to the Top priorities, including specific performance measures for the district; college access and readiness initiatives; and the high school science curriculum. The Policy Sub-Committee meetings included discussions of anti-bullying, discipline, and wellness policies and student conduct; and at all of the Finance Sub-Committee meetings, the members discussed the district budget and approved financial statements and warrants.

The work done at the Sub-Committee level helps enable the full School Committee to devote a portion of its agenda to community issues. Although the Report criticized the community component of School Committee meetings, New Bedford believes it promotes civic culture and strengthens the ties between the schools and the public. The community focus at the School Committee meetings is appropriate and will continue.

Also, as mentioned to DESE but not included in the Report, the mayor and superintendent meet at least weekly to discuss educational issues. Important new initiatives have emerged from these discussions, including an additional partnership with Bristol Community College for the potential delivery of early college high school course work; the expanded partnership with the Naval Undersea Warfare Center Division; exploration of innovation schools; an expansion of technology mediated instruction through the acquisition and utilization of iPads; web-based educational opportunities through the Calvert School in Baltimore, Maryland; an expanded partnership with Bridgewater State University; educational programming through cable access; after-school programming at all three levels of schools; and a free night school initiative.

Finally, it is worth noting that an initial draft report stated that the School Committee did not receive assessment data and that its members did not have educational backgrounds, two facts that the district demonstrated to DESE to be wrong. That such serious errors were made in first place raises questions about the overall adequacy and seriousness of the reviewers' examination of the School Committee.

Although New Bedford believes that that Report inaccurately characterizes the School Committee's work, it is always looking for ways to do better and adopt best practices. The School Committee and superintendent will give careful consideration to the recommendation that they seek out resources available through DESE and the Massachusetts Association of School Committees. The School Committee will also examine whether it can delegate certain decisions to administrators for them to make in accordance with district policy as established by the School Committee.

Principals appointed by superintendent: The Report states that the School Committee appoints principals, but the district gave the reviewers extensive documentation demonstrating that it is the superintendent who appoints them. The Report misconstrues the principal appointment letters it reviewed as showing that "appointments require a vote of the school committee." This is incorrect. The superintendent simply sends the appointment letters to the School Committee for notification purposes, and the School Committee then votes merely to "receive and place on file" the letters as part of the personnel report. That the School Committee vote is not one of appointment is demonstrated by the fact that some of the letters supplied to DESE show that School Committee notification was scheduled to occur after the date of the appointment letter.

New Bedford does recognize, though, that in contrast to School Committee practice, its written policies regarding principal appointment are outdated and do not comport with the Education Reform Act of 1993. New Bedford will take steps to ensure that its written policies are updated to reflect the law and existing practice.

Central leadership and capacity: The recommendations section of the Report contains a laundry list of criticisms of the central office that are also contained in other sections, such as those on curriculum and instruction, assessment, human resources and professional development, and student support. In the interest of efficiency, this response will deal with those recommendations in their substantive sections. However, it is necessary to note here that soon after assuming her position in April 2010, the superintendent began to take steps to address many of the issues described in the Report. Any notion that there has not been high-level attention to improving New Bedford's schools on a district-wide level is simply false.

Moreover, the School Committee recognized long before the Report was issued that the central office needed additional high-level personnel. As a result, the district has already begun interviewing for two new positions, an Assistant Superintendent for Accountability and School Improvement and an Administrator for Curriculum and Instruction. These positions, the functions of which are described in subsequent sections, will enable the superintendent to spend more time with principals and in the schools.

Principal accountability: New Bedford wholeheartedly agrees that, in accordance with the law and good practice, principals should be evaluated annually and held accountable for student performance. In order for evaluations to be fair and accurate, they should be based on a full academic year. As such, the superintendent is in the midst of evaluating principals for the year 2010-11. Going forward, New Bedford is committed not only to evaluating principals annually, but also to taking swift action if principals are not performing satisfactorily.

B. Curriculum and Instruction

The section on curriculum and instruction contains some important and valid criticisms, many of which New Bedford is already in the process of addressing in significant ways. These efforts are not mentioned in the Report, perhaps because of the snapshot approach. Nonetheless, their omission is troubling and gives the false impression that New Bedford has not yet identified its own pressing needs.

1. Instruction

When the superintendent assumed her position in April 2010, she immediately identified core instruction and the learning environment as top priorities for the district. Focusing on these priorities, the district is launching two multi-year initiatives with nationally known organizations, one with Research for Better Teaching (“RBT”), a school improvement organization based in Acton, and one with the Efficacy Institute, a Waltham-based organization.

“Research for Better Teaching”: Through its “Studying Skillful Teaching” program, RBT will work with the district on core instruction, both by providing instruction to teachers and by teaching principals and administrators how to observe classrooms and support teachers more effectively. RBT will also provide regular classroom support, most likely spending two to three days in the district per week. In the first phase of the program, which will launch this summer and continue into the fall, 35 teachers from various schools and levels will attend a total of 36 hours of sessions focusing on lesson design, communicating high expectations, using data to inform instruction, and employing a variety of instructional strategies. Another group of 35 teachers will participate in the same sessions in early 2012, and additional sessions for different teachers are planned to occur every six months after that, with the goal being that all teachers eventually participate in the program. This fall, a group of 35 principals and other administrators will participate in RBT’s seven-session “Observing and Analyzing Teaching” course, the aim of which is to “expand formal and informal leaders’ capacity to influence teachers’ teaching – and thus to have a positive impact on student performance.” (New Bedford also plans to work extensively with RBT on data; those efforts are described in the subsequent section).

New Bedford takes very seriously the findings and recommendations in the Report on curriculum and instruction and was particularly disturbed by some of the classroom observations (especially at the high school), including: the failure to maximize the time available for learning; the lack of daily learning objectives; and the failure to employ varied instructional strategies that activate students’ prior knowledge and emphasize advanced reading skills. Given the small number of classrooms the reviewers visited, the district does not believe that the classes observed were representative of the district as a whole but rather were aberrations. Please note, though, that it is hard to reconcile the Report’s observation that classroom instruction was highest at the middle school level with the middle school test scores. Regardless, New Bedford is committed to ensuring that its teachers know and employ the most effective instructional techniques available and that they maximize every moment of classroom time. Teachers who do not or are unable to master these concepts will not continue in the system. New Bedford believes that the RBT program will play an important role in helping it achieve this goal.

“Efficacy Institute”: The district is engaging the Efficacy Institute on the learning environment and specifically to help New Bedford develop a culture in which the whole community believes that its students can achieve. The Efficacy Institute’s work is “rooted in the belief that intellectual capacity is

neither fixed nor given; rather, you can *get smart*.” The program, which will include workshops, coaching, and training and will involve educators, parents, community leaders, and students, will initially launch in New Bedford’s three middle schools and the Hayden-McFadden Elementary School, but the goal is to expand it district-wide. The changes in student and community mindset promoted by the Efficacy Institute’s work will complement the RBT program by creating more fertile ground for improved instruction.

Technology Mediated Instruction: During the past year, the district also made important strides in improving instruction through the targeted use of technology to support classroom instruction and personalized learning. In the fall of 2010, the district hired a consultant to provide support to principals and teachers in using the Remediation and Training Institute’s ExtraLearning program and other online learning opportunities, and implementation is moving forward on a rolling basis. To further support technology mediated instruction efforts, the district is beginning a partnership with Friends Academy in Dartmouth in the use of technology in the classroom and online professional development. The partnership also involves collaboration with Harvard University in use of their WIDE World online teacher training.

Principal observations: The Report is correct in stating that nothing in the collective bargaining agreement prevents principals from taking notes during informal observations. An informal survey of principals reveals that they generally believe that they can take notes during informal observations and that the misperception described in the Report (*i.e.*, that they cannot take notes) is not prevalent. Nonetheless, the district will not only ensure that all principals know that they can take notes during informal observations, but it will also encourage them to do so. New Bedford is in complete agreement that principals should give teachers constructive and accurate feedback on a regular basis.

A word about the coaches: The Report repeatedly suggests that New Bedford should not have decided to eliminate its elementary level literacy and mathematic coaches in 2010-11 in an effort to maintain small class size, and it criticizes the district for having made this decision without sufficient analysis. But the reviewers themselves do not provide any research for their implied assertion that retaining the coaches (as opposed to maintaining small class size) would have been a more sound educational decision. Their conclusion appears to be based on interviews and three teacher focus groups. However, as stated earlier, the district has been made aware that former coaches constituted a majority of the elementary school focus group, so the information obtained by the reviewers was not an objective sampling of teacher opinion.

Moreover, the reviewers’ assertion that New Bedford did not make the decision with sufficient analysis is false. The district gave the decision much consideration, but, as noted earlier, when the superintendent tried to explain the decision to the reviewers, they would not engage in a substantive conversation. Instead, they told her that the district should make a “sound educational decision,” thereby assuming, without any reflection, that New Bedford’s decision had not been sound. Had the reviewers engaged in a more lengthy conversation, they might have reached a different conclusion about the depth of the district’s analysis, regardless of whether they agreed with the district’s decision.

Common instructional planning and reinstatement of coaches: The Report recommends that New Bedford increase common instructional planning time. The district agrees that this would be beneficial and has calculated that an additional hour of planning time per week (which would also include additional

common curriculum planning time) would cost approximately an additional \$1,536,585. The Report also recommends that the district restore the instructional coaching positions that it eliminated in an effort to maintain class size. Implementing this recommendation would cost the city approximately an additional \$3,080,000. The city looks forward to working with DESE to secure additional funding to implement these recommendations.

2. Curriculum

Mischaracterization of existing curriculum development: The report characterizes New Bedford's curriculum development and review process as ad hoc. However, during the school year, as well as each summer, the Academic Directors (formerly the department chairs) and their own subject-based curriculum committees have revised and reviewed the curricula for English Language Arts, mathematics, social studies, science, and fine arts. The committees each comprise a team who are paid through grant money for their curriculum work. Moving forward, the committees will take particular care to begin to align New Bedford's curricula with the Common Core Standards. Recognizing the importance of the Common Core Standards' adoption, the district sent a number of principals to DESE information sessions on them this spring. Planning is currently underway for related curriculum development and staff training in the fall.

New Administrator for Curriculum and Instruction: Although the Report mischaracterizes New Bedford's existing curriculum development and review process, its recommendation that there be a greater focus on curriculum at the central office is prudent. In fact, months before the Report was issued, the School Committee came to the same conclusion and directed the district to hire an Administrator for Curriculum & Instruction, who will be charged with district-wide responsibility for curriculum, instruction, and assessment. Upon being hired, the new Administrator will review existing practices and staffing patterns to maximize opportunities for curriculum development and implementation. The district has already begun interviewing candidates for this position.

ELA Maps and Literacy across the Curriculum: The Report was correct in observing that New Bedford's ELA maps in grades K-8 are not as well developed as those in mathematics. The district fully agrees that the ELA maps are important and is currently working on their development. New Bedford also recognizes the importance of advanced reading and higher level thinking skills, another subject of criticism in the Report. As part of its effort to improve its students' skills in these areas, the district is in the process of re-establishing a "Literacy across the Curriculum" initiative. A district-wide Literacy Action Team was constituted to develop a district-wide Literacy Plan, the first draft of which should be ready this month. The Literacy Action Team will continue to work on the Plan in July 2011 and beyond. At the high school, the district is launching an initiative modeled on that at Brockton High School, which has experienced success in student achievement and in lowering the dropout rate.

Other recommendations: In addition to the recommendations that New Bedford is already implementing, the Report recommends that the city: (1) allocate more time during the year for teachers to participate in curriculum planning; (2) consider establishing a curriculum steering committee with standing subcommittees to work on curriculum review and development during the school year; and (3) expand the model of practice in which the K-8 mathematics supervisor pays visits to all schools. New Bedford agrees that these recommendations are worthwhile. The additional costs associated with the first two recommendations are incorporated into the \$1,536,585 cited earlier that would be necessary to pay

for additional planning time. The additional cost for hiring a K-8 ELA supervisor would be \$80,000. The city looks forward to working with DESE to secure additional funding to implement this recommendation.

C. Assessment and Data Analysis

The district is in complete agreement about the importance of assessment and data analysis and has been expanding its efforts in data-driven instruction based on assessments. DESE was made aware of several of New Bedford's efforts but did not fully mention them in the Report. These omissions could have been due to the snapshot approach, which prohibited the reviewers from considering measures that had not yet been implemented at the time of the review, but the end result is an inaccurate analysis of the current state of assessment and data analysis in New Bedford's public schools.

“Research for Better Teaching”: In addition to its work on core instruction, RBT will be working with the district to enhance the use of data. This summer, 15 school-based teams of four people, each consisting of one principal and three teachers, will participate in RBT's “Unleashing the Power of Collaborative Inquiry” course, which is designed to help school personnel better understand and act upon data, both in teaching and in curriculum design. The course consists of 36 hours worth of sessions. New Bedford intends to send another group of teams to the course next winter, with the goal being that every school has participated in it. The teams will not exist solely for the purposes of the training, but will remain constituted as in-house school data teams. One of the team members will serve as a data coach and be the “go to” person about data for teachers in the building.

Additional central office personnel: The district is also increasing its attention to data at the central office level. Months ago, the School Committee directed the district to hire a new Assistant Superintendent for Accountability and School Improvement, who will have overall responsibility for, among other things, the review of all relevant district data to drive school and district improvement. The new Administrator for Curriculum & Instruction will also participate in data-driven decision-making efforts as they pertain to curriculum and instruction, as will the existing positions of Director of School Support, math supervisor, and ELA director. They will all be housed in the district's expanded data office. The addition of the high level Assistant Superintendent and Administrator positions will greatly improve the district's ability to direct and manage assessment efforts district-wide (including in coordination with the new school-based data teams) and to link assessment to curriculum, instruction, and professional development.

Inaccurate portrayal of existing ELA assessment: In addition to failing to mention New Bedford's plans in the area of data analysis, the Report inaccurately portrays the existing state of assessment in the district, particularly in ELA. Two years ago, the district made the decision to move toward using Galileo for ELA assessments in grades 3-9, and this year it made the decision to use DIBELS for grades K-2. This transition has been underway during the 2010-11 school year. The district is administering and will continue to administer these assessments multiple times during the year, which enables the central office data personnel and will enable the new data teams to provide regular feedback to improve instruction. The Report's characterization of ELA assessment as confused and rudderless is simply incorrect. Subsequent to the review, the district has been implementing a centralized plan for ELA assessments.

Other recommendations: The Report recommends that New Bedford ensure that there is a data team in each school and consider forming a district data team. These recommendations would cost the city approximately an additional \$2,905,000, excluding health care, retirement, and payroll tax costs. This figure breaks down as follows: (1) \$80,000 for a District-Wide Coordinator of Research, Testing and Assessment to oversee and coordinate data teams in each school; (2) \$2,765,000 for a full-time data coaches at 26 schools; and (3) \$60,000 for a Data Analyst, who would assemble the data obtained from the data teams. The city looks forward to working with DESE to secure additional funding to implement these recommendations.

D. Human Resources and Professional Development

Transfers should be for valid reasons: The Report creates the impression that a large number of teachers transfer from school to school in order to avoid formal negative evaluations or to flee Professional Improvement Plans. New Bedford is in complete accord that teachers should not be able to transfer for these reasons. However, the city does not believe that there is a widespread phenomenon of teachers transferring to avoid accountability. First, there are a relatively small number of transfers in any given school year. There were 46 transfers in 2010-11 and 34 in 2009-2010. Second, the district's review of those transfers reveals that four of the 2010-11 transfers and eight of the 2009-2010 transfers were due to reductions in position (*i.e.*, they were triggered by district decisions). This leaves 42 transfers in 2010-11 and 26 transfers in 2009-10 that even in theory could have been made to avoid accountability, as the Report alleges. Although the district does not keep records as to teachers' stated reasons for transferring, it believes that many of these transfers occurred for legitimate professional and personal reasons. Doing the math, it is simply impossible for a large percentage of teachers to have transferred to avoid the consequences of poor performances. At the very most, 4.5% of teachers (*i.e.*, 42 out of 920) in 2010-11 and 2.9% of teachers (*i.e.*, 26 out of 909) in 2009-2010 could even in theory have initiated transfers for accountability reasons, as alleged in the Report. New Bedford believes that the reviewers should have investigated the facts – and not relied on unsubstantiated claims from focus groups or interviews – before making inaccurate claims about transfers. As a result of the Report's conjecture, all teachers who transfer are assumed to be “weak teachers [who] . . . move from school to school every year or two to try to avoid a formal negative evaluation.”

After a careful review, the district has found that not all Professional Improvement Plans have been filed in the central human resources office. Going forward, the district will ensure that all Professional Improvement Plans are filed there. Further, to avoid any ambiguity, the district will ensure that all teachers understand that any Professional Improvement Plans will be in effect and closely monitored at the schools to which they transfer.

Little disruption because of “ownership”: Equally false is any charge that the so-called “ownership” of teaching positions creates disruption because teachers transfer back to positions they “own,” including during the middle of the school year. First, the number of teachers who “own” positions in one school but teach in another school is de minimis. The total was 14 for 2010-11 (or 1.5% of 920 teachers) and four in 2009-10 (or .4% of 909 teachers).

Second, teachers who “own” one position but teach in another school do so only for one-year assignments, typically at the request of the principal in the receiving school. The understanding among all parties, including the teacher who covers the “owned” position, is that the teacher on assignment will

return to his or her “owned” position at the end of the school year. Thus, any disruption caused by a teacher’s return to an “owned” position is based on faulty expectations. This is particularly true with regard to new teachers, who only attain professional status (and the resulting seniority) after they have taught for three consecutive years in the school system. For their first three years in the school system, new teachers cannot have any expectation that they will retain the same position from year to year.

Finally, the district’s review of its records revealed that in the past two years, the only time a teacher returned to an “owned” position during the middle of the school year was when that teacher had been out of school entirely for personal reasons (e.g., on personal, medical, or maternity leave). Thus, the implied phenomenon of teachers transferring from one school back to an “owned” position in another school in the middle of the school year simply does not exist.

Seniority: New Bedford believes that the seniority provisions in the teachers’ contract are typical of those in school districts in Massachusetts, but the district would consider any alternative language suggested by DESE. In fact, the city in good faith asked DESE to provide specific suggestions on seniority and other contractual provisions that DESE believes are not conducive to providing New Bedford students with a quality education, but DESE merely directed the city to a contract database on DESE’s website. This was a supremely unhelpful gesture and would require the city to wade through hundreds of contracts. A search of the term “seniority,” for example, yielded 315 documents. Given DESE’s expertise and the opinions in its Report, it should have been able to provide New Bedford with concrete ideas about how the city might modify the contract in accordance with DESE’s recommendations, if any.

Professional Development: New Bedford’s new initiatives with RBT and the Efficacy Institute are important new district-wide professional development activities that are directly linked to instruction and assessment. The district agrees that there should be increased coordination of professional development activities, and the central office is currently working on a district professional development plan. The Report suggests that New Bedford create a professional development committee that is linked to a curriculum steering committee to ensure that the district’s curricular and instructional needs are given highest priority in its professional development program. The city has calculated that this recommendation would cost an additional \$28,000. The city looks forward to working with DESE to secure additional funding to implement this recommendation.

E. Student Support

New Bedford’s graduation rate in context: The Report fails to place New Bedford’s challenging graduation rate in proper context. While a majority of New Bedford’s students do graduate from high school in four years, some students take longer to complete their high school education. New Bedford is an urban education district, and its students often face a set of challenges unknown to their suburban counterparts. A majority of New Bedford’s students are from households with incomes that place them below the poverty line. Many are from single-parent families. Others speak English as a Second Language or require special education services. Therefore, as in many other urban communities across the country, a portion of New Bedford’s students must pursue their education under difficult circumstances that can necessitate extra time for completion.

This is certainly not unique to New Bedford, and not limited within the field of education to high school completion. Only 40% of all college students nationally complete their programs within the traditional four years; over 30% take five years, and an additional 20% take six years.ⁱ With this in mind, it is unreasonable to expect that all students in urban areas will be able to follow the same traditional four-year cookie-cutter model for high school graduation that works in the suburbs. A comparison of an urban district to a suburban district cannot offer relevant insight into school system performance because the circumstances of the student populations are so markedly different.

The Report indicates that New Bedford has a four-year graduation rate of only 53.5%. As explained above, this four-year measure does not provide an accurate view of the number of New Bedford students who complete a high school program. To offer more accurate insight into the real graduation rate in New Bedford, the district believes that it is more appropriate to examine the DESE's five-year adjusted cohort graduation rate, with the understanding that some students will take an additional year to graduate.

A comparison of the four-year graduation rate of 53.5% for 2010 to the five-year adjusted cohort graduation rate of 63.8% for 2009 (2010 is not available) displays the significantly different graduation results that emerge through the adjustment of a basic metric. When the metric used includes this one additional year, the graduation rate increases over 10%. This also holds true for the five-year adjusted cohorts of 2008 and 2007 in New Bedford.ⁱⁱ The graduation rate would continue to increase if students who took two or more additional years to complete their high school program were included in an expanded cohort calculation. However, DESE does not track this data.

Moreover, although the five-year adjusted cohort is the more appropriate metric, the graduation rate alone does not tell the whole story. There are 88 students who were not included in the five-year adjusted cohort graduation rate of 63.8% for 2009, but who did not drop out. Of these 88 students, 22 (3.6%) received their GED, 28 (4.5%) remained in school to pursue high school graduation, and 38 (6.1%) met all district graduation requirements but were relegated to dropout status because they could not pass the state-mandated MCAS exam. The 22 students who received their GED, though not included in the district's graduation rate, are fully credentialed to pursue further education, training, or other opportunities. The 28 students who remained in school pursuing their diplomas are to be commended for their tenacity and have the full potential to succeed in their pursuit of high school graduation. And the 38 students who met all local standards for graduation but could not pass the MCAS exam and finished high school without a diploma are the human faces of an educational system that far too often fails its young people by imposing mandates without the funding necessary to meet them.

The following table offers some troubling insight into the educational, socioeconomic, and demographic composition of this group of 38 students, who are labeled “Non-Grad Completers” by DESE, but are known in private and parochial school settings as high school graduates:

**New Bedford: Analysis of Non-Graduate Completers
Five-year adjusted cohort for 2009**

Student group	Number in cohort	Percentage of cohort	Distribution of 38 non-grad completers	Percentage non-grad completers in student group
Male	329	53.1	23	60.5
Female	290	46.8	15	39.4
Limited English Proficiency	23	3.7	2	5.2
Special Education	118	19.0	21	55.2
Low Income	454	73.3	36	94.7
Black or African American	87	14.0	4	10.5
Asian	8	1.2	1	2.6
Hispanic	114	18.4	15	39.4
American Indian or Alaska Native	0	-	-	-
Native Hawaiian or Pacific Islander	2	-	-	-
Multi-race, Non-Hispanic	47	7.5	2	5.2
White	361	58.3	16	42.1
Non-White	258	41.7	22	57.8

Students who completed all district high school graduation requirements but left high school without diplomas because they were unable to pass the MCAS test are disproportionately low-income (comprising 94.7% of the group of 38, but 73.3% of the total cohort), disproportionately special education students (comprising 55.2% of the group of 38, but only 19.0% of the total cohort), and disproportionately non-white (comprising 57.8% of the group of 38, but 41.7% of the total cohort). The state should provide additional resources to these students, who have demonstrated a clear commitment to their education by staying in school and meeting all local requirements, but have experienced difficulty on a high-stakes exam.

Further, an examination of the 2009 five-year adjusted cohort dropout rate of 21.9%, or 136 students, reveals the same pattern of disturbing socioeconomic data. The following chart illuminates the dropout figureⁱⁱⁱ:

**New Bedford: Analysis of Students Who Dropped Out
Five-year adjusted cohort for 2009**

Student group	Number in cohort	Percentage of cohort	Distribution of 136 students who dropped out	Percentage distribution of 136 students who dropped out	Percentage of student group that dropped out
Male	329	53.1	93	68.3	28.2
Female	290	46.8	43	31.6	14.8
Limited English Proficiency	23	3.7	5	3.6	21.7
Special Education	118	19.0	45	33.0	38.1
Low Income	454	73.3	130	95.5	28.6
Black or African American	87	14.0	15	11.0	17.2
Asian	8	1.2	1	-	12.5
Hispanic	114	18.4	32	23.5	28.1
American Indian/Alaska Native	0	-	-	-	-
Native Hawaiian/Pacific Islander	2	-	-	-	-
Multi-race, Non-Hispanic	47	7.5	11	8.0	23.4
White	361	58.3	77	56.6	21.3
Non-White	258	41.7	59	43.3	22.8

The dropout problem has the greatest disproportionate impact on low-income students, who comprise 73.3% of the cohort but 95.5% of the students who drop out of school. There is a similar imbalance for special education students, who comprise 19% of the cohort but 33.0% of the dropout group. It is clear that these two vulnerable groups need greater educational services than do their peers who are not facing the same challenges. This is true not just in New Bedford, but also in other cities in Massachusetts and across the country.

In fact, an examination of the socioeconomics behind the 2009 five-year adjusted cohort dropout rates in all Gateway Cities reveals similar disparities:

**Gateway Cities: Analysis of Students Who Dropped Out
Five-year adjusted cohort for 2009**

City	Dropout Rate %	Low-income: percentage of total cohort	Low-income: percentage of dropouts	Special education: percentage of total cohort	Special education: percentage of dropouts
Brockton	15.6	79.7	93.0	14.0	24.9
Fall River	22.0	70.0	80.3	13.9	19.5
Fitchburg	12.5	63.0	94.8	19.4	28.0
Haverhill	17.4	50.4	77.6	22.5	34.1
Holyoke*	28.9	80.2	95.9	24.4	37.9
Lawrence**	29.1	94.5	95.4	18.4	27.7
Lowell***	11.6	78.2	93.6	11.2	28.4
New Bedford	21.6	73.3	95.5	19.0	33.0
Pittsfield	11.1	45.9	83.3	18.8	46.3
Springfield	26.0	88.4	95.3	27.5	40.8
Worcester	13.4	80.7	92.1	24.8	44.5

*Excludes Holyoke Community Charter

**Excludes Lawrence Family Development Charter

***Excludes Lowell Community Charter Public and Lowell Middlesex Academy Charter

In Massachusetts, the challenges faced by the New Bedford Public School system are not unique but are also faced by every other Gateway City. In each of these cities, students from low-income families face a markedly increased risk of a poor educational outcome than that of their higher-income peers.

In 2011, New Bedford, along with urban districts across the state and country, is clearly operating under a new paradigm, though DESE remains focused on the old. The district is producing solid results given the constraints it faces. Many New Bedford students who are unable to graduate high school within four years continue to pursue their high school diplomas or GEDs through alternative pathways, and the district offers several programs to meet the diverse needs of these students. As the Report correctly notes, such programs include the New Bedford Evening Extension Program, the Twilight Program, and the Parenting Teens Program. These programs are well-utilized and enjoy significant success; for example, the New Bedford High School Evening Extension Program has issued diplomas to 480 students since 2006 and 102 certificates to students who successfully completed the program but were unable to pass the MCAS exam. Moreover, the future is bright for graduating seniors. Over the past six years, an average of 77.7% of New Bedford high school seniors every year planned to attend college. In a city where only 14% of residents have a college degree, this percentage is profoundly positive for the future of New Bedford.

Strategic efforts to decrease the dropout rate: Although New Bedford is graduating a greater percentage of students than the Report implies, the district believes that a dropout rate of 21.9% is unacceptable. Consistent with the Report’s recommendations, the district’s Office for Student Services has already worked throughout the 2010-11 school year to identify the key factors placing New Bedford

youth at risk for dropping out of school. Data from school climate surveys, focus groups, and interviews with school students, school staff and parents have identified the following factors as most relevant: lack of parent involvement and lack of high expectations; poverty; racial/ethnic groups; mental health issues; multiple school placements; peer pressure; court involvement; foster care history; parent dropout history; and lack of relationships with school staff.

Many of the district's existing programs address these risk factors, but to recapture even more young people and further reduce the dropout rate, the district needs more funding to provide increasingly customized services for students at risk of leaving high school without diplomas. The district estimates that the additional cost to provide optimal student support would be approximately \$350,000. This would be money well spent, however, given that the per-student investment to keep a student in school and on the path to graduation pales in comparison to the costs that society will pay if the student leaves school without a diploma. Recent estimates indicate that each dropout costs society approximately \$300,000 in social support and lower tax revenue contributions over the course of his or her lifetime.^{iv}

While increased student support efforts are necessary to reduce the dropout rate, they will not be sufficient. As described above, the overwhelming majority of dropouts are students from low-income families. Many of these students do not live in safe, quiet neighborhoods, nor do they likely have regular access to nutritious food. These are but two aspects of how, as Governor Patrick stated in his February 2011 speech to leaders of the state's Gateway Cities, "*poverty is the problem*" in urban education. To increase academic achievement, the nation as a whole must recommit to the notion that public education is a collective responsibility, and it must adopt policies that support all families in their daily lives, not just inside the school walls.

A word about the MCAS: A critical part of any discussion about the graduation and dropout rates in New Bedford or any other Massachusetts city or town is the MCAS requirement. From 2003 to 2010, an estimated 25,000 Massachusetts public high school students finished high school without receiving a diploma, only because they did not pass the MCAS test. These students are all labeled "dropouts," despite their having stayed in school, passed their classes, and participated fully in extracurricular activities. And while there are no firm statistics, it is undeniable that an additional portion of the high school dropout rate is attributable to students who left school because they feared they could not pass the MCAS and/or found the countless hours of MCAS preparation to be mind numbing. DESE recommends that New Bedford analyze "whether and to what extent classroom instruction is a factor in the lack of student engagement in school," but New Bedford already knows that one reason for any disengagement is the necessity of extreme focus on MCAS preparation.

Depriving students of high school diplomas solely because of MCAS failure is inequitable and is creating an educational caste system. Private and parochial schools are exempt from the MCAS. Their students, who number well over 100,000, receive high school diplomas regardless of whether they could have passed the MCAS. Further, colleges and universities, whether public or private, do not consider MCAS scores when they evaluate candidates for admission. Thus, private school students, parochial school students, and out-of-state students who could not pass or do not take the MCAS could gain admission to a Massachusetts public or private college or university, while a Massachusetts public school student who achieved everything that the others have but did not pass the MCAS, cannot.

The MCAS requirement for high school diplomas is also bad economic and social policy. The students who do not receive high school diplomas because they did not pass the MCAS are relegated to the same class of wage earners as those who have chosen to drop out of high school. Without high school diplomas, it is highly difficult for these students to find jobs paying living wages, which in turn reduces the taxes they pay for services and increases their reliance on public assistance. Further, because minority and low income students fail the MCAS at higher rates than their peers, the MCAS requirement is perpetuating and exacerbating racial, ethnic, and socioeconomic disparities.

There is an equitable and just solution to the grave problems caused by the MCAS requirement, and that is to create a bifurcated system of public high school diplomas: an MCAS high school diploma, certifying that a student has passed the MCAS exam, and an accredited high school diploma. Such a system already exists in other states and works well. This system will not likely ameliorate the stultification caused by excessive standardized test preparation, but it will at least enable students who have passed all of their classes to go forward into the world as high school graduates. Such a change in policy must be retroactive to enable the 25,000 students who fall into the “Non-Grad Completer” category to fully join society.

Puzzling critiques of retention and suspension rates: Finally, the district is puzzled by the Report’s contradictory criticism of its high school retention and suspension rates. The retention rates reflect in large part an effort to ensure that students are promoted only if they can do the work for the next grade level. The reviewers might legitimately criticize the fact that too many students are not ready for the next grade, but it seems odd to criticize teachers for not promoting students who cannot perform.

The Report also criticizes the high school’s suspension rates, but suspensions are designed in part to maintain order in the classroom, and the Report itself notes that the high school classrooms the reviewers observed were unruly. It seems unlikely that the reviewers would want teachers to keep misbehaving students in the classroom, given that the Report itself notes that the instructional pace in one high school classroom was slowed because of a student who repeatedly misbehaved. Further, because classroom behavior is significantly influenced by factors outside the classroom, schools should not be disproportionately criticized for having to impose suspensions.

F. Financial and Asset Management

Budgets based on student achievement: The reviewers’ assertion that overall budgets are not based “on needs as reflected in student achievement or other data” itself lacks so little support as to be meaningless conjecture. The reviewers do not cite a single instance of a specific expenditure or allocation that is not based on the goal of student achievement. Indeed, during the review process, the reviewers made little effort to understand New Bedford’s rationales for specific budgetary decisions. For example, as noted earlier, when the superintendent tried to engage them in a discussion of why New Bedford had prioritized maintaining small class size over coaches, they were dismissive and uninterested. Had the reviewers looked harder, they would have discovered a host of budgetary decisions that were aimed at increasing student achievement and classroom services, such as difficult reductions in custodians, clerks, maintenance staff, cafeteria workers and bus drivers, as well as general expenses, all to preserve teaching positions.

Principals' input on budgets: The Report's assertion that principals do not have input into budgets is incorrect. The district supplied DESE with multiple documents showing principals making detailed requests based on instructional needs, including requests for additional staff and materials, and budgets are frequently modified based on principals' input.

Moreover, the statement that the collective bargaining agreement does not permit principals to deny teacher resource requests is without any credible basis, both as a matter of law and as a matter of fact. The provision cited in the Report, Article 6, F, uses the word "shall" when referring to requests being reduced to writing and the word "will" when referring to principals referring requests to the Business Manager. The word "shall" is an imperative and indicates that requests must always be in writing. The word "will" is not an imperative and implies that principals will forward requests to the Business Manager if they approve them. The contract drafters clearly knew the import of the word "shall," and they deliberately chose not to use it when discussing principals' forwarding requests to the Business Manager.

Financial plan and unified accounting system: The district agrees that it would be beneficial to develop a five-year financial plan and to combine the city and school fiscal management systems. The district has calculated that these two recommendations would cost approximately an additional \$1,893,100. The costs break down as follows: (1) \$50,000 for the development of a five-year financial plan; (2) \$60,000 for a staff accountant/budget analyst; and (3) \$1,738,100 for a fiscal management system (MUNIS). The city looks forward to working with DESE to secure additional funding to implement these recommendations.

III. The Cost of the Recommendations

Like many other urban school districts in the United States, the New Bedford public school system faces severe financial constraints. As the table below illustrates, the proposed funding sources available for the fiscal year 2012 school budget total \$110,297,593, which is \$5,570,221 less than the funding sources available for fiscal year 2011.

Funding Source	FY 09	FY 10	FY 11	FY 12
Education Jobs Grant			\$6,333,076	\$598,157
ARRA – IDEA Funds			\$2,204,499	\$0
ARRA – Title I Funds			\$2,011,086	\$0
SFSF Federal Grant	\$11,668,556	\$3,711,918	\$569,719	\$0
Chapter 70	\$99,286,975	\$108,736,420	\$106,123,637	\$111,804,538
Chapter 71	\$2,017,432	\$1,942,300	\$1,809,411	\$1,422,863
E-Rate	\$332,286	\$354,120	\$48,339	\$177,213
Miscellaneous	\$145,200	\$484,250	\$202,250	\$202,250
Transfers from School Lunch to cover costs budgeted in local	\$750,000	\$750,000	\$750,000	\$750,000
Sub-Total	\$114,200,449	\$115,979,008	\$120,052,017	\$114,955,021
Less: Charter School Assessment, net	\$1,772,957	\$2,468,147	\$4,184,203	\$4,657,428
Total	\$112,427,492	\$113,510,861	\$115,867,814	\$110,297,593
\$ Increase (decrease)		\$1,083,369	\$2,356,953	\$(5,570,221)

Note that a full \$4,657,428 that otherwise would have been available to the district was instead allocated to the city's net charter school assessment. The city's charter school receives \$3,400 more per pupil than does the New Bedford Public School system, despite the fact that students attending the charter school might be more likely to have families who are actively involved in their education and have less need for student support services.

Given these financial difficulties, New Bedford does not have the funding to implement all of the Report's recommendations. The table on the next page lists those recommendations that the city is adopting or wishes to adopt, along with their costs. The two columns on the left list those recommendations that the district had decided to implement on its own, even prior to the Report's issuance. The costs of those recommendations are already included in the proposed fiscal year 2012 budget, which is currently under review. The column on the far right, titled "Estimated Additional Costs Pursuant to DESE Recommendations," lists those recommendations that the district wishes to adopt, but for which it needs additional funding. The total additional funding needed for all of the recommendations in this latter category is: \$11,372,685.

	<u>Costs included In Superintendent Proposed FY12 Budget</u>	<u>Costs included in Proposed FY12 Title IIA Budget</u>	<u>Estimated Additional Costs Pursuant to DESE Recommendations</u>
<u>Leadership/Governance</u>			
<i>Assistant Superintendent for Accountability and School Improvement</i>	\$110,000		
<u>Curriculum/Instruction</u>			
<i>Administrator of Curriculum and Instruction</i>	\$87,000		
<i>Additional planning and curriculum time</i>			\$1,536,585
<i>ELA Supervisor K-8</i>			\$80,000
<i>Math Supervisor K-8</i>		\$80,000	
<i>Instructional coaching model</i>			\$3,080,000
<u>Assessment</u>			
<i>District Wide Coordinator of Research, Testing and Assessment</i>			\$80,000
<i>Data teams</i>			\$2,765,000
<i>Data Analyst</i>			\$60,000
<u>Professional Development</u>			
<i>District Wide Coordinator of Professional Development</i>		\$86,000	
<i>Professional development curriculum planning committee [stipends]</i>		\$42,000	\$28,000
<i>Additional Professional Development</i>		\$800,000	
<u>Student Support</u>			
<i>Closing the achievement gap & extending after school programs</i>			\$350,000
<u>Financial and Asset Management</u>			
<i>Development of a five year financial plan</i>			\$50,000
<i>Staff Accountant/Budget Analyst</i>			\$60,000
<i>Fiscal management systems (MUNIS)</i>			\$1,783,100
<u>Overall</u>			
<i>Fringe benefits for new hires</i>			\$1,500,000
Total Additional Funding Needed to Implement DESE Recommendations	\$197,000	\$1,008,000	\$11,372,685

New Bedford looks forward to setting up public meetings with DESE to begin the implementation of DESE's recommendations, establishing a supplemental budget, and securing the funding necessary to carry out the recommendations.

Respectfully submitted:



Mayor Scott W. Lang
June 10, 2011

ⁱ U.S. Department of Education, National Center for Education Statistics, Beginning Postsecondary Students: 2009 Database. Computed by N.C.E.S. QuickStats, May 17, 2011.

ⁱⁱ The dropout rate for the 2008 five-year adjusted cohort was 23.8%, or 168 students. The dropout rate for the 2007 five-year adjusted cohort was 18.5%, or 132 students.

ⁱⁱⁱ Massachusetts Department of Elementary and Secondary Education, Massachusetts School and District Profiles: New Bedford, Cohort 2010 Graduation Rates.

http://profiles.doe.mass.edu/grad/grad_report.aspx?orgcode=02010000&orgtypecode=5&

^{iv} Northeastern University Center for Labor Market Studies, The Consequences of Dropping Out of High School, Boston, Massachusetts, October 2009

http://www.clms.neu.edu/publication/documents/The_Consequences_of_Dropping_Out_of_High_School.pdf