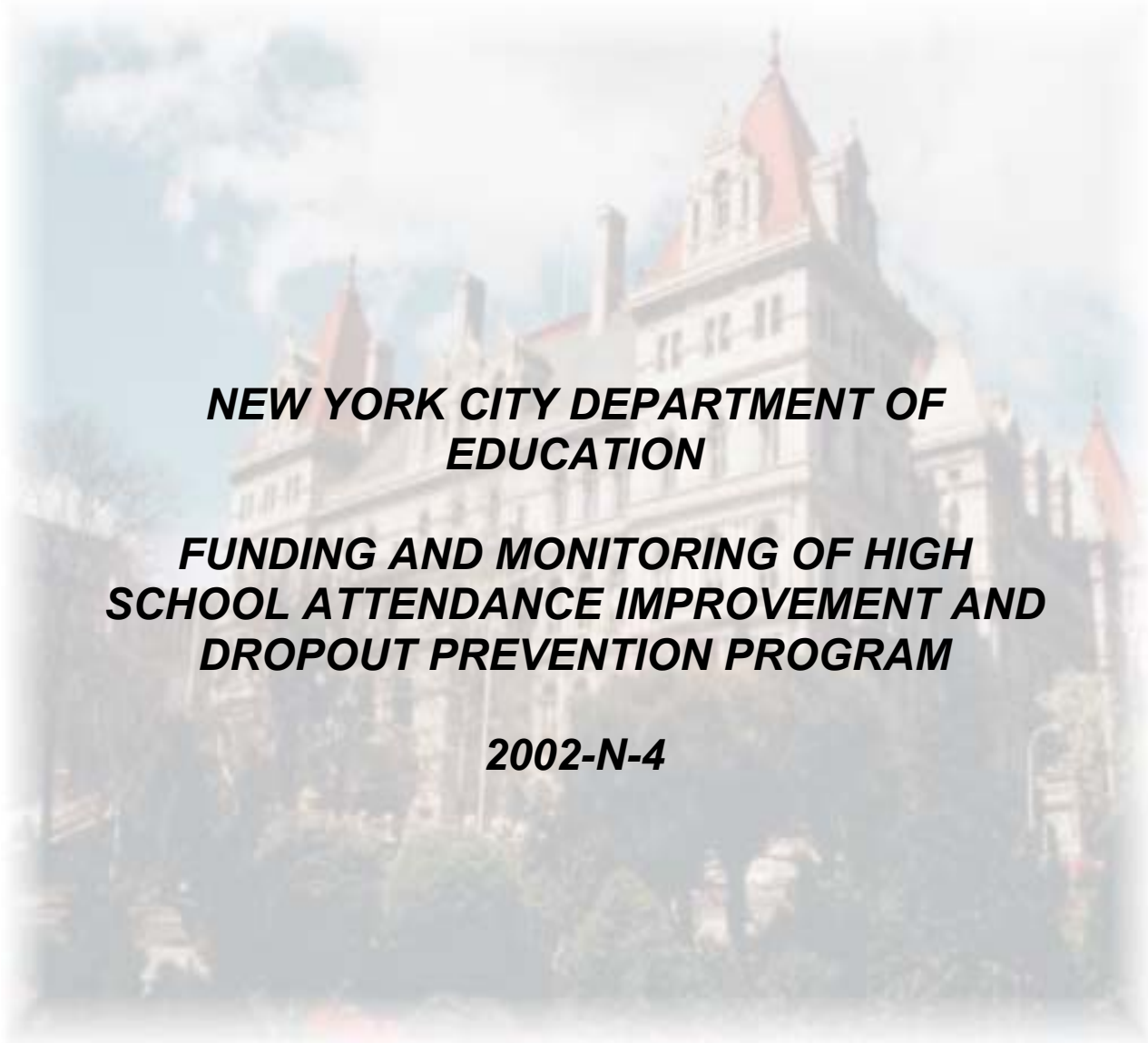


*A REPORT BY THE NEW YORK STATE
OFFICE OF THE STATE COMPTROLLER*

**Alan G. Hevesi
COMPTROLLER**



***NEW YORK CITY DEPARTMENT OF
EDUCATION***

***FUNDING AND MONITORING OF HIGH
SCHOOL ATTENDANCE IMPROVEMENT AND
DROPOUT PREVENTION PROGRAM***

2002-N-4

DIVISION OF STATE SERVICES

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Alan G. Hevesi
COMPTROLLER

Report 2002-N-4

Mr. Joel I. Klein
Chancellor
New York City Department of Education
52 Chambers Street
New York, NY 10007

Dear Chancellor Klein:

The following is our report addressing the actions taken by the New York City Department of Education in allocating and monitoring the State funds provided to New York City high schools for the Attendance Improvement and Dropout Prevention program.

This audit was performed under the State Comptroller's authority as set forth in Article V, Section 1, of the State Constitution; and Article III, Section 33, of the General Municipal Law. Major contributors to this report are listed in Appendix A.

Office of the State Comptroller
Division of State Services

September 18, 2003

EXECUTIVE SUMMARY

NEW YORK CITY DEPARTMENT OF EDUCATION FUNDING AND MONITORING OF HIGH SCHOOL ATTENDANCE IMPROVEMENT AND DROPOUT PREVENTION PROGRAM

SCOPE OF AUDIT

State aid is distributed to school districts on the basis of complex formulas and the districts' eligibility for certain educational programs. One such program is the Attendance Improvement and Dropout Prevention (AIDP) program, in which certain school districts are eligible to receive additional funds to improve their attendance rates and reduce their dropout rates. AIDP funds are restricted, as they must be used for these authorized purposes only (e.g., to hire additional family counselors or attendance coordinators). In the 2001-02 school year, \$53 million in AIDP funding was provided to the New York City Department of Education (Department), which oversees the New York City public school system. The Department allocated \$20 million of this amount to its high schools and the remaining \$33 million to other operations, such as middle and elementary schools.

Our audit addressed the following questions about the Department's administration of the AIDP program in New York City high schools between September 1, 2000 and August 31, 2002:

- Was State aid for the AIDP program distributed and monitored in accordance with requirements?
- Did the high schools participating in the AIDP program achieve certain attendance improvement, dropout prevention and academic performance goals?

AUDIT OBSERVATIONS AND CONCLUSIONS

We identified inconsistencies and control weaknesses in the process used to distribute AIDP funds to high schools. We also found that the funds generally were not monitored by the Department after they were allocated to high schools. We further found that the participating high schools did not achieve

their attendance improvement, dropout prevention and academic performance goals.

In the 2000-01 and 2001-02 school years, the Department allocated a total of \$41 million in AIDP funding to New York City high schools. These funds were to be distributed to certain designated high schools, each of which was to receive a certain budgeted amount. However, we found that some of the designated schools reported that they received significantly less than they were budgeted, some reported that they received significantly more, and some reported that they received no AIDP funding at all. In addition, a total of about \$2.1 million in AIDP funding was distributed to high schools not designated to receive the funds and the disposition of \$823,300 was not fully accounted for. We recommend that significant improvements be made in the process used by the Department to budget and distribute AIDP funds. (See pp. 5-8)

High schools receiving AIDP funds are to use the funds on behalf of targeted students considered most at risk of low attendance or dropping out. However, we found that many of the schools did not target specific students for program services; rather, they planned to use their AIDP funds on behalf of their entire student population. In such instances, students may not receive the full-intended benefit of AIDP-funded services. We recommend that the Department monitor the process used by high schools to enroll students in their AIDP programs, and ensure that the schools take corrective action when students are not targeted as required. (See pp. 8-11)

We determined that, even when students are targeted for the AIDP program, the amount budgeted per targeted student can vary significantly from school to school, ranging from as little as \$111 per student at one school (which was budgeted \$50,000 in AIDP funds and enrolled 450 students in its AIDP program) to as much as \$5,733 per student at another school (which was budgeted \$430,000 in AIDP funds and enrolled 75 students in its AIDP program). We recommend that the Department monitor the variations in AIDP funding-to-student ratios at the high schools, and take corrective action when large variances cannot be justified. (See pp. 10-11)

According to the guidelines for the AIDP program, the Department is supposed to monitor the high schools' AIDP programs through site visits and the review of periodic reports from high school Superintendents. However, we found that the Department generally does not perform these monitoring activities. For example, it does not require that Superintendents submit the required reports. As a result, the Department cannot determine whether AIDP funds are always used as intended, cannot identify best practices that should be replicated at other schools, and cannot identify ineffective practices that should be discontinued. (See pp. 13-15)

The high schools participating in the AIDP program are expected to achieve certain goals: an attendance rate of at least 90 percent, a dropout rate no higher

than 5 percent, and a 90 percent pass rate for students taking Regents exams. However, we found that most of these high schools (like many of the high schools not participating in the AIDP program) did not achieve these goals, and often fell far short of achieving the goals. In the absence of informed assessments about the effectiveness of AIDP program activities, the Department cannot determine whether improvements are needed in these activities or in other aspects of the schools' operations. We recommend that the Department monitor how AIDP funds are used by high schools and make assessments about the effectiveness of the various AIDP program activities. (See pp. 15-17)

COMMENTS OF DEPARTMENT OFFICIALS

Department officials generally agree with our audit recommendations and indicate that they will all be implemented by September 2003. However Department officials did not believe that many of our conclusions were accurate. The Department also stated that attendance improvement and dropout prevention are primary goals of the Department, and they anticipate that attendance and dropout rates will continue to improve.

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AIDP Program High Schools – Budgeted Amounts for the 2001-2002 School Year

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INTRODUCTION

Background

The New York City Department of Education (Department), which was formerly known as the New York City Board of Education, oversees New York City's public school system. This is the largest public school system in the nation, serving about 1.1 million students in more than 1,100 schools during the 2002-2003 school year. While all schools in the system are overseen by the Department, elementary and middle schools were managed by 32 community school districts that were overseen by locally elected school boards. The high schools were managed by the Department through seven high school Superintendents, each of whom was responsible for one of seven districts into which the high schools were organized. (Starting with the 2003-04 school year, the former high school districts and the community school districts will be part of ten city-wide regions).

All public school districts in New York State are funded by a combination of local property taxes, State aid and Federal aid. The State aid is appropriated by the State Legislature and administered by the State Education Department (SED). The State aid is distributed to individual school districts on the basis of complex formulas incorporating numerous factors and on the basis of each district's eligibility for various programs with specific educational objectives.

One such program is the Attendance Improvement and Dropout Prevention (AIDP) program. In this program, certain school districts with relatively high rates of student absences are eligible to receive additional funds that are to be used to improve their student attendance and retention rates. These additional funds, which are classified as "set-aside" funds, are to be used for these authorized purposes only.

To obtain its share of the AIDP funding that is made available each year by the State Legislature, an eligible district must submit a plan to SED describing how its funds will be used in the upcoming school year. If the plan is approved, the funds are provided to the district. The district is then required to report back to SED after the school year, indicating the extent to which

certain attendance improvement and dropout prevention goals were met during the year. The information reported to SED is to be summarized and included in an annual report about the AIDP program that is to be provided to the State Legislature.

Each year, about 90 percent of the State's AIDP funding is provided to New York City schools. In the 2001-02 school year, a total of \$53 million was provided to these schools through the New York City Department of Education. The Department allocated \$20 million to selected high schools and the remaining \$33 million to other operations, such as middle schools and elementary schools.

The Department issues guidelines governing the use of the AIDP funds allocated to its high schools. The guidelines require that the funds be distributed to high schools with attendance rates below the average attendance rate of the high schools in that district. The guidelines do not prescribe specific ways the funds must be used by each school; rather, they require that the funds be used in ways that are consistent with the authorized legislative purpose (improving attendance rates and reducing dropout rates). Often, AIDP funds are used to hire attendance officers, guidance counselors, family counselors and other paraprofessionals, but the funds may be used in many other ways, as well.

Attendance rates and dropout rates are a cause for concern at many New York City public high schools. According to information published by the Department, after seven consecutive years of decline (1991 through 1998), dropout rates increased in each succeeding year; dropping slightly last year, and totaled 20.3 percent for the class of 2002. Moreover, at some high schools the dropout rate was higher than 30 percent. In the 2002-03 school year, the aggregate attendance rate at New York City public high schools was 82.2 percent. In comparison, it is the Department's goal that no high school have an attendance rate below 90 percent and a dropout rate above 5 percent. Thus, if these goals are to be met, it is critical that AIDP funding be used as effectively as possible.

Audit Scope, Objectives and Methodology

We audited the Department's administration of the AIDP program in New York City high schools between September 1, 2000 and August 31, 2002. The objectives of our

performance audit were to determine whether State aid for the AIDP program was distributed and monitored in accordance with requirements, and whether high schools participating in the AIDP program achieved certain attendance improvement, dropout prevention and academic performance goals. To accomplish our objectives, we interviewed officials at the Department's Central Office, selected New York City high schools and SED. We also examined certain Department records and sent a questionnaire to selected high schools.

We conducted our audit in accordance with generally accepted government auditing standards. Such standards require that we plan and perform our audit to adequately assess those operations of the Department that are included within our audit scope. These standards also require that we understand the Department's internal control structure and its compliance with those laws, rules and regulations that are relevant to the operations included in our audit scope. An audit includes examining, on a test basis, evidence supporting transactions recorded in the accounting and operating records and applying such other auditing procedures as we consider necessary in the circumstances. An audit also includes assessing the estimates, judgments and decisions made by management. We believe that our audit provides a reasonable basis for our findings, conclusions and recommendations.

We use a risk-based approach to select activities for audit. We therefore focus our audit efforts on those activities we have identified through a preliminary survey as having the greatest probability of needing improvement. Consequently, by design, finite audit resources are used to identify where and how improvements can be made. Thus, little audit effort is devoted to reviewing operations that may be relatively efficient and effective. As a result, our audit reports are prepared on an "exception basis." This report, therefore, highlights those areas needing improvement and does not address activities that may be functioning properly.

Response of Department Officials to Audit

A draft copy of this report was provided to Department Officials for their review and comment. Their comments were considered in preparing this report and are included as Appendix B.

Within 90 days after the final release of this report, we request that the Chancellor of the New York City Department of Education report to the State Comptroller, advising what steps were taken to implement the recommendations contained in this report, and where recommendations were not implemented, the reasons therefor.

DISTRIBUTION OF PROGRAM FUNDS

In the 2000-01 and 2001-02 school years, the Department allocated a total of \$41 million in AIDP funding to its high schools. These funds were to be distributed to certain designated high schools, each of which was to receive a certain budgeted amount. In addition, the funds were to be used on behalf of targeted students who were considered most at risk of low attendance or dropping out.

However, we found that, in each of these two years, some of the designated high schools reported that they received significantly less than they were budgeted, some reported that they received significantly more, and some reported that they received no AIDP funding at all. In addition, a total of about \$2.1 million in AIDP funding was distributed to high schools not designated to receive the funds and the disposition of \$823,300 was not fully accounted for. We further determined that many of the high schools did not plan to use their AIDP funds for targeted students; rather, they planned to use the funds either for all the students in the school or for certain students chosen at random. We therefore conclude that significant improvements are needed in the process used by the Department to budget and distribute AIDP funds.

Allocation of Funds to High Schools

Each year, the Department issues guidelines for the AIDP program. The guidelines indicate which particular high schools are to receive AIDP funding that year and how much funding will be allocated to each high school. According to the guidelines for the 2000-01 school year, 66 designated high schools were to be allocated certain specified amounts of AIDP funding totaling about \$20 million. According to the guidelines for the 2001-02 school year, 45 designated high schools were to be allocated certain specified amounts of AIDP funding totaling about \$20 million. All 45 schools designated in the 2001-02 year also received funding in the prior year.

To determine whether AIDP funds were distributed to New York City high schools in accordance with the guidelines, we sent a questionnaire to all 45 schools that received funding in both

years and asked school officials how much AIDP funding was distributed to their schools in each year (as is discussed later in this report, our questionnaire also contained other questions about the AIDP program). We received responses from 44 of the 45 schools. According to these responses, in each of the two years examined, the amounts received by many of the schools differed significantly from the budgeted amounts contained in the Department's guidelines.

For example, in the 2001-02 year, nearly half of the schools (21 of 44) reported that they received at least 10 percent less, or at least 10 percent more, than the amount budgeted by the Department. Sixteen of the schools reported receiving at least 10 percent less than was budgeted (by an aggregate amount of about \$2.5 million), including four schools that reporting receiving no AIDP funds that year (two of these schools indicated they were not in the program that year, but the other two schools indicated they were in the program). Five of the schools reported receiving at least 10 percent more than was budgeted (by an aggregate amount of about \$280,000). For instance, James Madison High School in Brooklyn and Far Rockaway High School in Queens were both budgeted to receive \$430,000 in AIDP funds in 2001-02, but both schools reported that they received no AIDP funds for that school year. Similarly, Theodore Roosevelt High School in Bronx was budgeted to receive \$630,000, but the school reported that it received less than half that amount (\$288,415). In comparison, the Media and Communication High School in Manhattan was budgeted to receive \$157,500, but reported that it received an amount 48 percent higher (\$233,478).

In the 2000-01 year, 16 of the 44 schools reported that they received at least 10 percent less, or at least 10 percent more, than the amount budgeted by the Department. Seven of the schools reported receiving at least 10 percent less than was budgeted (by an aggregate amount of about \$1.1 million), including two schools that reported receiving no AIDP funds that year (both schools indicated they were not in the program that year). Nine of the schools reported receiving at least 10 percent more than was budgeted (by an aggregate amount of about \$780,000). In addition, four schools, which together were budgeted a combined total of \$453,000, reported that they did not know how much AIDP funding they actually received that year.

We further determined that, in both of the years we examined, AIDP funds were also provided to additional high schools not designated by the Department's guidelines to receive such funds. The amount of AIDP funding provided to these schools totaled about \$2.1 million. Specifically, in both years, 12 additional alternative high schools received a combined total of \$936,000 in AIDP funding (\$1.9 million for the two-year period). None of these schools were budgeted to receive any AIDP funds in either year. In addition, in the 2000-01 year, another high school not designated by the guidelines (the Brooklyn Global Studies High School) received \$235,000 in AIDP funds. Department officials stated that all 13 high schools should have been designated for AIDP funds in the guidelines, but were omitted due to oversights.

We also determined that the distribution of \$823,300 in AIDP funding was not fully accounted for. These funds were allocated to certain of the administrative districts into which New York City high schools were organized (there were seven such districts, five of which were geographical and generally corresponded to the five City boroughs, and two of which contained specially designated alternative high schools or specially designated Chancellor's high schools during our audit period). However, the Department's records do not indicate how the funds were spent after they were allocated to an administrative district. A total of \$351,330 was allocated to the Bronx and Brooklyn Districts in the 2000-01 school year, and \$472,000 was allocated to the Bronx and BASIS (covering Staten Island and part of Brooklyn) Districts in the 2001-02 school year.

Department officials stated that the amount originally allocated to the BASIS District in the 2001-02 school year (\$430,000) was later reallocated to the Brooklyn District. The officials stated that the funds had to be reallocated because the high school that was to receive the funds was closed and its students were transferred to high schools in the Brooklyn District. We acknowledge that such changes may have to be made, but note that they should be reflected in the Department's records. Otherwise, officials lack assurance that the funds have been used for authorized purposes. We recommend that the disposition of all \$823,300 be fully accounted for.

AIDP funds are intended to help schools with attendance and dropout problems develop solutions to those problems. If officials in these schools can rely on budgeted amounts when making plans for their AIDP program, they are more likely to

make the best possible use of available funds. However, as is shown by our review of AIDP funding in the 2000-01 and 2001-02 school years, AIDP funds often are not distributed in accordance with the Department's budget. Department officials stated that the district Superintendents, who are responsible for distributing the funds to the individual schools within each district, assured them that the funds were distributed in an appropriate manner. If so, improvements may be needed in the Department's budgeting process to enable the budget for the AIDP program to accurately reflect distribution of funds and to include supporting notes where necessary.

For example, in the 2001-02 school year, the Superintendent for the Brooklyn District reportedly redirected \$430,000 in AIDP funds from the high school that was budgeted to receive the funds (the James Madison High School) to two high schools that had previously participated in the AIDP program, but were not budgeted for AIDP funds in that year (the Erasmus Campus High School for Business and Technology, and the Erasmus Campus High School for Science and Math). Department officials stated that these funds were redirected without their authorization. Thus, if these funds were distributed in an appropriate manner, the authorized AIDP budget did not accurately reflect distribution of funds or include supporting notes where necessary.

Use of Funds by High Schools

According to the Department's guidelines for the AIDP program, the high schools receiving AIDP funds are to use the funds to provide support services to targeted students. The students who should be targeted to receive these services are those who are considered most at risk of dropping out of school. The guidelines provide the following criteria for identifying students who are most at risk of dropping out of school:

- students who are current or recent residents of temporary housing;
- students who are pregnant or parenting;
- students who are child abuse victims or are in foster care;
- students who average more than three unexcused absences or instances of tardiness per month;

- students who have poor attendance, academic, or disciplinary records;
- students who have limited English proficiency; or
- students who have a sibling in the AIDP program.

To determine whether the use of AIDP funding by New York City high schools was consistent with these guidelines, we asked school officials various questions about their use of the funding. These questions were included in our questionnaire, which we sent to the 57 high schools that received funding in the 2001-02 school year (the 45 schools that were budgeted for AIDP funds as well as the 12 alternative high schools not included in the budget - See Exhibit A). We did not visit the schools to verify the answers, and did not examine any records that documented how the funds were actually used.

The responses to our questionnaire indicate that for 38 of the 57 high schools certain students were selected for the AIDP program. However, in 19 of the 57 high schools (33 percent), students were not targeted for the AIDP program in accordance with program guidelines. Rather, at these 19 schools, students were reportedly selected to participate in the AIDP program as follows:

- at 17 of the schools, all the students in the school were enrolled in the AIDP program, and
- at 2 of the schools, students were enrolled in the AIDP program at random.

As a result, at these 19 high schools, the goals of the AIDP program were less likely to be achieved. The effectiveness of the program may have been particularly compromised at the 17 schools that reportedly targeted their entire enrollment, as the AIDP funding at these schools was spread over the entire student population. Consequently, in the 2001-02 school year, seven of these schools were budgeted less than \$200 per student for AIDP program activities, and one school was budgeted only \$73 per student. In comparison, at the schools that reportedly targeted students in accordance with the guidelines, AIDP funding was spread over only part of the population. Accordingly, during the 2001-02 school year, 19 of these schools were budgeted more than \$600 per student for AIDP program activities, and six of the schools were budgeted

at least \$2,000 per student. A student enrolled in a program budgeted at more than \$2,000 per student is likely to receive more attention than a student enrolled in a program budgeted at less than \$200 per student.

The responses to our questionnaire also indicate that AIDP funds were spent in many different ways. Most of the schools stated that they used the funds to hire either guidance counselors, attendance coordinators, school aides to support attendance outreach activities, or additional teachers to reduce class size. Other uses included before-school and after-school programs, tutorial programs, family paraprofessionals, family outreach workers, outside experts, social workers, instruction counseling, dance instructors, field trips, and monetary incentives for students. At one school, the officials stated they did not know how the funds were spent.

The responses further indicate that, even when students are targeted for the AIDP program in accordance with program guidelines, the amount budgeted per targeted student can vary significantly from school to school, ranging from as little as \$111 per student at one school (which was budgeted \$50,000 in AIDP funds and reportedly enrolled 450 students in its AIDP program) to as much as \$5,733 per student at another school (which was budgeted \$430,000 in AIDP funds and reportedly enrolled 75 students in its AIDP program). Generally, the responses indicated that students were targeted on the basis of poor attendance and poor academic performance. In light of the large variances that we identified in the AIDP funding level per targeted student, we question whether additional guidance is needed to provide adequate assurance that an appropriate number of students are enrolled in a school's AIDP program.

Department officials indicated that steps were being taken to increase accountability over the use of AIDP funds. They stated that, beginning in the 2003-04 school year, each Regional Superintendent will perform a quarterly review of the AIDP expenditures, services and student selection process at each AIDP high school in the region. Department officials also cautioned that AIDP services must be based on students' particular needs and therefore will not always be proportionate to AIDP funding. They further note that the number of students served by a particular school will be influenced by the type of services that are funded by the school. We acknowledge that variations in funding ratios may be justified by differing circumstances. However, we question whether it would ever be

appropriate for an AIDP program to include the entire student population of a school. Program guidelines clearly indicate that certain students are to be assisted rather than the entire population.

In response to our draft audit report, DOE officials stated that certain concerns cited in the report were inaccurate, as they relied on information obtained through a survey without verification.

Auditor's Comments:

We believe that the information requested and obtained from responsible school officials reflects their knowledge of program operations, and provides an accurate portrayal of their understanding related to the funding received, and the number of students served.

Recommendations

1. Ensure that the Department's annual AIDP program budget accurately reflects the AIDP funds that are allocated to individual high schools and includes supporting notes where necessary.
2. Account for the disposition of the \$823,300 in AIDP funds.
3. Monitor the process used by AIDP high schools to enroll students in their AIDP programs, and ensure that the schools take corrective action when students are not enrolled in accordance with program guidelines.
4. Monitor the variations in AIDP funding-to-student ratios at the high schools, and take corrective action when large variances cannot be justified.

(Department officials agreed to implement recommendations 1 through 4. They stated that administration of the AIDP program has been decentralized and Regional Superintendent offices will now be responsible for monitoring the program).

MONITORING OF PROGRAM ACTIVITIES

According to the Department's guidelines for the AIDP program, certain designated units in the Department's Central Office are responsible for monitoring AIDP program activities at individual high schools and providing technical assistance to the high schools. To facilitate this monitoring and to meet certain SED requirements, the Superintendents for the high schools are responsible for providing the Central Office with certain plans and progress reports relating to AIDP program activities.

However, we found that these monitoring and reporting requirements generally are not met. As a result, the effectiveness of the AIDP program in New York City high schools cannot be fully evaluated. In particular, it cannot be determined to what extent any progress, or lack of progress, in achieving program goals has been influenced by the distribution of AIDP funds. In the absence of such a determination, AIDP funds may become indistinguishable from other general purpose State aid that is distributed to the schools.

In addition, the high schools participating in the AIDP program are expected to achieve certain goals: an attendance rate of at least 90 percent, a dropout rate no higher than 5 percent, and a 90 percent pass rate for students taking Regents exams. However, we found that most of these high schools did not achieve these goals, and often fell far short of achieving the goals.

Monitoring and Reporting

According to the Department's guidelines for the AIDP program, the Department's Office of Monitoring and School Improvement (OMSI) is responsible for reviewing the program's administration and financial management at individual high schools. In particular, OMSI staff are to make site visits to participating high schools, during which school officials are to be interviewed and program records are to be examined. According to the AIDP guidelines, these records should be maintained by both the participating high schools and the district Superintendent. The guidelines further indicate that the

Department's Division of Student Support Services (DSSS) is responsible for providing participating high schools with technical assistance related to AIDP program design and implementation. In addition, each participating school is to designate an AIDP program School Coordinator.

In the questionnaire that we sent to the 57 participating high schools, we asked the School Coordinators about the guidance and oversight that had been provided by OMSI and DSSS. We also conducted interviews with officials of OMSI and DSSS. We found that minimal guidance and oversight has been provided to the participating high schools. For example, according to Department officials, OMSI stopped monitoring the AIDP program during the 1996-97 school year, and only one staff member within DSSS has any responsibilities relating to the AIDP program. The participating high schools indicated that, generally, they have received little to no guidance from the Department. For example, six schools (Concord, Redirection, Park East, West Side, Far Rockaway and Urban Peace Academy) stated that they had received no guidance at all about how AIDP funds should be used.

DSSS officials stated that the AIDP guidelines for the 2003-04 school year will require additional oversight to be provided by the Superintendents. While such local oversight is beneficial, the Department itself also must be involved to a greater extent in AIDP program oversight.

Each school year, the Superintendents for the participating high schools are required to submit to DSSS mid-year and final reports on their AIDP programs. However, we found that these reports are not submitted to the Department and are not prepared by the Superintendents. DSSS officials told us they do not require the reports because the attendance and graduation statistics can be obtained from the Automate The School (ATS) computerized information system that is maintained by the Department.

We do not agree that the potential availability of the ATS information can substitute for an explicit reporting requirement. Moreover, since the participating high schools are not being asked to submit the required information in the context of an AIDP reporting requirement, they are not being held fully accountable for their use of AIDP funds. We therefore maintain that the mid-year and year-end reporting requirements should be met in an active and explicit manner.

Each year, the seven administrative districts for New York City high schools were required to submit a plan to the Department. This plan was supposed to describe the actions that will be taken by the participating high schools in their AIDP programs. The information in these individual plans was then consolidated by the Department and submitted to SED. (Starting with the 2003-04 school year, the former high school districts and the community school districts will be part of ten city-wide regions).

We examined the AIDP plans that were submitted to the Department by the seven administrative districts for the 2000-01 school year. We found that only one of the seven plans (the plan submitted by the BASIS District) contained adequate information about the program, and that was interspersed throughout the plan. We note Section 3602 of the State Education Law, which authorized the AIDP program, requires that measurable goals and outcomes of this nature be included in a school district's annual plan for its AIDP program. However, the AIDP plans that were submitted by the other six administrative districts did not describe the additional actions that would be taken as a result of the participating high schools' AIDP programs. Instead, the actions described were the kind of the actions that would normally be taken by a high school, whether it was participating in the AIDP program or not.

Department officials stated that the plans prepared by the administrative districts provided comprehensive descriptions of the districts' efforts to address the educational needs of all students in every school and indicated all the funds, including AIDP funding, used by the schools to support instructional services and student services. We acknowledge the need for the plans to be comprehensive, since they must meet other reporting requirements in addition to the requirements of the AIDP program. However, to meet the statutory requirements of this program, the plans must also contain specific descriptions of AIDP program activities as well as measurable goals and outcomes for these activities.

Program Results

The Department is supposed to monitor AIDP program activities through site visits and the review of periodic program reports. However, as was described in the previous section of this report, the Department generally does not perform these activities. As a result, the Department is in no

position to make informed assessments about the effectiveness of the various AIDP program activities at the participating high schools. While the Department can monitor the attendance rates and dropout rates at these particular schools, and determine whether improvements are made, it cannot determine to what extent any such improvements, or lack of improvements, are influenced by AIDP program activities. It cannot identify best practices that should be replicated in other schools, and cannot identify ineffective practices that should be discontinued. It cannot even determine whether AIDP funds are always used as intended.

The effectiveness of the AIDP program in New York City high schools could be enhanced if the Department were in a position to make such assessments. Moreover, in the absence of such assessments, the actual effectiveness of the AIDP program in New York City high schools cannot be fully determined.

For example, the high schools participating in the AIDP program are expected to achieve certain goals: an attendance rate of at least 90 percent, a dropout rate no higher than 5 percent, and a 90 percent pass rate for students taking Regents exams. However, we found that most of these high schools (like many of the high schools not participating in the AIDP program) did not achieve the goals, and often fell far short of achieving the goals. In the absence of informed assessments about the effectiveness of AIDP program activities, the Department cannot determine whether improvements are needed in these activities or in other aspects of the schools' operations. We recommend that the Department monitor how AIDP funds are used by high schools and make assessments about the effectiveness of the various AIDP program activities.

The high schools participating in the AIDP program are expected by the Department to achieve a dropout rate no higher than 5 percent. However, according to the information maintained by the Department, in the 2000-01 school year, the average dropout rate for the high schools participating in the AIDP program was 18.8 percent. While this was better than the average dropout rate at the non-participating high schools (21.0 percent), it was still far short of the Department's goal. We recommend that the Department set interim goals for reducing the gap between the 5 percent goal and actual dropout rates at New York City high schools.

The high schools participating in the AIDP program are expected by the Department to achieve an attendance rate of at least 90 percent (the expected attendance rate was at least 85 percent between 1998 and 2000). We found that about half of the AIDP schools met the 85 percent standard in 1998 and 1999, dropping to 12 percent in 2000, but only 3 percent of the AIDP schools met the 90 percent standard in the 2000-01 school year. During this year, about 20 percent of the non-AIDP schools met the 90 percent standard.

The high schools participating in the AIDP program are also expected by the Department to achieve a 90 percent pass rate for students taking Regents English and Sequential Math exams. However, we found that the participating high schools generally have not achieved this goal. For example, during the 2000-01 school year, the average pass rate at the participating high schools for the English exam was 53.0 percent, while the average pass rate for the math exams was 28.2 percent. In comparison, the average pass rates at the non-participating high schools during the same period were 68 percent for the English exam and 41 percent for the math exams. We note that, if pass rates on Regents exams do not improve, retention rates are also unlikely to improve to any appreciable extent.

Recommendations

5. Monitor how AIDP funds are used by high schools and take corrective action when funds are not used in accordance with AIDP program guidelines.
6. Require the Superintendents to submit mid-year and year-end reports on their AIDP programs, and use the reports to make assessments about the effectiveness of AIDP program activities.
7. Require the annual AIDP plans submitted by the Superintendents to include descriptions of planned AIDP program activities and measurable performance goals and outcomes relating to student attendance, retention and academic performance.

Recommendations (Cont'd)

8. Set interim goals for reducing the gap between the 5 percent goal for dropout rates and actual dropout rates at high schools participating in the AIDP program. Include these goals in the guidelines for the AIDP program.

(Department officials agreed to implement recommendation number 5 through number 8. They stated that the revised AIDP guidelines for the 2003-04 school year will incorporate the audits requests to have more detailed plans, and will contain interim goals for reducing the gap between the 5 percent dropout rate goal and actual dropout rates).

BUDGETED AMOUNTS FOR THE 2001-2002 SCHOOL YEAR

AIDP Program High Schools	Budgeted Amounts	AIDP Program High Schools	Budgeted Amounts
Manhattan Superintendent Office		BASIS Superintendent Office	
1. B. Rustin of Humanities	\$430,000	30. Automotive	\$630,000
2. Louis E. Brandeis	465,880	31. Brooklyn School – Global Studies	235,000
3. Martin L. King, Jr	430,000	32. Boys and Girls	430,000
4. Park West	430,000	33. El Puente Academy	235,000
5. R. Green – Teaching	430,000	34. George Westinghouse	630,000
6. Seward Park	394,706	35. Harry Van Arsdale	630,000
Bronx Superintendent Office		36. John Jay	630,000
7. Adlai E. Stevenson	630,000	37. Lafayette	430,000
8. Alfred E. Smith	430,000	Alternative Superintendent Office	
9. Christopher Columbus	430,000	38. Bronx Coalition	50,000
10. Evander Childs	430,000	39. Bronx Regional	45,000
11. Grace H. Dodge	430,000	40. Concord	50,000
12. Harry S. Truman	430,000	41. Redirection	42,000
13. Health Opportunities	235,000	42. Monroe Academy - Business/Law	235,000
14. John F. Kennedy	430,000	43. Monroe Academy - Visual Arts	235,000
15. Morris	630,000	44. Repertory School	50,000
16. Walton	430,000	45. Street Academy	42,000
Brooklyn Superintendent Office		46. University Heights	50,000
17. Bushwick	630,000	47. Urban Peace Academy	42,000
18. Canarsie	430,000	48. Park East	45,000
19. Erasmus Camp: Humanities	430,000	49. West Side	50,000
20. George W. Wingate	465,880	Chancellor's Superintendent Office	
21. James Madison	430,000	50. Enterprise, Business / Technical	235,000
22. Prospect Heights	430,000	51. Legal Studies	235,000
23. Sheepshead Bay	430,000	52. Health, Career and Science	157,500
24. William H. Maxwell	430,000	53. Health, Business and Finance	157,500
Queens Superintendent Office		54. Law and Public Service	157,500
25. August Martin	430,000	55. Media - Communication	157,500
26. Far Rockaway	430,000	56. Theodore Roosevelt	630,000
27. Franklin K. Lane	430,000	57. William H. Taft	665,880
28. John Adams	430,000	Total	\$20,093,346
29. Springfield Gardens	430,000		

MAJOR CONTRIBUTORS TO THIS REPORT

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THE NEW YORK CITY DEPARTMENT OF EDUCATION
Diana Lam , <i>Deputy Chancellor</i>
OFFICE OF THE CHANCELLOR
52 Chambers Street New York, New York 10007

July 1, 2003

Steven E. Sossei, Audit Director
Office of the State Comptroller
110 State Street
Albany, New York 12236

Re. Draft Audit Report on the Actions Taken
by the NYC Department of Education in
Allocating and Monitoring the State Funds
Provided to High Schools for the AIDP
Program (2002-N-4)

Dear Mr. Sossei:

This letter, with the attachments, reflects the New York City Department of Education's ("Department") response to the findings and recommendations made in the above-referenced Draft Audit Report ("Draft Report") of the Office of the State Comptroller.

As you know, effective July 1, 2003, the Department will be restructured. At the central level, the Office of Youth Development and School Community Services will have direct oversight over the AIDP program. At the local level, AIDP funded schools will be the responsibility of each of the ten Regional Instructional Superintendents. The regional superintendent will be responsible for instituting a quarterly review of all AIDP schools. These reviews will include but will not be limited to the school's expenditures, services provided to the students and the process used by the schools for student selection. The reviews and their outcomes will be shared and discussed with the central office for final approval.

We sincerely believe that the concerns cited in the draft report are inaccurate. The auditors' conclusions were based primarily on information obtained from the school surveys without ever visiting the schools to verify the answers or examine the fiscal documentation cited in the report.

Re. Draft Audit Report on the Actions Taken by the
NYC Department of Education in Allocating and
Monitoring the State Funds Provided to High
Schools for the AIDP Program (2002-N-4)

Attendance improvement and dropout prevention are primary goals of the Department and with the continued support of the State Legislature, we anticipate that our attendance and dropout rates will continue to improve.

Sincerely,



Diana Lam,
Deputy Chancellor for Training and Learning

DL:nf
Enclosures

C:	Joel I. Klein	Chad Vignola	Lester Young
	Gloria Buckery	Kathleen Cashin	Judith J. Chin
	Carmen Farina	Michelle Fratti	Shelley Harwayne
	Laura Rodriguez	Lucille Swarns	Irma Zardoya
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NEW YORK CITY DEPARTMENT OF EDUCATION
OFFICE OF AUDITOR GENERAL
External Audit Services

PAGE 1 OF 8

RESPONSE DATE: June 13, 2003

AUDIT TITLE: Funding and monitoring of High School Attendance Improvement and Dropout Prevention Program

AUDITING AGENCY: New York State Comptroller

DIVISION: Office of Youth Development and School Community Services

DRAFT REPORT DATE: May 8, 2003

AUDIT NUMBER: 2002-N-4

**C. RECOMMENDATION WHICH THE AGENCY
AGREES WITH BUT IS PENDING IMPLEMENTATION**

1. Ensure that the Department's annual AIDP program budget accurately reflects the AIDP funds that are allocated to individual high schools and includes supporting notes where necessary.

RESPONSE TO RECOMMENDATION

The Regional Superintendent's office will be responsible to review the scheduling of AIDP funds to ensure that the appropriate funding levels are provided to the schools as per the program guidelines. The AIDP Guidelines for 2003-2004 will incorporate the audit's increased oversight recommendations, by having the Superintendents institute a quarterly review with each AIDP funded school. This review will include the school's AIDP expenditures.

TARGET IMPLEMENTATION DATE

September 2003

RESPONSIBILITY CENTER

Office of Youth Development and School Community Services

Signature:

Blamme Morales

Print Name:

Print Title: Director of Youth Engagement

6/30/03

Date

NEW YORK CITY DEPARTMENT OF EDUCATION
OFFICE OF AUDITOR GENERAL
External Audit Services

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DRAFT REPORT DATE: May 8, 2003

AUDIT NUMBER: 2002-N-4

**C. RECOMMENDATION WHICH THE AGENCY
AGREES WITH BUT IS PENDING IMPLEMENTATION**

2. Account for the disposition of the \$823,300 in AIDP funds.

RESPONSE TO RECOMMENDATION

A report will be prepared by our budget office accounting for the \$823,300 in question.

TARGET IMPLEMENTATION DATE

September 2003

RESPONSIBILITY CENTER

Office of Youth Development and School Community Services

Signature:

Dianne Morales

Print Name:

Print Title: Director of Youth Engagement

7/1/03

Date

NEW YORK CITY DEPARTMENT OF EDUCATION
OFFICE OF AUDITOR GENERAL
External Audit Services

PAGE 3 OF 8

RESPONSE DATE: June 13, 2003

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AUDITING AGENCY: New York State Comptroller

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DRAFT REPORT DATE: May 8, 2003

AUDIT NUMBER: 2002-N-4

**C. RECOMMENDATION WHICH THE AGENCY
AGREES WITH BUT IS PENDING IMPLEMENTATION**

3. Monitor the process used by AIDP high schools to enroll students in their AIDP programs, and ensure that the schools take corrective action when students are not enrolled in accordance with program guidelines.

RESPONSE TO RECOMMENDATION

The Regional Superintendent's office will be responsible to review the criteria with the school's AIDP staff. The AIDP Guidelines for 2003-2004 will incorporate the audit's increased oversight recommendations, by having the Regional Superintendents institute a quarterly review with each AIDP funded school. This review will include the process used by the school in selecting the students that will receive the AIDP funded services. Based on this review ineligible students will be removed.

TARGET IMPLEMENTATION DATE

September 2003

RESPONSIBILITY CENTER

Office of Youth Development and School Community Services

Signature:

Glenn Morales

Print Name:

Print Title: Director of Youth Engagement

7/1/03

Date

NEW YORK CITY DEPARTMENT OF EDUCATION
OFFICE OF AUDITOR GENERAL
External Audit Services

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DIVISION: Office of Youth Development and School Community Services

DRAFT REPORT DATE: May 8, 2003

AUDIT NUMBER: 2002-N-4

**C. RECOMMENDATION WHICH THE AGENCY
AGREES WITH BUT IS PENDING IMPLEMENTATION**

- 4. Monitor the variations in AIDP funding-to-student ratios at the high school, and take corrective action when large variances cannot be justified.

RESPONSE TO RECOMMENDATION

The services provided must be based on a students needs and cannot be proportioned to the funding. Also, the AIDP services the schools decide to fund impacts on the number of students served. For example, an AIDP funded attendance teacher can possibly interact with the entire student body, while an AIDP funded classroom teacher or guidance counselor will have a much smaller cohort of students due to their union contracts or the levels of service the students need. The AIDP Guidelines for 2003-2004 will incorporate the audit's increased oversight recommendations, by having the Regional Superintendents institute a quarterly review with each AIDP school. This review will include the school's AIDP expenditures in relationship to the AIDP services being provided and to the number of students served.

TARGET IMPLEMENTATION DATE

September 2003

RESPONSIBILITY CENTER

Office of Youth Development and School Community Services

Signature:

Blanca Morales

Print Name:

Print Title: Director of Youth Engagement

7/1/03

Date

NEW YORK CITY DEPARTMENT OF EDUCATION
OFFICE OF AUDITOR GENERAL
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DRAFT REPORT DATE: May 8, 2003

AUDIT NUMBER: 2002-N-4

**C. RECOMMENDATION WHICH THE AGENCY
AGREES WITH BUT IS PENDING IMPLEMENTATION**

5. Monitor how AIDP funds are used by high schools and take corrective action when funds are not used in accordance with AIDP program guidelines.

RESPONSE TO RECOMMENDATION

The Regional Superintendent's office will be responsible to monitor program records and to ensure guideline compliance. The AIDP Guidelines for 2003-2004 will incorporate the audit's increased oversight recommendations, by having the Superintendents institute a quarterly review with each AIDP school. This review will include the school's AIDP expenditures, the AIDP services being provided to the students as well as the process used by the school in selecting the students. Based on this review, funds not used in accordance with the AIDP program guidelines, will be disallowed

TARGET IMPLEMENTATION DATE

September 2003

RESPONSIBILITY CENTER

Office of Youth Development and School Community Services

Signature:

Alamara Morales

Print Name:

Print Title: Director of Youth Engagement

7/1/03

Date

NEW YORK CITY DEPARTMENT OF EDUCATION
OFFICE OF AUDITOR GENERAL
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DRAFT REPORT DATE: May 8, 2003

AUDIT NUMBER: 2002-N-4

**C. RECOMMENDATION WHICH THE AGENCY
AGREES WITH BUT IS PENDING IMPLEMENTATION**

6. Require the Regional Superintendents to submit mid-year and year-end reports on their AIDP programs, and use the reports to make assessments about the effectiveness of AIDP program activities.

RESPONSE TO RECOMMENDATION

Although the mid and end of year data required for the AIDP reports is automatically collected centrally by the Department, the AIDP Guidelines for 2003-2004 will incorporate the audit's request to have the Regional Superintendents submit the reports in order for the Superintendents to assess the effectiveness of their school's AIDP funded program.

TARGET IMPLEMENTATION DATE

September 2003

RESPONSIBILITY CENTER

Office of Youth Development and School Community Services

Signature:

Alanna Maale

Print Name:

Print Title: Director of Youth Engagement

7/1/03

Date

NEW YORK CITY DEPARTMENT OF EDUCATION
OFFICE OF AUDITOR GENERAL
External Audit Services

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RESPONSE DATE: June 13, 2003

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AUDITING AGENCY: New York State Comptroller

DIVISION: Office of Youth Development and School Community Services

DRAFT REPORT DATE: May 8, 2003

AUDIT NUMBER: 2002-N-4

**C. RECOMMENDATION WHICH THE AGENCY
AGREES WITH BUT IS PENDING IMPLEMENTATION**

7. Require the annual AIDP plans submitted by the Superintendents to include descriptions of planned AIDP program activities and measurable performance goals and outcomes relating to student attendance, retention and academic performance.

RESPONSE TO RECOMMENDATION

SED does not require a separate Attachment to the DCEP for the use of AIDP funds. The DCEP presently provides a comprehensive description of the efforts by the Regional Superintendents to address the educational needs of all students in every school under their jurisdiction. A DCEP Action Plan indicates all the funds, including AIDP, used by the schools to support instructional programs and student services. We will however have the AIDP Guidelines for 2003-2004 incorporate the audits request to have the plans be more detailed in the role of the AIDP programs.

TARGET IMPLEMENTATION DATE

September 2003

RESPONSIBILITY CENTER

Office of Youth Deveopment and School Community Services

Signature:

Alfonso Morales

Print Name:

7/1/03

Date

Print Title: Director of Youth Engagement

Print Title:

Audit Implementation Plan Form C

NEW YORK CITY DEPARTMENT OF EDUCATION
OFFICE OF AUDITOR GENERAL
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DIVISION: Office of Youth Development and School Community Services

DRAFT REPORT DATE: May 8, 2003

AUDIT NUMBER: 2002-N-4

**C. RECOMMENDATION WHICH THE AGENCY
AGREES WITH BUT IS PENDING IMPLEMENTATION**

8. Set interim goals for reducing the gap between the 5 percent goal for dropout rates and actual dropout rates at high schools participating in the AIDP program. Include these goals in the guidelines for the AIDP program.

RESPONSE TO RECOMMENDATION

Under the State Education Department's (SED) System of Accountability for school Success (SASS) and the federal No Child Left Behind (NCLB) accountability systems, school performance is assessed based on the performance of students in the four-year Regents cohort. For 2001-2002, the cohort is defined as all students who first entered grade 9 in 1998-1999, and who were enrolled in the school on October 4, 2000 and June 13, 2002. Students discharged as dropouts after October 4, 2000 remain in the cohort. The SED standard is that 90 percent of the cohort meet graduation requirements for English and mathematics. Schools below these standards are assigned adequate yearly progress (AYP) targets. A school that meets the state standard in a given year does not have an AYP target in the following year. The attached 2000-2001 AYP, report for the AIDP schools provided by the Department's assessment and evaluation office is attached. The AIDP guidelines for 2003-2004 will incorporate the audit's request to have interim goals for reducing the gap between the 5 percent goal dropout rates and actual dropout rates in the AIDP funded high schools.

TARGET IMPLEMENTATION DATE

September 2003

RESPONSIBILITY CENTER

Office of Youth Development and School Community Services

Signature:

Blairne Morales

Print Name:

Print Title: Director of Youth Engagement

1/1/03

Date

Print Title:

AIDP PROGRAM HIGH SCHOOLS

** cited as SURR school in this subject -- used SURR minimums/targets instead of AYP targets

(3) = Portfolio schools

na = no targets and/or no test results

School Name	Met AYP Targets			
	00-01		01-02	
	ELA	M	ELA	M
Manhattan				
BAYARD RUSTIN	Yes	No	Yes	Yes
LOUIS D. BRANDEIS HIGH SCHOOL	Yes	No	Yes	Yes
MARTIN LUTHER KING JR.	Yes	No	Yes	Yes
PARK WEST	Yes	No	na	na
RICHARD GREEN HS OF TEACHING	No	No	Yes	Yes
SEWARD PARK	No	No	No	No
Bronx				
ADLAI E. STEVENSON HIGH SCHOOL	No**	na	Yes**	Yes**
ALFRED E. SMITH HIGH SCHOOL	Yes**	na	Yes**	Yes**
CHRISTOPHER COLUMBUS	Yes	Yes	Yes	Yes
EVANDER CHILDS	Yes	No	Yes	Yes
GRACE H. DODGE	No	No	No	Yes
HARRY S. TRUMAN	No	No	Yes	Yes
HEALTH OPPORTUNITIES	No	No	Yes	Yes
JOHN F. KENNEDY	No	No	Yes	Yes
MORRIS	No	No	Yes	Yes
WALTON	Yes	No	Yes	Yes
Brooklyn				
BUSHWICK	No	No	No	No
CANARSIE	No	No	No	No
ERASMUS HALL CAMPUS: HUMANITIES	na	na(3)	No	No(3)
GEORGE WINGATE HIGH SCHOOL	No	na	Yes	No**
JAMES MADISON	Yes	na	No	No
PROSPECT HEIGHTS	No	No	Yes	No
SHEEPSHEAD BAY	No	No	Yes	No
WILLIAM H. MAXWELL VOCATIONAL	No	No	Yes	No
Queens				
AUGUST MARTIN	Yes	No	No	No
FAR ROCKAWAY	No	No	No	Yes
FRANKLIN K. LANE	Yes	No	na	na
JOHN ADAMS	No	No	Yes	Yes
SPRINGFIELD GARDENS	Yes	No	No	Yes
BASIS				
AUTOMOTIVE HIGH SCHOOL	Yes**	Yes**	Yes**	Yes**
BOYS AND GIRLS	No	No	Yes	Yes
BROOKLYN SCHOOL FOR GLOBAL STUDIES	No	na(3)	Yes	Yes(3)
EL PUENTE ACADEMY FOR PEACE AND JUSTICE	na	na(3)	No	na(3)
GEORGE WESTINGHOUSE	Yes	No	Yes	Yes
HARRY VAN ARSDALE	Yes	No	No	No
JOHN JAY HIGH SCHOOL	No**	na	No**	No**
LAFAYETTE	Yes	No	No	No
Alternative				
BRONX COALITION	na	na(3)	Yes	Yes(3)
BRONX REGIONAL	Yes	Yes	No	No
CONCORD HIGH SCHOOL	No**	na	No**	No**
REDIRECTION	na	na(3)	Yes	Yes(3)
MONROE ACADEMY: BUSINESS & LAW	No	No	No	na
MONROE ACADEMY: VISUAL ARTS & DESIGN	No	No	Yes	Yes
NYC PUBLIC SCHOOL REPERTORY	No	No	No	No
STREET ACADEMY	Yes	No	Yes	Yes
UNIVERSITY HEIGHTS	na	na(3)	Yes	Yes(3)
URBAN PEACE ACADEMY	na	na(3)	Yes	Yes(3)
PARK EAST	Yes	No	Yes	Yes
WEST SIDE	na	na(3)	Yes	Yes(3)
Chancellor's				
H.S. FOR ENTERPRISE, BUSINESS & TECH	na	na	Yes	No
HIGH SCHOOL FOR LEGAL STUDIES	Yes**	Yes**	Yes**	Yes**
SCHOOL FOR HEALTH CAREERS & SCIENCE	na	na	na	na
SCHOOL FOR INT'L BUS. & FINANCE	na	na	na	na
SCHOOL FOR LAW & PUBLIC SERVICE	na	na	na	na
SCHOOL FOR MEDIA & COMMUNICATIONS	na	na	na	na
THEODORE ROOSEVELT HIGH SCHOOL	Yes	No	Yes	No
WILLIAM H. TAFT HIGH SCHOOL	na	na	No**	No**