



New York State Comptroller
THOMAS P. DiNAPOLI

College Readiness

New York City Department of
Education

Report 2021-N-1 | October 2022

Spotlight on Education



Audit Highlights

Objective

To determine whether the New York City Department of Education is adequately preparing students for post-secondary institutions. Our audit covered the period from September 2015 through March 2022 and included students who were expected to graduate high school by August 2019.

About the Program

According to the U.S. Department of Education, three-quarters of the fastest-growing occupations require education beyond a high school diploma – a college degree or advanced certificate represents entry to rewarding careers. However, nearly half of all students who do complete high school and go to college require remedial courses and nearly half never graduate.

The New York City Department of Education (DOE) – the nation's largest school system, comprising 32 school districts (see Exhibit) – served approximately 900,000 students at its more than 1,500 elementary, middle, and high schools (excludes charter schools/students) in the 2021-22 school year. Over the past several years, DOE has reported increases in the percentage of students graduating from its high schools, yet the percentage of students whom it has determined to be college ready has continuously lagged. For example, in 2019, while 77.3% of high school students citywide graduated, only 57% were considered college ready. Similar percentages occurred in 2018 and 2017.

There are a number of definitions of college readiness. In general, college readiness refers to the set of skills, behaviors, and knowledge a high school student should have before enrollment in their first year of college. At the core of the different definitions of college readiness are assessments of students' proficiency levels in English (reading and writing) and Math.

Being college ready helps students be better prepared for the post-secondary pathway they pursue after graduating high school – whether they decide to enroll in college, get a job, pursue a trade, or enlist in the military, for example – and can result in better opportunities and access to careers that provide sustainable wages.

While DOE officials explained there are no legal or regulatory definitions that speak specifically to college readiness, DOE has developed its own definition for college readiness – a student who:

- (1) can successfully meet DOE's criteria for graduation from high school and obtain the highest possible diploma/credential;
- (2) can make an informed decision about immediate next steps after high school;
- (3) is able to enter a post-secondary pathway without the need for remedial instruction/training; and
- (4) persists through a post-secondary pathway that leads to a degree, credential, and/or employment providing family-sustaining wages.

With the onset of the COVID-19 pandemic in March 2020, schools had to shift from in-person learning to remote learning. Due to the disruptions in teaching and learning, assessment exams used to determine proficiency levels – a major aspect of college readiness – were canceled, allowing students to graduate without taking the exams. In turn, this made it easier for students to graduate although they may not have been college ready. Subsequently, DOE reported increased graduation rates – 78.8% in 2020 and 81.2% in 2021. Yet, while the percentage of students graduating is increasing, the trend showing the gap between high school graduation rates and college readiness rates is likely to continue in the foreseeable future.

For purposes of our audit, we selected to review 71,210 students who first entered 9th grade in the 2015-16 school year and were expected to graduate 4 years later, by August 2019 (referred to as a cohort). Additionally, we included students who enrolled in the high schools in our cohort after that date and were also expected to graduate by August 2019. We looked at how this cohort fared overall in terms of high school graduation rates, enrollment in college, and persistence in college (still attending) for 6 months after enrolling. Then, for a sample of 291 students from this cohort, we sought to determine whether they were college ready by DOE's definition. In addition, for the sampled students, we looked at their proficiency levels from as far back as the 3rd grade and whether they persisted in college for at least 18 months after enrolling (through May 2021).

Key Findings

We found DOE should do more to prepare students to be college ready regardless of the post-secondary pathway they decide to take (e.g., enroll in college, get a job, pursue a trade, enlist in the military), and this preparation should begin much earlier in students' school years.

- For the cohort of 71,210 high school students expected to graduate by August 2019, as many as 23% of students did not graduate on time. Further, we found 38% of the students in this cohort did not continue or persist in college for 6 months after enrolling (i.e., 6-month persistence).
- For the sample of 291 students from this cohort, we determined that 45% were not college ready, including students who did not graduate by their expected graduation date as well as students who graduated but did not meet proficiency standards.
- Our review of the 3rd through 8th grade assessments for the 291 students in our cohort sample found that students experienced a significant drop in proficiency in both English and Math between elementary school and middle school.
- For the students in our sample who graduated from high school, 38 did not meet all the minimum scores required to earn the diploma they received. For example, one student was awarded a Regents diploma but should have been awarded a Local diploma.

Key Recommendations

- Assess and provide support to school districts with a high percentage of students who did not graduate or persist in college.
- Evaluate the reasons behind the significant number of students who were assessed as not college ready, and use the information to assist students and schools in improving proficiency levels.
- Develop a system to analyze annual State assessment test results as early as elementary and middle school to identify students who may need additional help to become college ready.
- Develop and implement controls to ensure students are awarded the appropriate type of diploma.



Office of the New York State Comptroller
Division of State Government Accountability

October 4, 2022

David C. Banks
Chancellor
New York City Department of Education
52 Chambers Street
New York, NY 10007

Dear Chancellor Banks:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for the tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit of the New York City Department of Education entitled *College Readiness*. This audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article III of the General Municipal Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

Division of State Government Accountability

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Glossary of Terms

Term	Description	Identifier
Cohort	Group of students who entered 9th grade in September of the 2015-16 school year and who were expected to graduate high school by August 2019	<i>Key Term</i>
College Readiness Index	Metric used by DOE to measure students who graduate on time and are proficient in English and Math	<i>Key Term</i>
College ready or college readiness	Set of skills, behaviors, and knowledge a high school student should have before enrollment in their first year of college	<i>Key Term</i>
CUNY	City University of New York	<i>Agency</i>
DOE	New York City Department of Education	<i>Auditee</i>
ELA	English Language Arts	<i>Key Term</i>
ELL	English Language Learner	<i>Key Term</i>
OPSR	DOE Office of Post-Secondary Readiness	<i>Office</i>
Regents	Regent Examinations taken by high school students	<i>Examination</i>
SED	State Education Department	<i>Agency</i>

Background

According to the U.S. Department of Education, three-quarters of the fastest-growing occupations require education beyond a high school diploma – a college degree or advanced certificate represents entry to rewarding careers. However, nearly half of all students who complete high school and go to college require remedial courses and nearly half never graduate.

The New York City Department of Education (DOE) – the nation’s largest school system, comprising 32 school districts (see Exhibit) – served approximately 900,000 students at its more than 1,500 elementary, middle, and high schools (excludes charter schools/students) in the 2021-22 school year.

Over the past several years, DOE has reported increases in the percentage of students graduating from its high schools, yet the percentage of students whom it determined to be college ready has continuously lagged. For example, in 2019, while 77.3% of high school students citywide graduated, only 57% were considered college ready. Similar percentages occurred in 2018 and 2017 (see Table 1).

Table 1 – DOE Data on High School Graduation and College Readiness Rates

Year	High School Graduation Rate	College Readiness Rate*
2021	81.2%	—
2020	78.8%	—
2019	77.3%	57%
2018	75.9%	51%
2017	74.3%	47%

*According to DOE, rates are not available for 2020 and 2021 due to the COVID-19 pandemic.

There are a number of definitions of college readiness (e.g., college ready) in the education sector. In general, college readiness refers to the set of skills, behaviors, and knowledge a high school student should have before enrollment in their first year of college as well as the ability of the high school student to demonstrate the knowledge and skills required to successfully complete freshman-level college coursework. At the core of the different definitions of college readiness are assessments of students’ proficiency levels in English¹ (reading and writing) and Math.

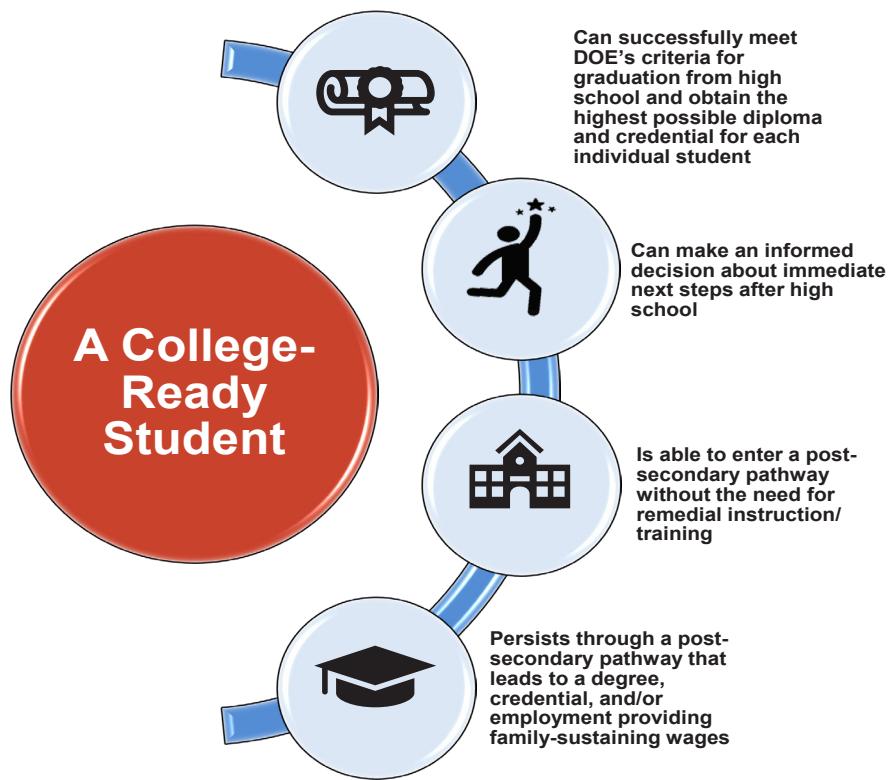
Being college ready helps students be better prepared for the post-secondary pathway they pursue after graduating high school – whether they decide to enroll in college, pursue a trade, get a job, enroll in the military – which can result in better opportunities and access to careers that provide sustainable wages. For those students who pursue obtaining a college degree, being college ready ensures they

¹ Throughout this report, English, English Language Arts (ELA), and reading and writing are used interchangeably.

are better prepared for a successful college experience, improving their chances of persisting in college and completing a college degree.

While DOE officials explained there are no legal or regulatory definitions that speak specifically to college readiness, DOE has developed its own definition for college readiness – a student who: (1) can successfully meet DOE's criteria for graduation from high school and obtain the highest possible diploma/credential; (2) can make an informed decision about immediate next steps after high school; (3) is able to enter a post-secondary pathway without the need for remedial instruction/training; and (4) persists through a post-secondary pathway that leads to a degree, credential, and/or employment providing family-sustaining wages (see Figure 1).

Figure 1 – College Readiness - DOE Definition



Along with DOE's definition of a college-ready student, its Office of Post-Secondary Readiness (OPSR) has established a College Readiness Index. The mission of OPSR is to ensure that every student will be equipped with the knowledge, skills, and competencies to graduate high school and successfully pursue a rigorous post-secondary pathway that meets their interests and needs. This may include going to college and getting a degree, learning a trade and receiving certification, and/or gaining employment that provides family-sustaining wages. This College Readiness Index, along with other information about the quality of individual high schools, is displayed on DOE's website and shows the percentage of students (citywide and at each high school) who met DOE student achievement measures.

With the onset of the COVID-19 pandemic in March 2020, schools had to shift from in-person learning to remote learning. Due to the disruptions in teaching and learning, officials at the State Education Department (SED) canceled the Regents Examinations (Regents) – proficiency tests that New York students are required to take, which are used, in part, to determine college readiness – thereby allowing students to graduate without taking the exams. In turn, this made it easier for students to graduate although they may not have been college ready. Subsequently, as shown in Table 1 above, DOE reported a graduation rate of 78.8% in 2020 and 81.2% in 2021 – increases of approximately 2% each year. Thus, while the percentage of students graduating is increasing, the trend showing the lag between high school graduation rates and college readiness rates is likely to continue in the foreseeable future.

For purposes of our audit, we selected to review 71,210 students who first entered 9th grade in the 2015-16 school year and were expected to graduate 4 years later, by August 2019 (referred to as a cohort). Additionally, we included students who enrolled in the high schools in our cohort after that date and were also expected to graduate by August 2019. We analyzed data to determine how this cohort fared overall in terms of high school graduation, enrollment in college, and their persistence in college (still attending) 6 months after enrolling. Then, for a sample of 291 students from this cohort, we sought to determine whether they were college ready according to DOE's definition. In addition, for the sampled students, we looked at their proficiency levels from as far back as the 3rd grade and whether they persisted in college for 18 months after enrolling.

Audit Findings and Recommendations

DOE should do more to help students gain the proficiency levels needed to enroll and persist in a post-secondary institution, and this preparation should begin much earlier in students' school years.

Analysis of the 71,210 students in our cohort showed that as many as 23% did not graduate by their August 2019 expected graduation date. Additionally, 38% of the cohort did not persist through 6 months in college after enrolling. We also identified disparities in levels of college readiness, pursuit of a post-secondary pathway that included college, and outcomes post-graduation. Further, 80% of students who didn't graduate were Hispanic (50%) and Black (30%).

Our analysis of the sample of 291 students determined 45% were not college ready. This 45% included 75 students who did not graduate by their expected graduation date as well as 56 students who graduated but did not meet proficiency standards. We also found that students in our sample did not meet proficiency levels or experienced a significant drop in proficiency in both English and Math between elementary school and middle school. DOE had the opportunity in the years leading up to high school to identify and assist those students who needed extra support had it used its data more effectively. This could improve students' proficiencies in subjects such as English and Math to better prepare them for college upon graduating high school and reduce the need for remedial instruction.

Finally, we found that students were not always granted the correct type of diploma, with some receiving less advanced diplomas than they were eligible for. Conversely, some students received more advanced diplomas than they were eligible for, which could result in the need for unexpected remedial instruction if they attended college.

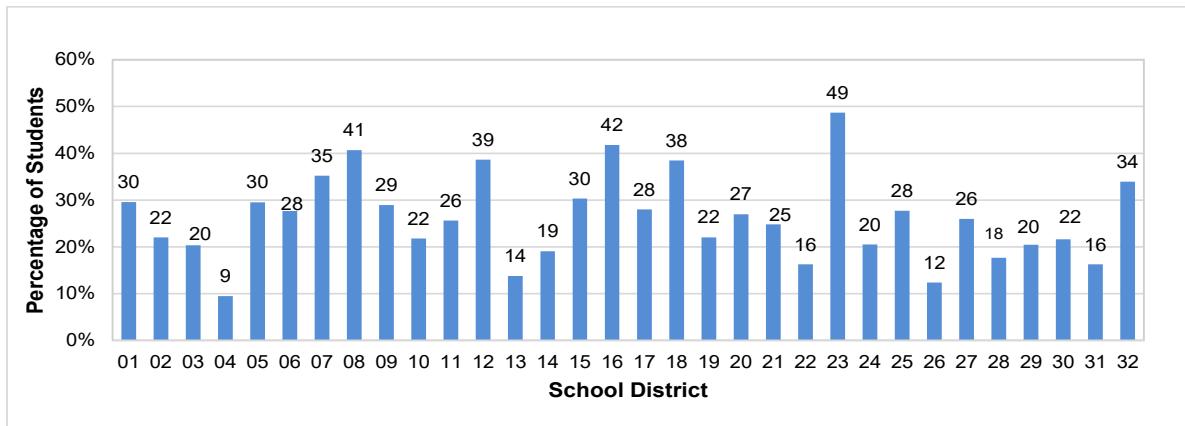
Cohort – College Readiness

To determine DOE's success in preparing students for a post-secondary institution, for our cohort of 71,210 students expected to graduate by August 2019, we reviewed their graduation rates, college enrollment rates, and persistence in a post-secondary institution. This cohort included 28,115 Hispanic students (39%), 18,722 Black students (26%), 12,762 Asian/Pacific Islander students (18%), 10,052 White students (14%), and 1,559 students of other ethnicities (3%). The cohort also included 11,207 English Language Learner (ELL) students.

Graduation Rates

We found that, of the 71,210 students in our cohort, 16,732 (23%) did not graduate as of their expected graduation date. The percentage of students who did not graduate varied widely among school districts, ranging from a low of 9% in District 4, which includes East Harlem and South/North areas of Manhattan, to a high of 49% in District 23 in the Ocean Hill and Brownsville areas of Brooklyn (see Figure 2). See Exhibit for a listing of neighborhoods in each school district.

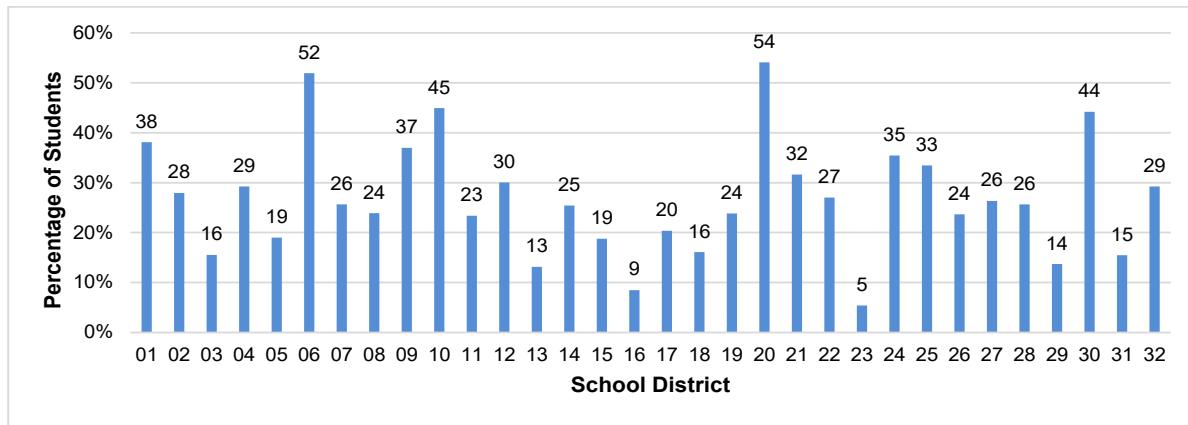
Figure 2 – Students Who Did Not Graduate by Their Expected Graduation Date, by School District



We also noted a disparity in the ethnic composition of the students in the cohort who did not graduate by their expected graduation date. Of these 16,732 students, 8,274 (50%) were Hispanic and 5,097 (30%) were Black, collectively making up 80% of this population. Asian, White, and all other ethnicities made up the remaining 20% (3,361).

Further analysis of the students who didn't graduate by their expected graduation date found that 29% (4,825 of 16,732) were ELL students. The highest percentage of ELL students who did not graduate – ranging from 44% to 54% – attended schools in four districts: District 30, including the Astoria and Jackson Heights sections of Queens; District 10, including the Fordham and University Heights sections of the Bronx; District 6, including the Manhattanville and Washington Heights sections of Manhattan; and District 20, including the Bay Ridge and Borough Park sections of Brooklyn (see Figure 3).

Figure 3 – ELL Students Who Did Not Graduate by Their Expected Graduation Date, by School District



College Enrollment and Persistence

Two other aspects of DOE's college readiness definition are that college-ready students can make an informed decision about immediate next steps after high school and persist through a post-secondary pathway, including the option to enroll and persist in college. DOE measures only 18-month college persistence, which it defines as the number of students who graduated, enrolled, and remained in college for 18 months within 6 years of starting high school.

However, for the cohort of 71,210 students, we measured 6-month persistence. Of the 71,210 students in the cohort who were expected to graduate by August 2019, 44,835 students (63%) graduated and enrolled in college. To determine the 6-month persistence rate, we removed those students who graduated and pursued an alternate post-secondary pathway (e.g., got a job, pursued a trade, enlisted in the military) and measured against the remaining students in our cohort (see Table 2). We found that 38% of students did not persist for at least 6 months.

We believe that measuring the persistence of students at 6 months provides valuable information on the capabilities of students upon graduation from high school. We did, however, also measure 18-month persistence for our sample of 291 students, discussed later in the report.

Table 2 – Cohort’s Graduation, Enrollment, and Persistence Status, by School District

School District	Number of Students in Cohort	Number Who Didn’t Graduate High School (A)	Number Who Graduated and Enrolled in College (B)	Number Who Did Not Persist Thru 6 Months of College (C)	Percent Who Did Not Persist Thru 6 Months of College (A+C)/(A+B)
1	968	286	586	81	42%
2	8,595	1,890	5,720	787	35%
3	2,277	463	1,496	117	30%
4	865	82	664	77	21%
5	837	247	493	52	40%
6	1,296	358	762	136	44%
7	1,727	608	847	168	53%
8	1,865	758	831	162	58%
9	2,038	590	1,152	197	45%
10	3,789	826	2,445	331	35%
11	2,186	560	1,192	230	45%
12	1,525	589	674	127	57%
13	2,706	373	2,034	184	23%
14	1,464	279	876	150	37%
15	1,526	463	877	138	45%
16	450	188	141	28	66%
17	1,805	505	1,031	203	46%
18	1,147	441	511	88	56%
19	1,180	260	597	124	45%
20	3,168	854	1,987	182	36%
21	2,808	696	1,777	210	37%
22	2,481	403	1,902	145	24%
23	417	203	145	35	68%
24	3,360	688	2,253	586	43%
25	2,586	717	1,601	179	39%
26	3,422	423	2,679	311	24%
27	2,556	664	1,464	338	47%
28	3,729	659	2,671	419	32%
29	1,072	219	639	128	40%
30	2,478	536	1,628	302	39%
31	4,262	692	2,898	300	28%
32	625	212	262	67	59%
Totals	71,210	16,732	44,835	6,582	38%

Note: See Exhibit for a listing of neighborhoods in each school district.

Cohort Sample – College Readiness

Graduating from high school and/or enrolling in college doesn't mean a student is college ready. To determine DOE's success in preparing students to be college ready, we selected a sample of 291 students from our cohort to determine whether they were college ready, using DOE's four-part definition. We also looked at how this sample of students fared in elementary and middle school, which could be an early indicator, or precursor, of how they would do in high school.

View our interactive [College Readiness Map](#), which segments DOE's School Quality Report data by district to show the percentage of high school students in our cohort sample who graduated as well as the percentage of students that DOE determined to be college ready.

Graduation Rates

According to DOE's definition, one aspect of college readiness is whether students successfully meet DOE's criteria for graduation from high school and obtain the highest possible diploma and/credential. Our analysis found that 75 of the 291 students (26%) in our sample did not graduate by their expected graduation date.

College Enrollment

Another aspect of DOE's definition of college ready is students making an informed decision about immediate next steps after high school. From our cohort sample, we reviewed those students who chose to enroll in college after graduation from high school. Of the 216 students (291 - 75) who graduated high school, 176 (81%) enrolled in college after graduating high school.

Proficiency Level in High School – Need for Remedial Courses

A third aspect of DOE's definition of college ready is students being able to enter college without the need for remedial instruction/courses. Thus, just graduating from high school (and/or enrolling in college) does not mean a student is college ready. DOE's determination whether the student will need to take remedial courses in college is based on proficiency standards established by the City University of New York (CUNY) and adopted by DOE, requiring students to demonstrate proficiency (meeting benchmark scores on assessment exams) in English and Math without the need to take remedial courses. CUNY is the nation's leading urban public university and serves more than 275,000 degree-seeking students, including about 60% who graduated from DOE high schools.

In New York, the Regents are statewide standardized examinations in core high school subjects, including English and Math, that students are required to pass in order to graduate and receive a high school diploma. Scores on Regents are also

used to determine whether a student has met educational standards and is thus “proficient” in the given subject(s). If students are proficient, they are less likely to need remedial instruction, or its equivalent, in college.

College entrance exams, such as the SAT and ACT, are standardized tests taken by high school students to measure their proficiency and readiness for college. These tests provide colleges with common data points that can be used to compare applicants for college admissions.

CUNY has established benchmark scores on Regents and SAT/ACT exams that indicate whether students are proficient and, therefore, less likely to need remedial courses in college. Our analysis found that, of the 216 students in our cohort sample who graduated from high school, 56 (26%) did not meet the benchmark scores on either their Regents or SAT/ACT exams and thus are deemed not proficient in one or both subjects.

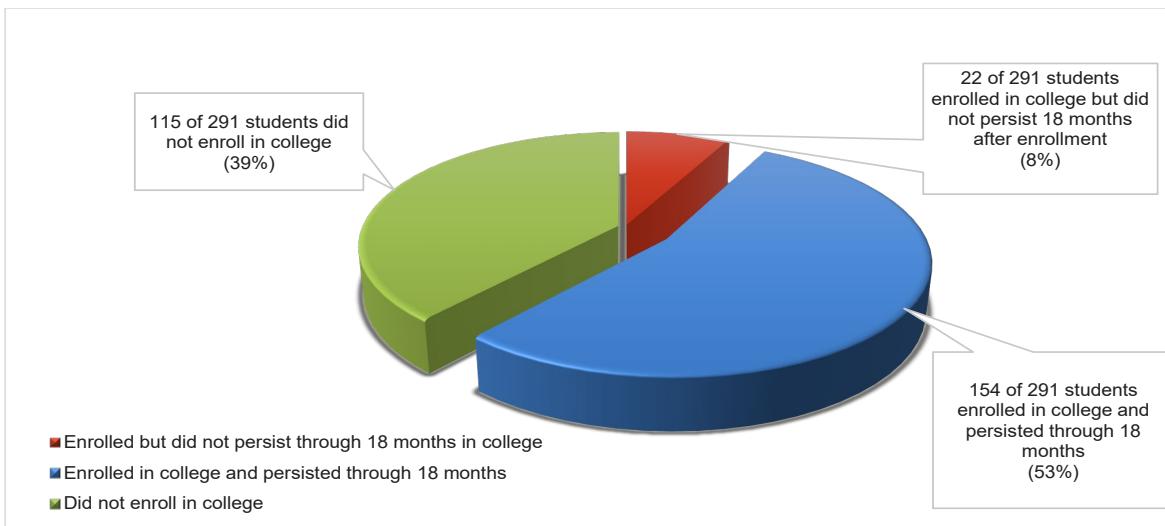
Consequently, for the 291 students in our sample, we determined that 131 (45%) were not college ready as they either did not graduate by their expected date (75) or were not proficient (56) based on their scores on the Regents, SAT, or ACT exams.

College Persistence

A fourth aspect of DOE’s definition of college readiness is whether a student persists through a post-secondary pathway that leads to a degree, credential, and/or employment providing family-sustaining wages. We looked at 18-month college persistence for our cohort sample, which DOE defines as the number of students who graduated, enrolled, and remained in college for 18 months within 6 years of starting high school.

Of the 216 students in our cohort sample who graduated from high school, 176 enrolled in college – and of these, 22 students did not persist through 18 months and 154 students persisted at least through the 18-month period (see Figure 4). Given that 26% of the students who graduated were deemed to be not college ready, as noted previously, students who enrolled and persisted in college may have had to take remedial courses.

Figure 4 – Post-Secondary and 18-Month Persistence Status



Proficiency Levels Prior to High School

Academic preparation for success in a post-secondary pathway, including in college, does not just take place during a student's 4 years in high school. In accordance with federal and State regulations, students in grades 3–8 are required to take a yearly State assessment in ELA and Math. The tests are designed to measure how well students are mastering learning standards that guide classroom instruction and help to ensure students are on track to graduate high school with the skills needed for success in college and the workplace. Students in each grade are assessed on the skills and knowledge necessary to meet common core standards, and are classified into one of four proficiency categories based on the test scores:

- Level 1 Proficiency – Student is below proficiency in standards
- Level 2 Proficiency – Student is partially proficient in standards
- Level 3 Proficiency – Student is proficient in standards
- Level 4 Proficiency – Student excels in standards

For our analysis, we considered levels 1 and 2 as not proficient and levels 3 and 4 as proficient.

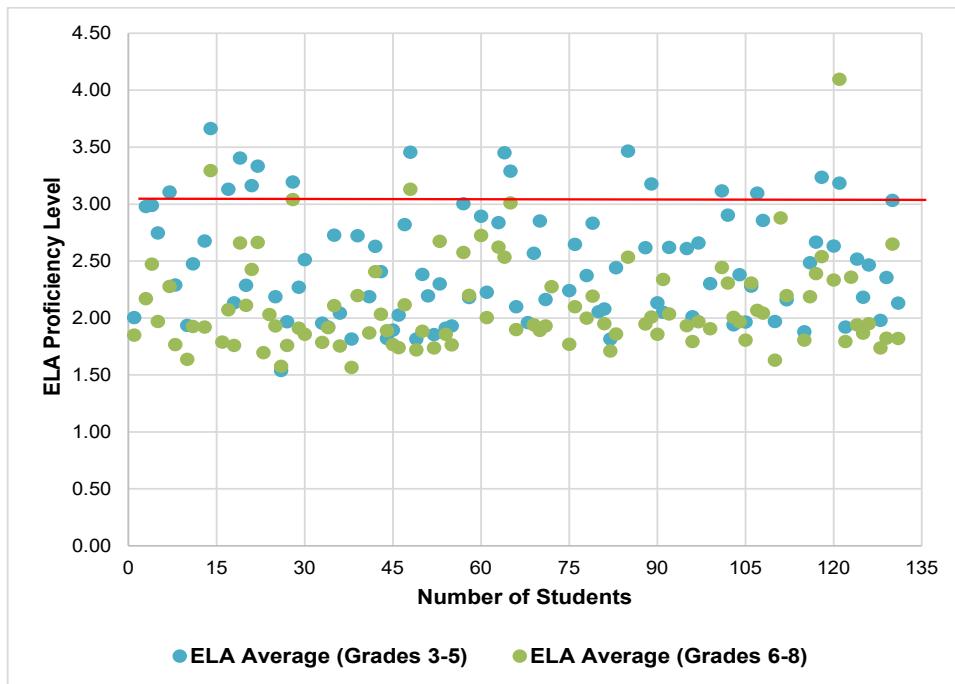
We reviewed the test scores that were available for students from our cohort sample to analyze their English and Math State proficiency levels in grades 3–5 (elementary school) and grades 6–8 (middle school) – the years prior to reaching high school.

Students Who Were Deemed Not College Ready

The vast majority of the 131 students in our cohort sample whom we determined to be not college ready were also not proficient in ELA and/or Math in elementary school and middle school, according to their State assessment test results.

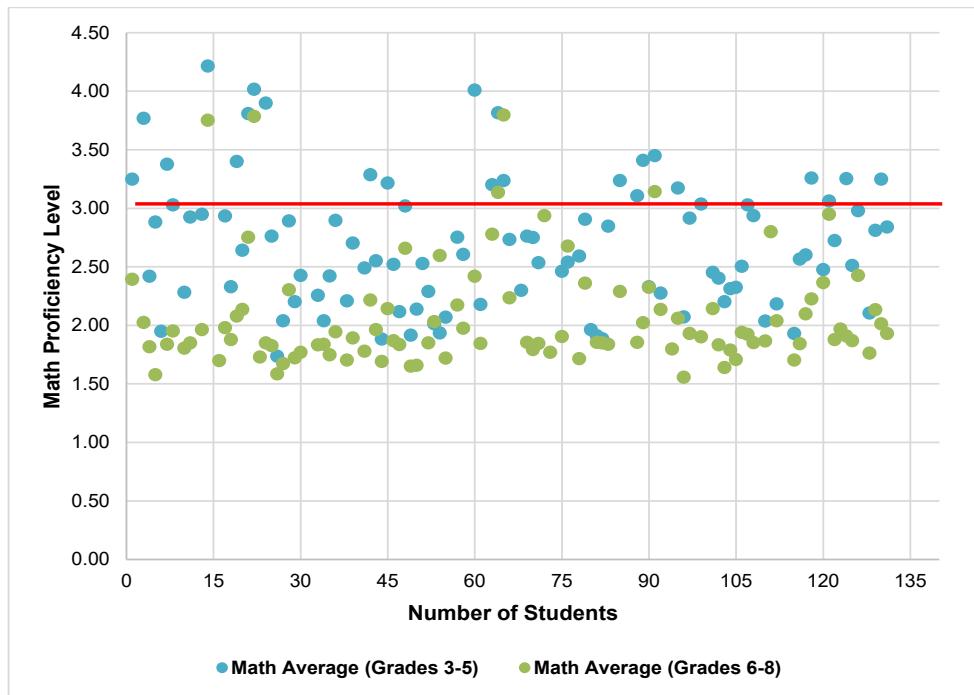
For the students for whom we had test results from elementary school, 81% were not proficient (below the red line) in ELA. The remaining 19% tested at or above the proficiency level. Subsequently, for the students for whom we had test results from middle school, the percentage of students who were proficient significantly decreased to just 5%, and the percentage of students who were not proficient increased to 95% (see Figure 5).

Figure 5 – ELA Proficiency for Students Deemed Not College Ready



Similarly, there was a significant decrease in students' proficiency in Math between elementary and middle school. For the students for whom we had test results from elementary school, 73% were not proficient in Math. The remaining 27% tested at or above the proficiency level. Subsequently, for the students for whom we had test results from middle school, the percentage of students who were not proficient increased to 95%, while just 5% tested as proficient (see Figure 6).

Figure 6 – Math Proficiency for Students Deemed Not College Ready



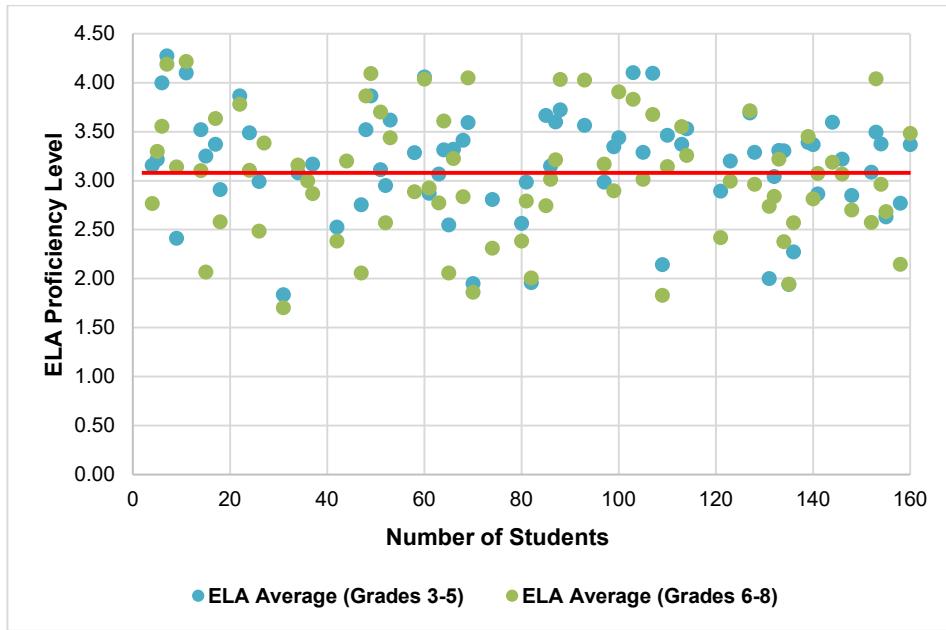
In both subjects, all but five students dropped below the proficiency level between elementary and middle school. Additionally, the majority of students who were not proficient in either subject in elementary school remained so in middle school.

Students Who Were Deemed College Ready

The majority of the 160 students in our cohort sample who were deemed to be college ready tested as proficient in English and Math in both elementary school and middle school, according to their State assessment tests from grades 3 through 8. However, there was a significant decrease in the number of students who tested as proficient between elementary school and middle school.

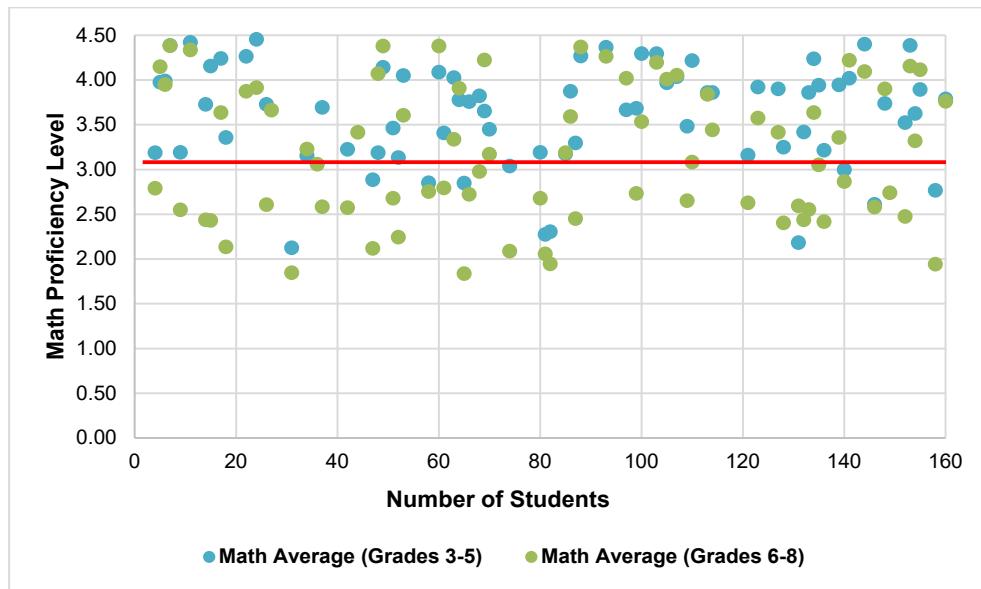
For the students for whom we had test results from elementary school, 35% were not proficient in English. The remaining 65% tested at or above the proficiency level. Subsequently, for the students for whom we had test results from middle school, the percentage of students who were not proficient increased to 48%, while the students who tested as proficient decreased to 52% (see Figure 7).

Figure 7 – ELA Proficiency for Students Deemed College Ready



Similarly, there was a significant drop in students' proficiency in Math between elementary and middle school. For the students for whom we had test results from elementary school, 15% were not proficient in Math. The remaining 85% tested at or above the proficiency level. Subsequently, for the students for whom we had test results from middle school, the percentage of students who were not proficient increased to 46%, while the students who tested as proficient decreased to 54% (see Figure 8).

Figure 8 – Math Proficiency for Students Deemed College Ready



DOE had the opportunity in the years leading up to high school to identify and assist those students who needed extra support. Not only is it important to look at what happened during this time to cause such significant drops in proficiency levels, but it is critically important to provide students with the support they need at this point during their schooling rather than waiting until high school. DOE could have used these assessment scores as an entry point to determine what was happening and what could be done to address students' needs.

Diplomas Obtained

As indicated by DOE in its definition of college readiness, one of the criteria for being deemed college ready is to graduate from high school and obtain the highest possible diploma. The requirements for the type of diploma received are based on the number of Regents exams taken, subject, and scores earned. Following are the three types of diplomas students can earn and the requirements for each:

- Local diploma: Students must pass five Regents with scores of 55 or higher
- Regents diploma: Students must pass five Regents with scores of 65 or higher
- Advanced Regents diploma: Students must pass nine Regents with scores of 65 or higher

Students also can earn diploma endorsements for the successful completion of additional courses and exams. For example, if a student passes all the required Regents exams with an average score of 90 or higher, they will earn an Advanced Regents diploma with Honors designation.

We found that students were not always granted the correct type of diploma, with some receiving less advanced diplomas than they were eligible for. Conversely, some students received more advanced diplomas than they were eligible for, which could result in the need for unexpected remedial instruction if they attended college.

Of the 291 students in our sample who graduated, 38 (13%) did not meet all the minimum scores required to earn the diploma they received. When we brought this to DOE's attention, officials acknowledged that for four of these students the diploma type awarded was a mistake on their part. For example, one student was awarded a Regents diploma but should have been awarded a Local diploma.

Students can appeal, request a waiver, or use other alternatives to graduate with a lower score and still receive a diploma despite not meeting the diploma requirements. The remaining 34 students in our cohort sample fell into these categories. Our review also found that 32 of the 38 students are those who we determined were (among the 131) not college ready.

Recommendations

1. Assess and provide support to school districts with a high percentage of students who did not graduate or persist in college.
2. Evaluate the reasons behind the significant number of students who were assessed as not college ready, and use the information to assist students and schools in improving proficiency levels.
3. Develop a system to analyze annual State assessment test results as early as elementary and middle school to identify students who may need additional help to become college ready.
4. Develop and implement controls to ensure students are awarded the appropriate type of diploma.

Audit Scope, Objective, and Methodology

The objective of our audit was to determine whether DOE is adequately preparing students for post-secondary institutions. Our audit scope covered the period September 2015 through March 2022 and included students who were expected to graduate high school by August 2019.

To accomplish our objective and assess internal controls related to our audit objective, we reviewed relevant laws, regulations, and DOE guidance. We interviewed key DOE personnel and officials from individual high schools to gain an understanding of their policies and practices related to college readiness. We also interviewed officials from SED and CUNY to discuss various aspects of college readiness and guidance they provide to DOE. Additionally, we met with researchers from New York University Steinhardt to discuss research they conducted on DOE students and college readiness. We analyzed data provided by DOE, which showed the status of 71,210 students in the cohort – who first entered 9th grade in the 2015-16 school year (or enrolled in high school after that date) and were expected to graduate by August 2019. For a random sample of 291 students from this cohort, we reviewed data including high school graduation, transcripts, college enrollment, and 18-month college persistence data. We also looked at available standardized tests scores for 3rd–8th grade ELA and Math State assessments, Regents, and the SAT and ACT. This sample was not projected or intended to be projected across the population. We determined that the data used to pull our sample and perform our analysis was sufficiently reliable for our use in accomplishing our audit objective.

As part of audit procedures, the audit team used Geographic Information Systems (GIS) software for geographic analysis. Portions of the maps contained in this report include the intellectual property of Esri and its licensors and are used under license. Copyright © 1987-2020 Esri and its licensors. All rights reserved.

Statutory Requirements

Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article III of the General Municipal Law.

We conducted our audit in accordance with generally accepted government auditing standards. These 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.

As is our practice, we notify agency officials at the outset of each audit that we will be requesting a representation letter in which agency management provides assurances, to the best of their knowledge, concerning the relevance, accuracy, and competence of the evidence provided to the auditors during the audit. The representation letter is intended to confirm oral representations made to the auditors and to reduce the likelihood of misunderstandings. Agency officials normally use the representation letter to affirm that, to the best of their knowledge, all relevant financial and programmatic records and related data have been provided to the auditors. They further affirm either that the agency has complied with all laws, rules, and regulations applicable to its operations that would have a significant effect on the operating practices being audited, or that any exceptions have been disclosed to the auditors. However, officials at the New York City Mayor's Office of Operations informed us that, as a matter of policy, mayoral agencies do not provide representation letters in connection with our audits. As a result, we lack assurance from DOE officials that all relevant information was provided to us during the audit.

Reporting Requirements

A draft copy of this report was provided to DOE officials for their review and formal comment. Their comments were considered in preparing this final report and are attached in their entirety at the end of it. DOE officials generally agreed with the report's recommendations and indicated actions they have taken or will take to implement them. We address certain of their remarks in our State Comptroller's Comments, which are embedded within DOE's response.

Within 180 days of 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 herein, and where recommendations were not implemented, the reasons why.

Exhibit

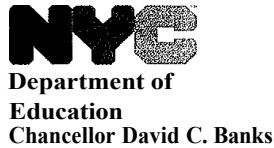
List of DOE School Districts, by Borough*

District	Location/Neighborhood
Manhattan	
1	East Village, Lower East Side, Chinatown
2	Chinatown, Battery Park, SoHo, Tribeca, West Village, Chelsea, Flatiron, Union Square, Gramercy Park, Stuyvesant Town, Cooper Village, Murray Hill, Kips Bay, Midtown South, Clinton, Turtle Bay, East Midtown, Lenox Hill, Upper East Side, Carnegie Hill, Yorkville
3	Morningside Heights, Central Harlem South, Upper West Side, Lincoln Square
4	East Harlem South, East Harlem North
5	Manhattanville, Morningside Heights, Central Harlem North, Polo Grounds, East Harlem South
6	Manhattanville, Hamilton Heights, Washington Heights South, Washington Heights North, Marble Hill, Inwood
Bronx	
7	Hunts Point, Mott Haven, Port Morris, Longwood, Melrose South, Mott Haven North, Morrisania, Melrose, East Concourse, West Concourse, Rikers Island
8	Morrisania, Melrose, Longwood, Hunts Point, Soundview, Bruckner, Castle Hill, Clason Point, Port Harding Park, Westchester, Unionport, Schuylerville, Throgs Neck, Edgewater Park, Pelham Bay, Country Club, City Island
9	Morrisania, Highbridge, Morris Heights, Tremont, Mount Hope, East Concourse, West Concourse, Claremont, Bathgate
10	Belmont, Claremont, Bathgate, Mount Hope, University Heights, Morris Heights, Fordham South, Kingsbridge Heights, Bedford Park, Fordham North, Van Cortlandt Village, Norwood, Spuyten Duyvil, North Riverdale, Fieldston, Riverdale
11	Parkchester, Westchester, Van Nest, Morris Park, Baychester, Williamsbridge, City Island, Eastchester, Wakefield, Woodlawn, Pelham Parkway, Allerton, Pelham Gardens, Bronxdale, Co-Op City
12	East Tremont, West Farms-Bronx River, Parkchester, Crotona Park East, Soundview-Bruckner, Longwood, Hunts Point, Morrisania-Melrose
Brooklyn	
13	Brooklyn Heights-Cobble Hill-Dumbo-Downtown Brooklyn, Fort Greene, Clinton Hill, Bedford, Prospect Hill
14	Williamsburg, East Williamsburg, Bedford, Bushwick South, North Side-South Side, Greenpoint
15	Carroll Gardens, Columbia, Red Hook, Dumbo-Downtown Brooklyn, Park Slope-Gowanus, Sunset Park West, Sunset Park East, Borough Park, Windsor Terrace, Kensington-Ocean Parkway
16	Stuyvesant Heights, Crown Heights North
17	Crown Heights North, Crown Heights South, Prospect-Lefferts Gardens-Wingate, Erasmus
18	East Flatbush, Farragut, Rugby-Remsen Village, Canarsie, Flatlands, East New York
19	East New York, Bushwick South, Cypress Hill-City Line, Starrett City

20	Bay Ridge, Kensington-Ocean Parkway, Borough Park, Sunset Park West, Sunset Park East, Bensonhurst West, Bath Beach, Dyker Heights
21	Midwood, Ocean Parkway South, Bensonhurst East, Gravesend, Homecrest, Brighton Beach, West Brighton, Sea Gate-Coney Island
22	Midwood, Flatbush East, Flatbush, Flatlands, Madison, Sheepshead Bay, Gerritsen Beach, Georgetown, Marine Park, Bergen Beach, Mill Basin
23	Ocean Hill, Brownsville
32	Bushwick North, Bushwick South
Queens	
24	Sunnyside-Woodside, Ridgewood, Middle Village, Glendale, Elmhurst-Maspeth, Elmhurst, Corona
25	Fort Totten-Bay Terrace-Clearview, Murray Hill, Whitestone, College Point, Fresh Meadows-Utopia, Jamaica Estates-Holliswood, Flushing, East Flushing, Queensboro Hill, Pomonok-Flushing Heights-Hillcrest, Kew Gardens
26	Pomonok-Flushing Heights-Hillcrest, Auburndale, Fresh Meadows-Utopia, Bayside-Bayside Hills, Oakland Gardens, Jamaica Estates-Holliswood, Queens Village, Bellerose, Glen Oaks, Floral Park-New Hyde Park, Douglas Manor, Douglaston, Little Neck
27	Woodhaven, Ozone Park, Lindenwood-Howard Beach, Richmond Hill, South Ozone Park, Baisley Park, Springfield Gardens North, Far Rockaway-Bayswater, Hammels-Arverne-Edgemere, Breezy Point-Belle Harbor-Rockaway Park
28	Rego Park, Forest Hills, Briarwood-Jamaica Hill, Jamaica, Jamaica Estates-Holliswood, South Jamaica, St. Albans
29	Jamaica Estates-Holliswood, Pomonok-Flushing Heights-Hillcrest, Jamaica, South Jamaica, St. Albans, Queens Village, Springfield Gardens South-Brookville, Rosedale, Laurelton, Cambria Heights
30	Astoria, East Elmhurst, Jackson Heights, Woodside, Hunters Point-Sunnyside-Maspeth, Queensbridge-Ravenwood-Long Island City, Old Astoria, Ditmars-Steinway
Staten Island	
31	Charleston-Richmond Valley-Tottenville, Annadale-Huguenot, Prince's Bay, Eltingville, Great Kills, Rossville-Woodrow, Arden Heights, Oakwood, Todt Hill-Emerson Hill-Heartland Village-Lighthouse Hill, New Dorp-Midland Beach, Old Town-Dongan Hills-South Beach, Grasmere-Arrochar-Fort Wadsworth, Stapleton-Rosebank, West New Brighton, New Brighton-St. George, New Brighton-Silver Lake, Westerleigh, Port Richmond, Mariners Harbor-Graniteville, New Springville-Travis-Bloomfield, Grymes Hill-Clifton-Fox Hill

*This data is compiled from DOE's website district map. It excludes the two citywide districts: 75 and 79.

Agency Comments and State Comptroller's Comments



Daniel Weisberg
First Deputy Chancellor

August 19, 2022

Mr. Thomas P. DiNapoli, State Comptroller
Office of the New York State Comptroller
Division of State Government Accountability
110 State Street, 11th floor Albany, NY 12236

Re: College Readiness: New York City Department of Education - 2021-N-1

Dear State Comptroller DiNapoli,

This letter will constitute as the New York City Department of Education's (DOE) formal response to the Office of the New York State Comptroller's (Comptroller) draft audit report on College Readiness: New York City Department of Education (Report).

The Report includes an analysis of whether 216 sampled students met graduation requirements (page 20). The Report includes an inaccurate characterization that "38 [students] (18%) did not meet all the minimum scores required to earn the diploma they received." As demonstrated for the auditors, diplomas were awarded in full compliance with New York State graduation policies for 34 of these students. For four students, the auditors pointed to these students being eligible for a different diploma type/endorsement than what was in the DOE's reporting system; however, as shared with the auditors, every student sampled met the minimum graduation requirements.

State Comptroller's Comment – Our analysis did not look at whether the sampled students met graduation requirements but whether these students met the minimum scores required for the type of diploma they received (Local, Regents, Advanced Regents), which is based on the number of Regents exams taken, subjects, and scores. We found that for 34 of these 38 students, despite receiving below-minimum scores on at least one Regents exam, some were awarded a higher-level diploma and ultimately graduated due to a successful appeal of, or obtaining a waiver for, a lower score. Thus, while these students may have met the minimum graduation requirements, we stand by our finding that these 34 students did not meet minimum scores for the type of diploma received.

Responses to Recommendations

Recommendation 1. *Assess and provide support to school districts with a high percentage of students who did not graduate or persist in college.*

Response. The DOE agrees with the recommendation inasmuch as it reflects our current practices.

We continue to implement the recommendation to assess and provide support for school districts with high percentages of students not persisting in college or a postsecondary pathway. The DOE has analyzed and publicly reported on college readiness for each school in the district via the School Quality Report since 2007. School Quality Report data and other research-based indicators aligned with college readiness and persistence are tracked and used to guide school district improvement plans and make decisions about funding, programming, and school staff capacity-building. For example, in recent years the DOE has implemented programs that include school funding and staff training to support implementation of college advising, advanced coursework (e.g., AP and early college credit), and summer melt prevention through bridge-to-college programming in the months following graduation.

State Comptroller's Comment – While DOE provided us with information it has on college readiness metrics (i.e., graduation and persistence data in its School Quality Reports), DOE has not demonstrated how it then tracks and uses this data to guide school district improvement plans, implement programs, or make other decisions to support schools with a high percentage of students who did not graduate or persist in college. Given that DOE has been analyzing these metrics since 2007 yet the citywide college readiness rate was only 57% for the 2018-19 school year, we believe DOE could be doing more with regard to the data it has in hand. We are pleased that DOE plans to implement programs aimed at improving its citywide college readiness rate.

The DOE is deeply committed to continuing to strengthen students' preparation for postsecondary pathways, including college. Starting in January 2022, incoming Chancellor David Banks set a vision for every New York City public school student to graduate prepared and on a path to rewarding careers aligned with their passion and purpose and offering long-term economic security and a choice-filled life. Aligned with this vision, the DOE is implementing strategies to reimagine the student experience and strengthen college and career readiness including student pathways initiatives, expanded K-12 literacy instruction, and empowering superintendents to strengthen district oversight. Further information on expanded K-12 literacy instruction is detailed in the response to Recommendation 2.

Student pathways initiatives will provide support for schools and districts to implement four priorities to support the DOE's vision: effective college and career awareness and advising to support strong postsecondary plans; expansion of durable college and career readiness skills including digital and financial literacy; acceleration of postsecondary success with early college credits and credentials of value; and building high quality college and career pathways with meaningful work experiences from internships and apprenticeships.

A key strategy the DOE is implementing to improve college and career readiness is expanding superintendents' district teams based on need, increasing superintendent accountability and empowering superintendents with additional resources for effective data-driven district supervision that responds to the unique needs of local communities and ensures school districts with a significant percentage of students who did not persist in college get the support they need to be successful.

Recommendation 2. Evaluate the reasons behind the significant number of students who were assessed as not college ready and use the information to assist students and schools in improving proficiency levels.

Response. The DOE agrees with the recommendation to evaluate the reasons for a significant number of students not graduating college ready and is implementing this recommendation inasmuch as it reflects our current practice.

Since 2007, the DOE has published reports, currently named School Quality Reports, that use statistical methods to isolate the impact of school quality on performance by controlling for incoming factors. These results are used across the DOE to prioritize support for schools and students. School Quality Reports are aligned with the Framework for Great Schools and include student achievement data: progress towards graduation by accumulating credits; graduation rates; college-and-career readiness of students based on their achievements in high school; and their outcomes after leaving high school.

State Comptroller's Comment – We agree that the information in the School Quality Reports has useful college readiness metrics on school performance and can be used to prioritize support for schools and students. However, the information in these reports does not get to the underlying reasons why a significant number of students were assessed as not college ready. We encourage DOE to analyze these underlying reasons in order to fully support students in becoming college ready.

As there are numerous factors in college and career readiness that are well-established in research, as well as a variety of accepted definitions (Xing, Huerta, and Garza), the DOE is initiating a process to revise the standard definition of college and career readiness to update and incorporate the mindsets, knowledge, skills, and experiences that align with the North Star of long-term economic security that Chancellor Banks established. Furthermore, through the student pathways initiatives, the DOE is conducting ongoing analysis of student outcomes in college and career that will be used to inform strategic priorities and allocation of resources to support students and schools.

A key strategy in ensuring that our students are college and career ready is that every student has the literacy skills they need to be successful in the future. During the 2022-23 school year, the NYC Public Schools Literacy Collaborative will seek to build coherence and alignment throughout grades K-12 by establishing literacy expectations and supporting all district and school level stakeholders with the necessary curricular, instructional, supplemental, and assessment resources to increase student outcomes. To accomplish this goal the DOE will continue to implement, with fidelity, a high-quality curriculum for all students, develop a school wide assessment plan that incorporates screening, secondary, diagnostics, and progress monitoring, and incorporate evidence and research-based interventions to meet unique student needs

State Comptroller's Comment – We agree that the information in the School Quality Reports has useful college readiness metrics on school performance and can be used to prioritize support for schools and students. However, the information in these reports does not get to the underlying reasons why a significant number of students were assessed as not college ready. We encourage DOE to analyze these underlying reasons in order to fully support students in becoming college ready.

Recommendation 3. *Develop a system to analyze annual State assessment test results as early as elementary and middle school to identify students who may need additional help to become college ready.*

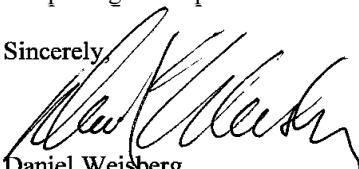
Response. The DOE agrees with the recommendation and has been implementing this recommendation since 2010. Since then, the DOE has annually distributed the Item Skills Analysis reports, which contain detailed information about the state test performance of every student in grades 3-12. Item Skills Analysis reports help schools identify students who would benefit from additional instructional support on specific standards. School staff and district staff use these reports to adjust instruction and intervene with individual students.

State Comptroller's Comment – We were not informed of or provided with Item Skills Analysis reports during the course of our audit; however, we are pleased to hear that DOE prepares and utilizes such reports. We encourage DOE to use this information to provide additional support and intervention for students in need of assistance as far in advance of high school as possible.

Recommendation 4. *Develop and implement controls to ensure students are awarded the appropriate type of diploma.*

Response. The DOE agrees with the recommendation to the extent that it supports principals in understanding the requirements for each diploma type through academic policy guidance, training, and data tools. The requirements for each diploma type are documented in the DOE's High School Academic Policy Guide, which is published annually to all principals. In addition, all principals are required to complete academic policy training each school year as part of the DOE's Compliance Checklist. Lastly, the DOE provides data tools by which principals can assess student progress toward completing the requirements for a local, Regents, or Advanced Regents diploma.

Sincerely,



Daniel Weisberg
First Deputy Chancellor

Contributors to Report

Executive Team

Andrea C. Miller - Executive Deputy Comptroller

Tina Kim - Deputy Comptroller

Ken Shulman - Assistant Comptroller

Audit Team

Kenrick Sifontes - Audit Director

Sheila Jones - Audit Manager

Rita Verma-Kumar - Audit Supervisor

Natalie Sherman - Examiner-in-Charge

Leslie Camargo - Senior Examiner

Oluwabunmi Diji - Senior Examiner

Joseph Maniscalco - Senior Examiner

Andrew Lu - Student Assistant

Timothy Garabedian - Mapping Analyst

Kelly Traynor - Senior Editor

Contact Information

(518) 474-3271

StateGovernmentAccountability@osc.ny.gov

Office of the New York State Comptroller

Division of State Government Accountability

110 State Street, 11th Floor

Albany, NY 12236



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