



City of New York

OFFICE OF THE COMPTROLLER

John C. Liu
COMPTROLLER



MANAGEMENT AUDIT

Tina Kim

Deputy Comptroller for Audit

Audit Report on the New York City
Department of Education's
High School Application Process for
Screened Programs

MH12-053A

June 13, 2013

<http://comptroller.nyc.gov>



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

John C. Liu
COMPTROLLER

June 13, 2013

To the Residents of the City of New York:

My office has audited the adequacy of the Department of Education's (DOE) controls to ensure an accurate screening and ranking of student applicants in the high school placement process. We audit City processes such as this to ensure the fair and consistent application of stated policies and procedures.

The audit found that DOE lacks adequate controls over the high school application process to ensure an accurate screening and ranking of the students who apply for admission to a screened program. Weaknesses include: the lack of formal written procedures delineating the criteria and steps used by the high schools to rank the students; a failure to maintain sufficient records to document the ranking processes undertaken; and the lack of oversight by DOE to ensure the fair and consistent application of each school's ranking procedures. As a result of these weaknesses, there is limited assurance that the possibility of inappropriate manipulation of student rankings, favoritism, or fraud is being adequately controlled.

The audit made nine recommendations, including that DOE should: require the high schools with screened programs to document their ranking rubrics and processes and submit such documentation to a unit within DOE; review the submitted ranking criteria and periodically evaluate the ranking practices of a sample of screened programs to ensure that the high schools are appropriately ranking students in accordance with their stated criteria; and review the ranking practices of the four screened programs cited in the report for having a considerable number of questionable student rankings and ensure that they are following their stated screens and priorities and DOE's student selection policy for screened programs.

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read "JCL".

John C. Liu

TABLE OF CONTENTS

AUDIT REPORT IN BRIEF.....	1
Audit Findings and Conclusion	1
Audit Recommendations.....	2
Agency Response.....	2
INTRODUCTION.....	3
Background	3
Objective.....	4
Scope and Methodology Statement.....	4
Discussion of Audit Results	5
FINDINGS AND RECOMMENDATIONS.....	6
Most of the Sampled High Schools Are Not Ranking Students in Accordance with Stated Policy.....	7
High Schools Are Not Maintaining Sufficient Evidence to Support Their Final Rankings	8
Recommendations	9
High Schools Are Not Required to Formally Document the Criteria Used for Their Ranking Process.....	9
Recommendations	10
Middle Schools Not Maintaining High School Application Forms	11
Recommendation	11
Questionable Ranking Practices at Four of Five High Schools.....	12
Hostos-Lincoln Academy of Science Did Not Adhere to Its Stated Ranking Process	12
Baruch College Campus High School Did Not Adhere to Its Stated Ranking Process	13
Midwood High School Did Not Adhere to Its Stated Ranking Process	14
Tottenville High School Did Not Adhere to Its Stated Ranking Process	15
Townsend Harris High School Generally Adhered to Its Stated Ranking Process	15
Recommendations	16
DETAILED SCOPE AND METHODOLOGY	17

APPENDIX

ADDENDUM

THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER MANAGEMENT AUDIT

Audit Report on the New York City Department of Education's High School Application Process for Screened Programs

MH12-053A

AUDIT REPORT IN BRIEF

The New York City Department of Education (DOE) has two different high school placement processes. The first process, referred to as the high school application process, is for eighth grade students applying for the ninth grade and first-time ninth graders applying for the tenth grade. There are seven different admissions methods that high school officials use to consider students for their programs: (1) test, (2) audition, (3) educational option, (4) limited unscreened, (5) screened, (6) unscreened, and (7) zoned. (For a description of the admissions methods, see the Appendix.) The second process, referred to as the over-the-counter process, is for (1) new students, (2) students returning to New York City public schools, and (3) New York City public high school students transferring between high schools.

According to records obtained from DOE, there were 284,513 high school students on register as of October 31, 2011. Of these, 215,556 students were placed through the high school application process and were still enrolled at the same high schools as of that date. The remaining 68,957 students were placed in their respective high schools through the over-the-counter process.

This audit determined whether DOE has adequate controls in place to ensure an accurate screening and ranking of students in the high school placement process. This audit concentrated on the high school application process for eighth grade students applying for ninth grade screened high school programs. We determined that the screened admission selection method posed the greatest risk of potential manipulation and accordingly concentrated our audit efforts in this area.

Audit Findings and Conclusion

DOE lacks adequate controls over the high school application process to ensure an accurate screening and ranking of the students who apply for admission to a screened program. Weaknesses include the lack of formal written procedures delineating the criteria and steps used by the high schools to rank the students; failures to maintain sufficient records to document the ranking processes undertaken; and the lack of oversight by DOE to ensure the

fair and consistent application of each school's ranking procedures. We also found that DOE failed to ensure that middle schools retained the original, hard-copy application forms documenting students' high school choices, which prevented us from determining whether the high school choice data in DOE's Student Enrollment Management System (SEMS) was accurate.

As a result of these weaknesses, we do not have reasonable assurance that the possibility of inappropriate manipulation of the student rankings, favoritism, or fraud is being adequately controlled. Our analysis of the ranking process for our sample of five screened programs found that 319 (8 percent) of the 4,075 students ranked by these schools did not appear to meet the selection and enrollment criteria (screen). Of these 319 students, 92 (29 percent) were eventually matched by SEMS to those screened programs and 60 (19 percent) were reportedly enrolled at those schools as of October 31, 2011. Conversely, we found that 1,946 (34 percent) of the 5,702 students who we determined did meet the screens for these programs were not ranked by the schools. DOE does not require the schools to rank every student who meets the screen. Nevertheless, many of the students who appear to have met the screen but were not ranked had higher scores than some of the students who appear to have met the screen and were ranked. By not ranking such students, the schools denied them an opportunity to be matched to these programs.

Audit Recommendations

Based on our findings, we make nine recommendations, four of which are listed below. DOE should:

- Ensure that the high schools comply with the New York State Education Department's *Records Retention and Disposition Schedule ED-1* rule. Specifically, it should ensure that the high schools are made aware of the retention requirement and retain the high school ranking documentation for a minimum of six years as required.
- Require the high schools with screened programs to document their ranking rubrics and processes and submit such documentation to a unit within DOE.
- Review the submitted ranking criteria and periodically evaluate the ranking practices of a sample of screened programs, especially those with high demand, to ensure that the high schools are appropriately ranking students in accordance with their stated criteria.
- Review the ranking practices of the four high school screened programs cited in this report for having a considerable number of questionable student rankings and ensure that the schools are following their stated screens and priorities and DOE's student selection policy for screened programs.

Agency Response

In its response, DOE generally agreed with the audit's nine recommendations.

INTRODUCTION

Background

DOE provides primary and secondary education to over 1 million pre-kindergarten to grade 12 students in 32 school districts in over 1,500 schools. The Citywide high school placement process offers students the opportunity to apply to over 600 programs¹ in over 400 high schools.

There are two different high school placement processes. The first process, referred to as the high school application process, is for eighth grade students applying for the ninth grade and first-time ninth graders applying for the tenth grade. There are seven different admissions methods that high school officials use to consider students for their programs: (1) test, (2) audition, (3) educational option, (4) limited unscreened, (5) screened, (6) unscreened, and (7) zoned. (For a description of the admissions methods, see the Appendix.) The second process, referred to as the over-the-counter process, is for (1) new students, (2) students returning to New York City public schools, and (3) New York City public high school students transferring between high schools.

For the high school application process, students are able to apply in the fall to specialized high schools and non-specialized high school programs for the following year's admission. Students who are interested in applying to the specialized high schools can obtain from their guidance counselors a test ticket for the Specialized High Schools Admissions Test (SHSAT) and/or a ticket to audition for admission into any of the Fiorello H. LaGuardia High School of Music & Art and Performing Arts (LaGuardia High School) programs.² In order to apply to non-specialized high school programs, students are required to complete a high school application form, which allows them to apply for up to 12 programs ranked in the student's order of preference. The students submit their high school application forms to their guidance counselors, who enter the students' choices into DOE's Student Enrollment Management System (SEMS). For students who applied for audition, educational option, and screened programs, officials at the high school level rank students in order of preference. Students who apply to a screened program must meet the screen or the program's selection and enrollment criteria (e.g., final seventh grade report card grades, standardized test scores, and/or attendance and punctuality) in order to be ranked by the high schools. Based on an algorithm in SEMS, the system matches students to high school programs based on the students' choices and on the chosen high schools' ranking of the applicants. Neither the student nor the high school is aware of the other's ranking.

After SEMS completes the process of matching students to their high school program choices, it is possible that a student can receive multiple offers from schools. For example, a student may receive offers from: (1) one of the specialized high schools that the student ranked when taking the SHSAT; (2) each of the LaGuardia High School programs that the student had auditioned for; and (3) one of the non-specialized high school programs listed on the high school application.³

¹ A high school program has a curriculum in a particular interest area (e.g., Health Professions). High schools can have one or more programs.

² All eighth and first-time ninth grade students who are City residents are eligible to obtain a ticket to take the SHSAT and/or to audition for LaGuardia High School.

³ Students can get one offer from a specialized high school program and one from a non-specialized program. However, they can get multiple offers from the various programs at LaGuardia High School.

Students who did not receive any offers in the first round or who wanted to participate in the second round because they were unhappy with the selection SEMS offered are required to submit their round two high school application forms to their guidance counselors, who then enter the students' choices into SEMS. SEMS attempts to match these students to the high school programs listed on their second round application forms. For those students SEMS is not able to match in the second round, the High School Team from DOE's Office of Student Enrollment manually matches them to high school programs. At this point, all students should have been matched to a high school program. Students may still appeal their placement; if so, an Appeals Committee from DOE's Office of Student Enrollment will review the appeal.

For the over-the-counter process, students are required to register for a high school program at any one of DOE's Borough Enrollment Offices located throughout the five boroughs. The staff at the Borough Enrollment Office determines whether the student was already placed at a high school. If the student does have a high school placement, then the staff will determine whether there was a change in the student's circumstances (e.g., a medical, safety, or travel hardship) that warrants granting a transfer to another high school. If the student does not have a high school placement, then the staff at the Borough Enrollment Office reviews the new or returning student's application, determines their interests and abilities, and searches for programs with available seats. At that point, the staff may register the student directly into a school or refer the student to a school for consideration.

According to records obtained from DOE, there were 284,513 high school students on register as of October 31, 2011. Of these, 215,556 students were placed through the high school application process and were still enrolled at the same high schools as of that date. The remaining 68,957 students were placed in their respective high schools through the over-the-counter process. We determined that the screened admission selection method posed the greatest risk of potential manipulation and accordingly concentrated our audit efforts in this area.

Objective

The objective of this audit was to determine the adequacy of controls in place to ensure an accurate screening and ranking of students in the high school placement process. This audit concentrated on the high school application process for eighth grade students applying for ninth grade screened high school programs.

Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective, except for the lack of sufficient, appropriate evidence to determine whether the high school choice data in SEMS was accurate. This issue is further disclosed in the subsequent paragraph. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

In order to perform an accuracy test on the high school choice data in SEMS, we sorted the data by admission code and found that as of October 31, 2011, 215,556 students had been placed through the high school application process and were still enrolled in the same high

school, and 68,957 students had been placed through the over-the-counter process. Due to DOE's record retention policies requiring that schools retain documents a minimum of six years, we included only students placed through the high school application process during the period from July 1, 2007, through October 31, 2011. We randomly selected 150 students from this population of 214,905 students. We then requested the original, hard-copy high school application forms for the 150 students in our sample and obtained access to the SEMS archives for the 2009-2010, 2010-2011, and 2011-2012 school years. Our intent was to determine whether the high school choice data in SEMS matched the high school choices listed on the students' original, hard-copy high school application forms. However, DOE was only able to provide the original, hard-copy high school application forms for 14 of the 150 students, which was insufficient for us to draw conclusions. Therefore, we cannot be reasonably assured that the high school choice data in SEMS was accurate.

The scope of this audit covers the period from July 2009 to June 2012. Please refer to the Detailed Scope and Methodology at the end of this report for the specific procedures and tests that were conducted.

Discussion of Audit Results

The matters covered in this report were discussed with DOE officials during and at the conclusion of this audit. A preliminary draft report was sent to DOE officials and discussed at an exit conference held on May 10, 2013. On May 16, 2013, we submitted a draft report to DOE officials with a request for comments. We received a written response from DOE officials on May 31, 2013. In their response, DOE officials generally agreed with the audit's nine recommendations. DOE stated, "We know that we still have more work to do. We thank the Comptroller's office for raising a number of important concerns and for making recommendations about how we can continue to improve the high school admissions process for students and their families."

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

FINDINGS AND RECOMMENDATIONS

DOE lacks adequate controls over the high school application process to ensure an accurate screening and ranking of the students who apply for admission to a screened program. Weaknesses include the lack of formal written procedures delineating the criteria and steps used by the high schools to rank the students; failures to maintain sufficient records to document the ranking processes undertaken; and the lack of oversight by DOE to ensure the fair and consistent application of each school's ranking procedures. We also found that DOE failed to ensure that middle schools retained the original, hard-copy application forms documenting students' high school choices, which prevented us from determining whether the high school choice data in SEMS was accurate.

Specifically, we found:

- The high schools in our sample do not maintain sufficient supporting documentation to justify their rankings of the students who applied to their screened programs as required by the New York State (NYS) Education Department's policy. This severely limits DOE or independent monitors from evaluating whether the high schools were adequately following their own criteria when ranking eligible students.
- The high schools are not required to submit written descriptions of their ranking criteria and procedures, including the rubrics they use for their student ranking processes (e.g., the weights assigned to grades, standardized test scores, attendance, etc.), to an oversight unit at DOE. This severely limits DOE or independent monitors from evaluating the fairness of the ranking system used or from determining whether the criteria, rubrics, and procedures used are reasonable.
- DOE does not monitor or audit the student rankings performed at the high school level. There is no unit within DOE that methodologically monitors or audits the high schools' ranking results. Without an effective monitoring system, questionable ranking practices could continue to go undetected.
- The middle schools generally are not maintaining the high school applications as required by Chancellor's Regulation A-820. Of the original, hard-copy application forms that we had requested for 150 students, only 14 (9 percent) were available. Because of the insufficient number of applications available for review, we have limited assurance that the guidance counselors accurately entered the students' choices into SEMS.

As a result of the weaknesses cited above, we do not have reasonable assurance that the possibility of inappropriate manipulation of the student rankings, favoritism, or fraud is being adequately controlled. Our analysis of the ranking process for our sample of five screened programs found that 319 (8 percent) of the 4,075 students ranked by these schools did not appear to meet the selection and enrollment criteria (screen). Of these 319 students, 92 (29 percent) were eventually matched by SEMS to those screened programs and 60 (19 percent) were reportedly enrolled at those schools as of October 31, 2011. Conversely, we found that 1,946 (34 percent) of the 5,702 students who we determined did meet the screens for these programs were not ranked by the schools. DOE does not require the schools to rank every student who meets the screen. Nevertheless, many of the students who appear to have met the screen but were not ranked had higher scores than some of the students who appear to have met the screen and were ranked. By not ranking such students, the schools denied them an opportunity to be matched to these programs.

These matters are discussed in greater detail below.

Most of the Sampled High Schools Are Not Ranking Students in Accordance with Stated Policy

Our review found a considerable number of questionable student rankings at four of the five high school screened programs that we sampled. These high schools ranked students who, based on the results of our analysis, did not appear to have met the entire screen or admissions priorities⁴ as defined by the schools, while passing over some students who appeared to have met the screen. Table I provides a summary of the number of students who were inappropriately ranked or not ranked at all by each of the five high schools.

Table I
Breakdown of Rankings of Students by the High Schools
for the Five Screened Programs in Our Sample

Name of High School	Available Seat Target	Total Number of Applicants	Total Number of Students			
			Ranked by the High School		Not Ranked by the High School	
			Who Appeared to Have Met the Screen	Who Did not Appear to Have Met the Screen or Priority**	Who Did not Appear to Have Met the Screen or Priority**	Who Appeared to Have Met the Screen
Hostos-Lincoln Academy of Science (Bronx)	81	2,643*	157	24	1,659	803
Baruch College Campus High School (Manhattan)	109	7,712	237	8	6,495	972
Midwood High School, Medical Science Institute (Brooklyn)	300	4,720	1,616	284	2,727	93
Tottenville High School, Science Institute (Staten Island)	68	952	355	3	520	74
Townsend Harris High School, Intensive Academic Humanities (Queens)	270	5,288	1,391	0	3,893	4
Total	828	21,315	3,756	319	15,294	1,946

* Of the 2,643 students who applied to Hostos's program, 2,567 were non-Hostos students and 76 were continuing eighth graders at Hostos. All continuing eighth graders who want to attend Hostos are guaranteed a seat. If all 76 continuing eighth grade students were matched to the program, then only five seats would have been available for all of the non-Hostos students applying to the program.

** While the schools set the priority standards, SEMS assigns the student priority numbers using the algorithms integrated into the system based on the schools' priority standards. Baruch College Campus High School and Tottenville High School have high demand programs with many more student applicants coded priority 1 than available seats. As a result, we did not test students in other priority groups to determine whether they met the screen. For Midwood and Townsend Harris, SEMS assigns priority 1 to all City residents. There are no additional priority categories for these two schools.

As illustrated in Table I, the high schools ranked 319 students who did not appear to have met the screens while at the same time opting not to rank 1,946 (34 percent) of the 5,702 students who appeared to have met the screen. In addition, many of these 1,946 students had higher scores than some of the 3,756 students who met the screen and were ranked. By not ranking

⁴ The admissions priorities section in DOE's *Directory of the New York City Public High Schools* lists the order in which the school will consider applicants. This might include restrictions or priorities based on where the applicants live, where they attend school, or whether they are Limited English Proficiency students who have recently arrived in this country.

the 1,946 students, schools might have denied these students the opportunity to be matched to the program of their choice. Of the 319 students who did not appear to meet the screen but were nonetheless ranked by the schools, 92 (29 percent) were eventually matched to the school program to which they applied and 60 (19 percent) were reportedly enrolled at the school as of October 31, 2011. In the absence of reasonable controls to monitor the ranking process performed at schools, there is a significant risk that the ranking process will not be carried out in a fair and consistent manner. Specifically, high school applicants who do not meet the screen will be improperly placed into a program while applicants who do meet the screen will be improperly denied that same opportunity.

High Schools Are Not Maintaining Sufficient Evidence to Support Their Final Rankings

The five high schools whose ranking processes we reviewed are not maintaining sufficient documentary evidence of their analyses to support the rankings of the students who applied to their screened programs. New York State Education Department's *Records Retention and Disposition Schedule ED-1* requires schools to maintain for a minimum of six years any documentation they have regarding the rankings of the students applying to their programs.

For example, schools may download the Program Candidate Lists (PCL) from SEMS into an Excel spreadsheet.⁵ The PCL contains a listing of all the applicants who have applied to the school's program and includes detailed personal information and the scholastic history of each applicant, including grades, test scores, latenesses, absenteeism rates, etc. The schools generally apply formulas based on their screening criteria to the data contained in the PCL spreadsheet to generate the student rankings. One school used filters instead of formulas to identify students who met their criteria. Another school randomly selected students. The applicants who meet the screen receive numeric rankings; the schools then upload the information into SEMS. SEMS matches students to high school programs based on the students' preferences entered on their high school application forms and the schools' rankings of the applicants.

Our review of the ranking process performed by the five schools revealed that the schools were not maintaining adequate evidence to support their final rankings. Some schools provided Excel spreadsheets that were incomplete. For example, some of these spreadsheets did not provide the formulas applied to the PCL spreadsheets. In addition, most schools had no supporting evidence to justify the inclusion of some applicants who did not appear to have met the screen and the exclusion of others who appeared to have met the screen. Without adequate documentation, we have no assurance that the ranking of students who did not appear to meet the required screens, or the decision to not rank students who did appear to meet the screens, was appropriate. As stated previously, many of the students who were not ranked had higher scores than some of the students who were ranked. The absence of such justifications also limits DOE or independent monitors from reviewing the appropriateness, accuracy, or fairness of the schools' final rankings.

⁵ For four of the five sampled high schools, school personnel downloaded their PCLs onto Excel spreadsheets. For the remaining sampled high school, school personnel performed the calculations manually.

Recommendations

DOE should:

1. Ensure that the high schools comply with the New York State Education Department's *Records Retention and Disposition Schedule ED-1* rule. Specifically, it should ensure that the high schools are made aware of the retention requirement and retain the high school ranking documentation for a minimum of six years as required.

DOE Response: "We agree that high schools should be aware of and comply with New York State Education Department's Records Retention and Disposition Schedule ED-1."

2. Require schools to support changes to their rankings that do not adhere to their rubrics by maintaining written explanations or other supporting documentation.

DOE Response: "We agree that schools should document changes to their rankings that do not adhere to their rubrics."

High Schools Are Not Required to Formally Document the Criteria Used for Their Ranking Process

DOE does not require high schools to formally document their ranking rubrics (e.g., the weights assigned to grades, standardized test scores, attendance, etc.) or the methodology used to derive each student's rank. In our sample of five screened programs, none of the high schools maintained their ranking criteria in writing. Furthermore, there is no office or unit within DOE responsible for reviewing, monitoring, or auditing a school's ranking process or methodology. In the high school directory, DOE publishes the screen for all screened high school programs. However, it does not publish the ranking criteria or rubrics applied by the schools. The selection criteria only provide a general idea of the standards the high school will use when considering students for its program. It is the ranking criteria that provide detailed information about the standards that the school uses to rank the students.

For example, Midwood High School's (Midwood) Medical Science Institute Program has a documented selection criteria listed in the high school directory, which states that students need report card grades of 90 to 100 in their seventh grade English, math, social studies, and science classes. However, it does not state that it weighs the seventh grade math and science report card grades more than the seventh grade English and social studies report card grades, which is a component of Midwood's ranking formula.

In another example, Tottenville High School's (Tottenville) Science Institute Program has a documented selection criterion listed in the high school directory, which states that students should achieve scores of 3 or 4 on their seventh grade math and English Language Arts standardized tests. However, it does not state that it weighs the seventh grade math standardized exam score more than the seventh grade English Language Arts standardized reading exam score, which is a component of Tottenville's ranking formula.

If this information were published in the high school directory, it could affect the students' choices in both the high school programs they apply to and their orders of preference for those programs. This is especially important because SEMS matches the student to the high school

program listed highest on their high school application form and for which the student was ranked high enough by the school to be admitted.

In addition, all five screened programs in our sample indicate in the high school directory that one of their selection criteria relates to attendance and punctuality. However, the screened programs have a maximum number of instances that a student could have been absent or late during the seventh grade as part of their ranking criteria. For example, Baruch College Campus High School (Baruch) has a criterion of 10 instances unless there were extenuating circumstances (e.g., illness). Once again, this information is not published in the high school directory.

In fact, the schools had difficulties clearly explaining the criteria they used during our scope period. This complicated our efforts to recreate their applicant rankings. In order to obtain the rubric for each of the five programs, we first had to speak to the high school officials involved in the ranking process to obtain an understanding of their ranking criteria. Four of the high schools then reviewed our written summaries of their verbal explanations of their rubrics. One high school formalized their rubrics for us in writing. For two of the schools, we had to make further modifications to our rankings based on additional clarifications we received.

In order to ensure the fairness and reasonableness of the rubrics used, DOE should require each of the high schools with screened programs to formally document its ranking criteria and process and to submit it to an oversight or monitoring unit within DOE. By not requiring the schools to formalize their ranking criteria in writing, DOE's ability to evaluate the fairness of the ranking systems in place is severely limited. Furthermore, by having no office or unit within DOE monitoring or auditing the schools' ranking processes, DOE has limited assurance that the high schools are applying their ranking processes in a consistent and appropriate manner.

Recommendations

DOE should:

3. Require the high schools with screened programs to document their ranking rubrics and processes and submit such documentation to a unit within DOE.

DOE Response: "We agree that high schools with screened programs should document their ranking rubrics and processes. NYCDOE will issue guidance to schools regarding documentation and publication requirements for ranking rubrics and processes."

4. Review the submitted ranking criteria and periodically evaluate the ranking practices of a sample of screened programs, especially those with high demand, to ensure that the high schools are appropriately ranking students in accordance with their stated criteria.

DOE Response: "We agree that the NYCDOE should review the ranking practices of a sample of screened programs annually. NYCDOE will sample 6-10 PCLs each year, before the Round 1 and 2 matching processes. NYCDOE will intervene when schools are not adhering to their published criteria. If schools are adhering to the published criteria, we will review rankings relative to their documented rubrics. If schools cannot demonstrate why certain students were or were not ranked, we will require changes."

5. Consider disclosing more detailed information in its high school directory about each school's ranking criteria for its screened programs so that applicants can make a more informed decision as to which school programs they might have the best chance of being admitted.

DOE Response: "NYCDOE is committed to including more precise language to reflect school screening methodologies in the high school directory and/or through a website."

Middle Schools Not Maintaining High School Application Forms

Our review found that the middle schools generally are not maintaining the high school applications as required. DOE Chancellor's Regulation A-820, *Confidentiality and Release of Student Records, Records Retention*, states that to the greatest extent practicable, schools should retain at the school site all student records for at least 10 years after the student has graduated or has reached the age of 27, whichever is later.

In order to determine the accuracy of the information in SEMS regarding the students' high school program choices, we tried to obtain a sample of original, hard-copy high school application forms from the middle schools to compare the choices indicated on the applications to those entered by the middle school guidance counselors. We selected a random sample of 150 students who participated in the high school application process during the period of July 1, 2007, through October 31, 2011, and requested the original, hard-copy application forms. However, DOE officials provided us with original, hard-copy high school application forms for only 14 students (9 percent). In fact, of the 113 middle schools that the 150 students attended, only 12 had some of the application forms we requested.⁶ Of the remaining middle schools, some were unable to locate the forms, others were unaware of DOE's retention requirements, and still others had already shredded the forms.

Because of the low number of hard-copy applications we were able to review, we were unable to assess the reliability of the SEMS high school choice data.

Recommendation

6. DOE should ensure that the middle schools are in compliance with DOE Chancellor's Regulation A-820. Specifically, it should ensure that the middle schools are made aware of the retention requirement and retain the high school application forms as required by DOE Chancellor's Regulation A-820.

DOE Response: "We agree that high schools should be aware of and comply with NYCDOE Chancellor's Regulation A-820. . . . As part of initial communications about the opening of Applicant Submission Lists (ASL), OSE will remind schools about the need to maintain and archive any electronic or paper-based records that inform their ranking processes. OSS will provide support for middle schools to assure that student records have been properly archived. OSS will include information about Chancellor's Regulation A-820 in Principals' Weekly and School Support Weekly at the beginning and the end of each school year. OSE will remind principals and

⁶ Of the 12 middle schools that provided applications, six schools provided an application for the one student requested, two provided an application for one of the two students requested, two provided an application for one of the three students requested, and two provided applications for two of the three students requested. Some students may have submitted more than one application, one for each round.

guidance counselors about the need to maintain and archive any electronic or paper-based records that inform their ranking processes during annual training sessions. NYCDOE will consider adding language at the bottom of the high school application form stating that schools, as per [Chancellor's Regulation] A-820, are required to retain a hard copy of the student record.”

Questionable Ranking Practices at Four of Five High Schools

Our review found a considerable number of questionable student rankings at four of the five high school screened programs that we sampled. Detailed descriptions of the anomalies we identified are provided below.

Hostos-Lincoln Academy of Science Did Not Adhere to Its Stated Ranking Process

Hostos-Lincoln Academy of Science (Hostos) is a school with grades 6-12. Its continuing eighth grade students applying to its Hostos-Lincoln Academy of Science Program have priority over other students applying to Hostos. Accordingly, Hostos students are assigned priority 1 in SEMS and non-Hostos students are assigned priority 2. Hostos’s continuing eighth grade students still have to submit the high school application forms in order to be considered, but they are guaranteed a seat; they do not have to meet the selection criteria or screen to be accepted. Therefore, Hostos’s seat target will always have to be equal to (if not greater than) the number of eighth graders attending the school. On the other hand, non-Hostos students need to meet the screen to be accepted to the program. According to Hostos officials, all applicants who will be ranked should be assigned a unique ranking number (1, 2, 3, 4, etc.).

However, Hostos did not comply with its stated criteria. Students were not assigned unique ranking numbers. Our review of the 2010-2011 PCL found that Hostos ranked 98 students as number 1. This included the 76 continuing eighth grade students and 22 non-Hostos students. Additionally, Hostos ranked 82 students as number 2 and one student as number 3. (The ranking number assigned by Hostos is not to be confused with the priority code assigned in SEMS.) Of the 181 students ranked as number 1, 2, or 3, Hostos ranked 24 students who did not appear to have met the screen. In addition, Hostos opted not to rank another 803 students who appeared to have met the screen. Many of these 803 students had higher scores than some of the non-Hostos students who appeared to have met the screen and were ranked.

When we brought these matters to the attention of Hostos officials, the school principal at Hostos stated in an email that “the names of the few exceptions that fell out of the parameter of the screen [but were still ranked] could probably be attributed to expressed student-parent desire to willingly participate in the early college program.” However, Hostos provided no evidence (e.g., letters or emails from students or parents) to support this assertion. Furthermore, this does not explain why Hostos failed to rank 803 students who did appear to meet its screen. Consequently, Hostos did not give the opportunity to those 803 students to be matched to their selected program.

As shown in Table 1, the available seat target at Hostos was only 81. Accordingly, the 24 students ranked by Hostos who did not appear to meet the screen could account for as much as 30 percent of the available seat target. This significant variance from Hostos’s stated criteria leads us to question the fairness of the ranking process and whether it was conducted in accordance with the school’s stated criteria.

Baruch College Campus High School Did Not Adhere to Its Stated Ranking Process

Our review of the 2010-2011 PCL found that Baruch appears to have ranked eight students inappropriately: seven students who did not appear to meet the criteria for its screened program and one priority 2 student who was ranked ahead of 972 unranked priority 1 students. In addition, many of these 972 unranked students had higher scores than some of the students who were ranked.

According to DOE's high school directory, Baruch gives priority preference⁷ (priority 1) to District 2 students or residents; second priority (priority 2) to Manhattan students or residents; and third priority (priority 3) to other City residents. In addition, according to Baruch's selection criteria, students must have grades between 85 and 100 in four core subjects⁸ and scores of 2 or higher on the standardized tests. Baruch also takes attendance and punctuality into account during the ranking process.

When we asked Baruch officials why they ranked seven students who did not appear to have met the screen, the school principal responded that two of the seven students were from private schools. These private schools did not issue numerical grades, but instead had sent narrative reports. Baruch gave beneficial allowances to the other five students who did not appear to meet the academic or attendance screen because of special circumstances that were personal in nature. Baruch did not provide us with any evidence (e.g., copies of the narrative grade reports or other records) to substantiate why the seven students were given preferential treatment. In addition, neither the selection criteria that Baruch officials described to us nor the information in the high school directory indicates that preferential treatment might be given to certain students. As for the priority 2 student who was ranked ahead of priority 1 students who were not ranked, Baruch officials acknowledged that they might have erroneously ranked him or her.

Furthermore, Baruch officials provided us with conflicting information to justify the ranking process. Officials indicated that committee members responsible for the ranking process randomly select students who meet the screen based on the proportional size of their middle schools' qualified applicant base. However, we found that Baruch did not proportionately select students from middle schools. For example, one middle school had none of their 17 student applicants who appeared to have met the screen ranked, yet another middle school had all four of its student applicants who appeared to have met the screen ranked. When we brought this matter to the attention of Baruch officials, they responded that all schools were not proportionally ranked based on the size of the school's qualified applicant base due to the "human factor." Students from a high-performing middle school will have more students ranked over those from struggling schools. However, Baruch did not provide us with the methodology it used to determine which feeder schools were superior. The principal added that "students from [one school] have struggled at our school over the years so we try to pick their strongest students." However, our review of the applicants from this school showed that some of the students who had very high standardized test scores and report card grades were not ranked while students with lower standardized test scores and report card grades were ranked. Furthermore, although selecting the strongest students from either a struggling middle school or a high-performing one would be reasonable, this approach is at odds with Baruch officials' statements that students were selected randomly.

⁷ Although the schools set the priority preferences for eligibility to their programs, as described in the high school directory, SEMS assigns the priority to students using the algorithms integrated into the system based on the schools' priority standards.

⁸ Baruch's four core subjects are English, math, social studies, and science.

In addition, Baruch's practice of randomly selecting students from those who met the screen seems to contradict DOE's statement in the high school directory that for a screened program, "students are ranked by a school based on a student's final seventh grade report card grades and reading and math standardized scores." Based on this ranking criteria, both parents and students are given the impression that applicants with the highest grades will be ranked highest. However, many of the 972 students who Baruch did not rank had higher grades than some of the 237 students who appeared to have met the screen and were ranked. As a result, we question whether Baruch's policy of incorporating random selection into its ranking process is consistent with DOE's description of what constitutes a screened program. Accordingly, we have limited evidence that Baruch's ranking process was conducted fairly and in accordance with DOE's student selection policy for screened programs.

Midwood High School Did Not Adhere to Its Stated Ranking Process

Our review of the 2010-2011 PCL showed that Midwood ranked 284 students who did not appear to have met the screen for its Medical Science Institute Program while opting not to rank 93 students who appeared to have met the screen. In addition, many of the 93 students had higher scores than some of the 1,616 students who appeared to have met the screen and were ranked.

As stated to us, students were to be ranked based on their weighted averages for the four core classes.⁹ However, we found that the top four students all had a weighted average of 110, yet were ranked 157, 546, 1638, and 1839. The next group of students all had a weighted average of 109.7, but Midwood ranked them as 119, 120, and 273. Consequently, it appears that Midwood did not rank students in accordance with its stated criteria.

When we brought this to the attention of Midwood officials, they responded that it could have been an oversight. They also stated that it could have been based upon the "feeder school variance" because not every feeder school maintains the same grading standards. According to them, a student with a 97 average at one feeder school is not the same as a student with a 97 average at another. Midwood officials said they use their years of experience to be able to modify the final rankings based on this consideration. Because of this "feeder school variance," the ranking numbers do not match the sequential order of the students' weighted averages for the four core classes.

Based on Midwood's explanation, there should have at least been consistency in the student rankings from each feeder school. However, we did not find this to be the case. In the above-mentioned example, Midwood ranked two students with identical weighted averages from the same school as 157 and 546. We also identified a number of instances in which Midwood ranked students with lower weighted averages more favorably than students with higher weighted averages from the same feeder school. Accordingly, we have limited evidence that Midwood's ranking process was conducted fairly and in accordance with the school's stated criteria.

⁹ The four core classes are English, math, science, and social studies.

Tottenville High School Did Not Adhere to Its Stated Ranking Process

Our review of the 2010-2011 PCL found that Tottenville ranked three students who did not appear to have met the screen for its Science Institute Program while opting not to rank 74 students who appeared to have met the screen. In addition, many of these 74 students had higher scores than some of the 355 students who appeared to have met the screen and were ranked.

Tottenville officials did not appear to rank students in sequential order based on the results of the rubric they told us they used to calculate the students' composite scores. In some instances, the composite score rankings and the actual rankings were similar. However, we also found that sometimes the ranking numbers jumped around significantly. For example, the student with the 20th highest composite score was ranked 11th, while the student with the 21st highest score was ranked 324th. In another example, the student with the 26th highest composite score was not ranked at all while the student with the 27th highest composite score was ranked 295th.

When we brought these matters to the attention of Tottenville officials, they responded that while the composite scores are used for their initial screening, other factors are considered for the final rankings. They gave an example of two hypothetical students, student A and student B, both having received the same composite score. Student A's score was based on having received grades of 95 or better in all core subjects, while student B's score was based on having received some grades below 90. According to their explanation, Tottenville will downgrade student B's ranking. In the examples cited in the paragraph above, however, we did not find evidence that this applied. Accordingly, we have limited evidence that Tottenville's ranking process was conducted fairly and in accordance with the school's stated criteria.

Townsend Harris High School Generally Adhered to Its Stated Ranking Process

Townsend Harris High School (Townsend Harris) appears to be generally ranking applicants in accordance with its stated ranking process for its Intensive Academic Humanities Program. However, there was some confusion as to what Townsend Harris's rubric was and how it was applied for purposes of ranking the students who applied to the program. This confusion arose because the school did not properly document its ranking criteria. In addition, Townsend Harris did not maintain adequate documentation to support its results.

Initially, our review of the 2010-2011 PCL found that Townsend Harris ranked 30 students who did not appear to have met the screen and did not rank 41 students who appeared to have met the screen. We based our analysis on Townsend Harris's description of the rubric it used.

When we brought our initial findings to the attention of Townsend Harris officials, they enlisted the assistance of the former Assistant Principal for Pupil Personnel Services, who was involved with the admissions process for the 2010-2011 school year. With the former Assistant Principal's assistance, school officials were better able to explain the methodology they employed and the rubric they applied. Using the additional information, we adjusted our analysis and obtained our final results (as shown in Table 1). Ultimately, we found that the school did not rank any student who did not appear to meet its screen. However, it failed to rank four students who appeared to have met the screen.

The importance of the schools formalizing their ranking criteria in writing is supported by this instance in which current school officials were unable to provide us with a clear description of the ranking criteria or the rubric they used.

Similarly, by DOE not requiring the schools to formalize their ranking criteria in writing, its ability to review the fairness and consistent application of the schools' ranking processes is severely limited.

Recommendations

DOE should:

7. Require the high schools to rank all students who apply to screened programs and who meet the criteria. If a school decides that it is not feasible to rank all of these students, the school should document the reason for its decision and the methodology it will use to determine which of these students to rank.

DOE Response: "We agree that where it is not feasible for a high school to rank all students who apply to a screened program and meet the criteria, the school should document the methodology used to determine which students to rank. . . . NYCDOE will remind schools that candidates who do not meet the school's stated screening criteria should in no case be ranked before all qualified candidates applying to the school."

8. Require all schools to have a rubric to determine the ranking order of the applicants who meet the screen.

DOE Response: "We agree that all screened and audition programs should maintain documented rubrics that can be shared with families."

9. Review the ranking practices of the four high school screened programs cited in this report for having a considerable number of questionable student rankings and ensure that the schools are following their stated screens and priorities and DOE's student selection policy for screened programs.

DOE Response: "NYCDOE will engage the four school principals and remind them about the need to adhere to transparent ranking practices."

DETAILED SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective, except for the lack of sufficient, appropriate evidence to determine whether the high school choice data in SEMS was accurate. This issue is further disclosed in the subsequent paragraph. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

In order to perform an accuracy test on the high school choice data in SEMS, we sorted the data by admission code and found that as of October 31, 2011, 215,556 students had been placed through the high school application process and were still enrolled in the same high school, and 68,957 students had been placed through the over-the-counter process. Due to DOE's record retention policies requiring that schools retain documents a minimum of six years, we included only students placed through the high school application process during the period from July 1, 2007, through October 31, 2011. We randomly selected 150 students from this population of 214,905 students. We then requested the original, hard-copy high school application forms for the 150 students in our sample and obtained access to the SEMS archives for the 2009-2010, 2010-2011, and 2011-2012 school years. Our intent was to determine whether the high school choice data in SEMS matched the high school choices listed on the students' original, hard-copy high school application forms. However, DOE was only able to provide the original, hard-copy high school application forms for 14 of the 150 students, which was insufficient for us to draw conclusions. Therefore, we cannot be reasonably assured that the high school choice data in SEMS was accurate.

The scope of this audit covers the period from July 2009 to June 2012. To achieve our audit objective, we performed a number of procedures and tests.

To gain an understanding of DOE's responsibilities pertaining to the high school placement process and to identify audit criteria, we reviewed the following:

- Comptroller's Directive #1, *Principles of Internal Control*, and Agency Financial Integrity Statement (including the Self-Assessment of Internal Controls questionnaire), completed by DOE for calendar year 2010;
- DOE Chancellor's Regulation A-101, *Admissions, Readmissions, Transfers, and List Notices for All Students*;
- DOE Chancellor's Regulation A-820, *Confidentiality and Release of Student Records, Records Retention*;
- NYS Education Department's *Records Retention and Disposition Schedule ED-1*;
- Information posted on DOE's website regarding the high school admissions process, including the High School Admissions Calendar; Description of the High School Admissions Process (e.g., eligibility, admission methods); Listing of Types of High Schools in New York City (e.g., specialized high schools, career and technical education schools); Listing of Publications (e.g., *Directory of the New York City Public High Schools*), Summer Workshop Handouts; and Frequently Asked Questions (e.g., on the types of high schools); and

- *The Mayor's Management Report 2010.*

To obtain an understanding of the functions and the roles of individuals involved with the high school placement process, we met with and/or conducted walk-through observations with officials from DOE's central Office of Student Enrollment, including the Chief Executive Officer, Deputy Chief Executive Officer, Executive Director of High School Enrollment, and Senior Director for Analytics and Operations, as well as officials from the Borough Enrollment Offices. We also met with high school officials to obtain an understanding of the high schools' responsibilities relating to the high school placement process. To understand the high school program selection process, we also attended Citywide high school fairs offered to parents and students.

In order to determine the number of high school students and the methods used for placement, DOE's Office of Student Enrollment provided information on all high school students registered as of October 31, 2011, which was extracted from DOE's Automate the System (ATS) database. The information contained student-level data, such as the student's name, identification number, school, grades, and the method by which the student was placed (whether through the high school application process or the over-the-counter process). We also obtained school-level information from ATS that contained similar information.

To ensure that the two sets of data obtained from ATS reconciled, we performed a consistency test by matching the student-level data to the school-level data for a random sample of 30 schools.

DOE's Office of Student Enrollment also provided an Excel spreadsheet extracted from SEMS that displayed data on the 2010-2011 high school admissions process (for students applying for admission to the ninth grade for September 2011). The spreadsheet identified for each program the school's name and DBN (District, Borough, and Number), the program's name and code, the selection method, seat target, applicants, and matches for the three rounds (Round One [Specialized Round], Round Two [Main Round], and Round Three [Supplementary Round]).¹⁰

We sorted the data on the Excel spreadsheet to identify the number of programs per selection method: 14 for Specialized, 67 for Audition, 176 for Educational Option, 204 for Limited Unscreened, 192 for Screened, 5 for Unscreened, and 29 for Zoned. We then determined which program selection method posed the greatest risk of potential manipulation. Because high school officials have the ability to rank all students on their PCLs for their screened programs and have the most input into the ranking for the screened programs, we identified this category as the one with the highest risk. As a result, it was determined that this was the area to be tested. (For a description of the admissions methods, see the Appendix).

To determine which of the 192 screened programs had the highest risk of potential manipulation by school officials, we identified those programs where applicant demand was high. We sorted the 192 screened programs by borough and selected the screened program with the highest number of applicants in each borough. The five screened programs included in our sample are: (1) Medical Science Institute Program at Midwood in Brooklyn; (2) Baruch College program at Baruch in Manhattan; (3) Intensive Academic Humanities Program at Townsend Harris in Queens; (4) Science Institute Program at Tottenville in Staten Island; and (5) Hostos-Lincoln Academy of Science Program at Hostos in the Bronx.

¹⁰ Starting with the 2011-2012 high school admissions process, there are no longer three rounds; Round One comprises both the specialized round and the main round, and Round Two is the supplementary round.

In order to test the sampled high schools' rankings of applicants for their screened programs, we interviewed school officials to obtain descriptions of the ranking criteria used for the eighth grade students applying for their ninth grade programs. Because the high schools did not have the ranking criteria in writing, four schools reviewed our summaries of their descriptions of the ranking processes and one high school formalized in writing the formula used for its rankings. We then downloaded the 10 PCLs from the SEMS archives onto Excel spreadsheets for the five screened programs in our sample, one for the specialized round and one for the main round. (The admissions process for the 2010-2011 school year included a specialized and main round.) We merged the two downloaded PCL files for each of the five high school programs for the specialized round and the main round into one Excel file and removed the duplicate names of students who appeared in both rounds. Then, we applied each high school's ranking criteria to determine whether the 21,315 students applying to the five screened programs in our sample were appropriately ranked by the high schools (i.e., met the screens). We provided each high school with the results of our test and requested it to provide a response for any anomalies that we found.

To see whether students who did not meet the screens were matched to a program to which they were inappropriately ranked, we searched the 2010-2011 student data extracted from SEMS to determine what programs the students were matched to during the high school application process. We then searched the register as of October 31, 2011, which was extracted from DOE's ATS database, and identified the schools they were reportedly attending as of that date.

DOE High School Admissions Methods

Test

The specialized high schools require students to take the Specialized High Schools Admissions Test (SHSAT) for entrance.¹¹ The test score is the only factor in determining eligibility.

Audition

In order to be eligible for admissions, students are required to audition their talent (e.g., vocal, dance, drama). Some audition programs may also review the student's attendance and academic grades.

Educational Option

Programs are meant to serve a wide range of academic performers. Students are placed into three groups based upon their results on the seventh grade English Language Arts standardized reading exam: top 16 percent, middle 68 percent, and bottom 16 percent. From the applicant pool, half are ranked by the high schools and half are randomly selected by SEMS. Students who scored in the top 2 percent are guaranteed a match to the program if they list the program as their first choice on the high school application form.

Limited Unscreened

High schools give priority to those students who demonstrated an interest in their programs by attending an information session or open house at the school or visiting the school's table at the Citywide or borough-wide high school fairs. Students must sign in at these events in order to be credited with demonstrating interest in the program.

Screened

High schools rank the students based on their screen, such as seventh grade report cards and standardized test scores for English Language Arts and math. Some programs may also review attendance and punctuality. In addition, some high schools may have other selection criteria involving entrance exams, essays, or interviews. For students with a minimum level of English language proficiency, there are screened language programs including bilingual, dual language, and international.

Unscreened

Programs whereby students are randomly selected by SEMS.

Zoned

Programs whereby students are guaranteed admission as long as they are living in the high school's zone.¹² For some schools, there is no zone program. Once a student is admitted to such a school, the student is placed into one of the school's programs.

¹¹ Of the nine specialized high schools in New York City, admissions are based on the score attained on the SHSAT for eight of the specialized schools: (1) Bronx High School of Science, (2) Brooklyn Latin School, (3) Brooklyn Technical High School, (4) High School of Mathematics, Science and Engineering at City College, (5) High School of American Studies at Lehman College, (6) Queens High School for the Sciences at York College, (7) Staten Island Technical High School, and (8) Stuyvesant High School. The exception is Fiorello H. LaGuardia High School of Music & Art and Performing Arts, where an audition is required to seek admission to one of its six programs: (1) dance, (2) drama, (3) instrumental music, (4) technical theater, (5) visual arts, and (6) vocal music.

¹² There are zoned high schools in the Bronx, Brooklyn, Staten Island, and Queens. Manhattan does not have any zoned high schools.



Marc S. Sternberg
Senior Deputy Chancellor
for Strategy and Policy

52 Chambers Street
New York, NY 10007

+1 212 374 0225 tel
+1 212 374 5588 fax

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

May 31, 2013

**Re: Audit Report on the New York City Department of Education's
High School Application Process for Screened Programs (MH12-053A)**

Dear Ms. Kim:

This letter submitted on behalf of the New York City Department of Education ("NYCDOE") constitutes this agency's formal response to the City of New York Office of the Comptroller's ("Comptroller") draft audit report titled *Audit Report on the New York City Department of Education's High School Application Process for Screened Programs* ("Report").

A core goal of the New York City Department of Education (NYCDOE) is to support access to high quality schools for all students. The NYCDOE manages a high school admissions process that streamlines a complicated task for approximately 75,000 families and 400 schools. Each year, our goal is to provide a fair, transparent process that is manageable for schools and families. Consistently over the past five years, more than 75% of students have received one of their top three high school choices.

We know that we still have more work to do. We thank the Comptroller's office for raising a number of important concerns and for making recommendations about how we can continue to improve the high school admissions process for students and their families.

Below are responses to each of the Comptroller's recommendations. Except where otherwise indicated, all action items will be implemented beginning in the 2013-2014 school year.

1. Ensure that the high schools comply with New York State Education Department's *Records Retention and Disposition Schedule ED-1* rule. Specifically, it should ensure the high schools are made aware of the retention requirement and retain the high schools' ranking documentation for a minimum of six years as required.

We agree that high schools should be aware of and comply with New York State Education Department's Records Retention and Disposition Schedule ED-1.

- NYCDOE Office of Student Enrollment (OSE) maintains a snapshot of final rankings uploaded into the Student Enrollment Management System (SEMS) each year.
 - Before the final rankings are uploaded and accepted into SEMS, schools will have to indicate that they have read the retention requirement and understand that they are mandated to retain the ranking documentation for a minimum of six years.
 - OSE will remind schools about the need to maintain and archive any electronic or paper-based records that inform their ranking processes as part of initial communications about the opening of Program Candidate Lists (PCL).
 - OSE will remind principals and guidance counselors about the need to maintain and archive any electronic or paper-based records that inform their ranking processes during annual training sessions.
 - The Office of School Support (OSS) will include information about the Records Retention Policy and Chancellor's Regulation A-820 in Principals' Weekly and School Support Weekly at the beginning and the end of each school year.
2. Require schools to support changes to their rankings that do not adhere to their rubrics by maintaining written explanations or other supporting documentation.

We agree that schools should document changes to their rankings that do not adhere to their rubrics.

- In cases where schools are ranking students in a manner that appears inconsistent with their stated screening criteria:
 1. The school will be required to provide detailed documentation regarding the school's process for ranking students. Documentation may include a scoring rubric or a memo detailing the methodology the school uses to determine ranking.
 2. The school will share the updated language reflecting the school's screening methodology in the following year's high school directory, and/or through a website.
- NYCDOE will sample 6-10 PCLs each year, before the Round 1 and 2 matching processes are finalized to determine if schools are adhering to their published criteria. If the schools cannot demonstrate why candidates were/were not ranked, we will require changes.

3. Require the high schools with screened programs to document their ranking rubrics and processes and submit such documentation to a unit within DOE.

We agree that high schools with screened programs should document their ranking rubrics and processes.

- NYCDOE will issue guidance to schools regarding documentation and publication requirements for ranking rubrics and processes.

4. Review the submitted ranking criteria and periodically evaluate the ranking practices of a sample of screened programs, especially those with high demand, to ensure that the high schools are appropriately ranking students in accordance with their stated criteria.

We agree that the NYCDOE should review the ranking practices of a sample of screened programs annually.

- NYCDOE will sample 6-10 PCLs each year, before the Round 1 and 2 matching processes.
- NYCDOE will intervene when schools are not adhering to their published criteria.
- If schools are adhering to the published criteria, we will review rankings relative to their documented rubrics.
- If schools cannot demonstrate why certain students were or were not ranked, we will require changes.

5. Consider disclosing more detailed information in its high school directory about each school's ranking criteria for its screened programs so that applicants can make a more informed decision as to which school programs they might have the best chance of being admitted.

NYCDOE is committed to including more precise language to reflect school screening methodologies in the high school directory and/or through a website.

6. DOE should ensure that the middle schools are in compliance with DOE Chancellor's Regulation A-820. Specifically, it should ensure that the middle schools are made aware of the retention requirement and retain the high school application forms as required by DOE Chancellor's Regulation A-820.

We agree that high schools should be aware of and comply with NYCDOE Chancellor's Regulation A-820.

- NYCDOE Office of Student Enrollment (OSE) maintains a snapshot of final application data entry uploaded into the Student Enrollment Management System (SEMS) each year.
- As part of initial communications about the opening of Applicant Submission Lists (ASL), OSE will remind schools about the need to maintain and archive any electronic or paper-based records that inform their ranking processes.

- OSS will provide support for middle schools to assure that student records have been properly archived.
 - OSS will include information about Chancellor's Regulation A-820 in Principals' Weekly and School Support Weekly at the beginning and the end of each school year.
 - OSE will remind principals and guidance counselors about the need to maintain and archive any electronic or paper-based records that inform their ranking processes during annual training sessions.
 - NYCDOE will consider adding language at the bottom of the high school application form stating that schools, as per CR A-820, are required to retain a hard copy of the student record.
7. Require the high schools to rank all students who apply to screened programs and who meet the criteria. If a school decides that it is not feasible to rank all of these students, the school should document the reason for its decision and the methodology it will use to determine which of these students to rank.

We agree that where it is not feasible for a high school to rank all students who apply to a screened program and meet the criteria, the school should document the methodology used to determine which students to rank.

- Schools that exhibit high demand may have several thousand applicants who meet their threshold criteria. Assessing and ranking all of the candidates would be a time-consuming and possibly cost-prohibitive endeavor.
 - Schools with screened programs receive data via SEMS that allows them to perform initial ranking and review the pool of applicants to make the ranking process manageable.
 - OSE advises schools to rank a pool of candidates that is four times as large as the match target for each program. Generally, this pool is sufficiently large enough to meet the match target and fill all of the seats in that school or program. Schools with low demand will be required to rank at least 90 percent of their applicant pool. If a school has a history of ranking an insufficient number of candidates, members of the network team will support the school staff in completion of this task.
 - NYCDOE will remind schools that candidates who do not meet the school's stated screening criteria should in no case be ranked before all qualified candidates applying to the school.
8. Require all schools to have a rubric to determine the ranking order of the applicants who meet the screen.

We agree that all screened and audition programs should maintain documented rubrics that can be shared with families.

9. Review the ranking practices of the four high school screened programs cited in this report for having a considerable number of questionable student rankings and ensure that the schools are following their stated screens and priorities and DOE's student selection policy for screened programs.

NYCDOE will engage the four school principals and remind them about the need to adhere to transparent ranking practices.

- NYCDOE is committed to reviewing the ranking practices of a sample of 6-10 screened programs annually.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc S. Sternberg". The signature is fluid and cursive, with the first name "Marc" and last name "Sternberg" clearly distinguishable.

Marc S. Sternberg
Senior Deputy Chancellor for Strategy and Policy