



Public Comment Analysis

Date: January 31, 2011

Topic: The Proposed Phase-out of I.S. 231 Magnetech 2000 (29Q231)

Date of Panel Vote: February 1, 2011

Summary of Proposal

I.S. 231 Magnetech 2000 (29Q231, “I.S. 231”) is an existing zoned middle school located at 145-00 Springfield Boulevard, Springfield Gardens, NY 11413, in Community School District 29, in Building Q231 (“Q231”). It currently serves students in grades six through eight. An Alternative Learning Center (Q987, “ALC”) is also located at Q231. The New York City Department of Education (“DOE”) is proposing to phase out and eventually close I.S. 231 based on its poor performance and the DOE’s assessment that the school lacks capacity to turn around quickly to better support student needs.

If this phase-out proposal is approved, I.S. 231 would no longer admit sixth-grade students after the conclusion of the 2010-2011 school year. Current students in grades six and seven will continue to be served by I.S. 231 and be supported as they progress toward completion of middle school. Current students in grade eight will be supported in using the High School Admissions Process to select a high school as anticipated. The school will serve one grade less each subsequent year until it completes phasing out in June 2013. In 2011-2012 students in grade six would be served in one of the new zoned middle schools proposed to be opened in Q231, as described in more detail below and proposed in a separate Educational Impact Statement (“EIS”) posted on December 17, 2010 and amended on January 25, 2011. Current fifth graders zoned to I.S. 231 would be accepted to sixth grade based on a campus choice model: all students currently zoned to I.S. 231 would be zoned to the Q231 campus and would be guaranteed a seat in one of the two new schools proposed. These students would use a middle school choice model to apply to the proposed new schools.

In 2009-2010, Q231 had a target capacity to serve 1,226 students. I.S. 231 had a target capacity to serve 1,134 students and enrolled 931 students, yielding a target organizational utilization of 82%, which does not include the ALC. This means that the building was slightly “underutilized” and had extra space to accommodate additional students.

As noted above, in a separate EIS, the DOE has also proposed the siting of two new unscreened, zoned middle schools in Q231, I.S. 355 (29Q355, “I.S. 355”) and I.S. 356 (29Q356, “I.S. 356”), which will both serve grades six through eight when fully phased in.

Summary of Comments Received Prior to the Official Public Comment Period

Certain comments were received during meetings with parents and community members prior to the comment period on this proposal. Although these comments were not received during the comment period, as a courtesy, the DOE wishes to acknowledge it received six written comments in support of I.S. 231, explaining that it should remain open because the commenters believe it is a good school.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at I.S. 231 Magnetech 2000 on January 26, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 195 members of the public attended the hearing, 25 people offered comments on the proposal and 16 questions were submitted. Present at the meeting were I.S. 231 School Leadership Team members Desmond Poyser and Joanne Bouillion Middleton; CEC 29 members Herman Bagley and Bill Perkins; Deputy Chancellor Shael Suransky; District 29 Superintendent Lenon Murray; Anthony Conelli of the Division of School Support and Instruction; CCHS representative Monica Ayuso; Donovan Richards representing Councilman Sanders and Ernest Flowers representing Assemblyman Scarborough.

The following comments and remarks were made at the joint public hearing:

1. Herman Bagley, member of CEC 29, read a statement on behalf of the CEC expressing support for I.S. 231 and disappointment that I.S. 231 had been proposed for phase-out. He cited the New York State Education Department's reconfiguration of scores and said that all schools should be given another year to prove themselves. He expressed support for the students, teachers and staff at I.S. 231. He noted that the CEC tried to dissuade the DOE from having the hearing due to the weather.
2. Desmond Poyser, Academic Coordinator for the Carson Academy and SLT Chairman, made a statement in support of I.S. 231. He said that I.S. 231 is a school on the rise and spoke to the administration's efforts over the summer to improve the school. He asked for time for the changes made at I.S. 231 to mature.
3. Joanne Middleton, president of the PTA, said I.S. 231 had not been provided adequate funding to support its students, and she said more funding is needed to improve the school.
4. Donovan Richards spoke on behalf of Councilman Sanders. Mr. Richards spoke of the need to support and reward teachers and his confidence that I.S. 231 was ready for change. He said that community involvement was necessary in every choice made with regard to I.S. 231's future. Mr. Richards said that I.S. 231 needs more funding and other resources to improve. He encouraged the I.S. 231 community to be proactively involved with the school and he advocated a "facelift" for the I.S. 231 building.
5. Ernest Flowers spoke on behalf of Assemblyman Scarborough. Mr. Flowers spoke of his pride in I.S. 231's students, faculty, staff and community and his intention to continue advocating for I.S. 231.

6. William McDonald, member of CEC 29, stated that schools and students haven't failed, but have been let down by the entities entrusted to support them. He said that conversations with I.S. 231 around school improvement should have begun much earlier. He said the community has been asking for more resources and support for years. He said communities "on the other side of the Grand Central Parkway" were included in the decision-making process and provided with proper supports and resources.
7. One commenter stated that I.S. 231 is being sacrificed for the failures of the DOE. He stated that it is the DOE's responsibility to fix schools rather than close them. He questioned the lack of support and resources provided to I.S. 231 as its enrollment has increased and noted that the school was rated "proficient" in its most recent Quality Review. He noted recent initiatives to improve the school's performance, and he asked that the DOE be held accountable for low-performing schools.
8. Multiple commenters said I.S. 231 needs to be given more time for new initiatives to go into effect and improve the school.
9. One commenter voiced his opposition to the phase-out of I.S. 231 and questioned the strategy of replacing large schools with multiple, smaller schools. He said the DOE has consistently sent high needs students to schools which it then proceeded to phase out. He advocated increasing resources and supports for struggling schools rather than phasing them out.
10. One commenter took issue with the DOE's literature around the I.S. 231 phase-out proposal, saying there were more detailed figures around the percentage of failing students than there were details around the supports provided to those students. She questioned whether the replacement schools showed more promise of success than I.S. 231 and voiced concern that her child would be stigmatized for having gone to I.S. 231.
11. Multiple commenters advocated providing I.S. 231 with more funding rather than replacing it with new schools. One commenter suggested that new school funds should be used to support the current school instead of creating the new schools.
12. One commenter spoke of the high quality education his sons received in New York City public schools years before, asking what had happened to the DOE that it had to phase out under-performing schools. He questioned how I.S. 231 was allowed to decline to the point where phase-out was the last remaining option. He also questioned whether anyone is in a position to provide oversight for the DOE. He said phase-out hearings only happen in black and Hispanic communities and cited that as evidence of racism in the DOE.
13. One commenter noted that I.S. 231 was a "school of last opportunity" that welcomed students who had been kicked out of other schools or were failing in their previous schools. He said this is the reason I.S. 231 has been labeled a failing school. He noted Principal Lubin's ability to draw talented teachers to I.S. 231 and spoke of the principal's efforts to break down the school into smaller academies similar to what has been proposed by the DOE. He said I.S. 231 needed more time for those efforts to bear fruit.
14. One commenter who graduated from I.S. 231 said that it was a model of excellence when she was there and questioned the cause of its decline. She said that the EIS included substantial information about supports provided to the faculty and staff but

- little information about supports provided to students. She cited the DOE's concern that I.S. 231 lacks the ability to turn around quickly and asked how the DOE defines quickly.
15. Multiple commenters voiced concern about the provision of adequate supports for students currently in the 6th and 7th grades who would remain at I.S. 231 as it phases out.
 16. Multiple commenters voiced concern that I.S. 231 would have an experience similar to Jamaica High School after it was proposed for phase-out.
 17. One commenter encouraged the community to be vocal in its opposition to I.S. 231's phase-out, noting the success of the lawsuit against the DOE that prevented schools from being phased out in 2010.
 18. One commenter critiqued the format of the hearing, saying that the DOE is doing only what is legally mandated as a result of the lawsuits that prevented phase-outs in 2010. He said the DOE has no plans for the schools and is trying to incite divisions among communities. He asked who would hold accountable the administrators at the DOE who allowed schools decline to the point where phasing out was the last remaining option.
 19. One commenter noted that the teachers at I.S. 231 had not given up on the school and detailed the work they have put into improving the school since this past summer.
 20. Multiple students made comments in support of I.S. 231, asking the DOE not to proceed with its proposal to phase out the school.
 21. Multiple commenters spoke of the negative impact on children who attend schools labeled as failing.
 22. Multiple questions were submitted asking whether the Chancellor or other DOE staff had visited the school previously; and if not, why they had not been there to help. An invitation was extended for the Chancellor to visit.
 23. One commenter refuted the previous supports to the school as described in the EIS and stated that no help has been provided to any of the 25 schools proposed for phase-out.
 24. One commenter asked why the community should believe that their input matters since no school closing decision has been changed as a result of community feedback.
 25. One commenter asked what supports were implemented to improve the school before this proposal was made.
 26. One commenter stated that they understood that students in the school were not prepared for junior high, and wanted to know what the solution was for future students.
 27. A commenter asked when the DOE would announce the new location for the ALC in the building and which organization it would be co-located with.
 28. One commenter asked why students who don't make Level 3 and 4 would be pushed out of the school.
 29. One commenter asked why I.S. 231 was selected for phase-out.
 30. One commenter cited that the school currently shares facilities with the neighboring elementary school and asked how the DOE planned for four schools to share facilities starting in September.

The DOE received comments at the Joint Public Hearing which did not directly relate to the proposal.

31. Multiple commenters, including members of the CEC, expressed frustration with the decision to move forward with the joint public hearing despite the inclement weather. One commenter cited the mayor's declaration of a state of emergency and questioned the wisdom of continuing to hold the hearing. The commenter noted that a marching band of 150 children that had been gathered outside the building had to be sent home because of the weather.
32. Multiple questions were submitted regarding the decision to move forward with the hearing despite weather conditions:
 - a. How much community input was expected as a result;
 - b. If the mayor appoints the Chancellor and her deputies, why can they not postpone the meeting;
 - c. How can the DOE show such disregard for the safety of the community;
33. One question was submitted asking how DOE staff can sleep at night.
34. One commenter stated that Councilman Sanders had arranged for funding for computers and smartboards for District 29 schools, and asked when they would be received and when teachers would be trained to use them.
35. One commenter questioned the DOE's use of Race to the Top funds.
36. One commenter noted that I.S. 231 is having a negative impact on the value of his property and his quality of life and spoke of his support for homeowners and community stakeholders who had not been involved in conversations around I.S. 231's future.
37. One commenter voiced opposition to the absent teacher reserve and the mayor's efforts to reform civil service laws.
38. One commenter said the DOE needed to be audited so that it would stop receiving federal funding.

Summary of Issues Raised in Written and/or Oral Comments Submitted to the DOE

39. A commenter stated that the reason for the proposed phase-out was to get more money from the federal government, and that this could be achieved by splitting up the grades into different schools within the I.S. 231 organization. The commenter suggested that calling I.S. 231 a failing school was a false pretense and the DOE should be honest with families about finding creative ways to get more funding. The commenter also stated that this was only done in communities where parents do not pay attention or fight back.
40. The DOE received a document from the Tri-Community JHS 231 Parents Association regarding the phase-out and replacement of I.S. 231. Regarding the proposed phase-out, it stated:
 - a. The community feels that school leadership is lacking in vision, direction and sense of urgency and that new leadership is needed. The community would like to be involved in the decision-making process.

- b. The community feels that a review of administrative support staff is in order.
 - c. Based on recent changes in curriculum and program offerings, the community is requesting that no further changes be made, for continuity and because the new program offerings have worked in the past.
 - d. Based on public perception and concerns about disruption, the community suggests that current program offerings be re-evaluated at the end of the year and if necessary, new structures could be phased in under the same leadership. The community feels that two organizations in the building would be detrimental to the environment and public perception.
41. The DOE received a comment concerning all phase-out proposals calling for a moratorium on school closings, which stated that the DOE is the servant of the people and is not acknowledging the community's opposition to these proposals. The commenter suggested a facilitated discussion process which would work towards consensus.

Analysis of Issues Raised, Significant Alternatives Proposed and Changes Made to the Proposal

With regard to comment 1, the DOE accounted for changes in cut scores when making decisions to propose to phase-out schools. All schools are judged against a peer group, all of which experienced the same drop in cut scores.

With respect to the portions of comments 2, 4, 7, 8, 13,14 and 40(d) stating that I.S. 231 requires more time to demonstrate improvement, the DOE has judged that I.S. 231 is not capable of turning around quickly due to the school's continual decline in its learning growth rate over the past three years. Even if this trend were to reverse and learning growth rates increased substantially, several more cohorts of students would pass through IS 231 before the school would see real improvement. The DOE believes that incoming students would be served much better by two new schools than they would be I.S. 231 as it attempts to reverse its downward trend in student achievement and learning growth.

With regard to the portion of comments 2 and 7 stating I.S. 231 is on the rise, the DOE looked carefully at the school's performance outcomes. These figures show that neither proficiency rates nor measures of student growth are on an upward trend.

With regard to comment 3, 4, 6, 7, 9, and 11 regarding the funding and resources provided to of I.S. 231, the DOE provides all schools, including I.S. 231, funding on a per-pupil basis. In an effort to turn I.S. 231 around, the DOE has provided the school with numerous additional supports in the areas of school leadership, instruction, and operations. Given the extent of these investments and the negligible improvements that resulted, the DOE does not believe that extra funding or resources are the appropriate approach to dramatically improving the school.

With respect to comment 4, the DOE has worked to involve the community throughout this process, including holding meetings in the fall at the school with the Principal, SLT, and parents. As mentioned in the Analysis of Public Comment for the proposal to replace I.S. 231 with two new middle schools, the DOE has sought feedback from the community regarding what it would like to see in the new schools. Finally, with regard to the commenter's suggestion that I.S. 231 be provided a "facelift," the School Construction Authority makes capital improvements to school buildings throughout the city and prioritizes projects based on need.

With respect to comment 6, the DOE began the investigation process of I.S. 231 as soon as the most recent Progress Report figures were available, and began conversations with the school explaining that it was under investigation shortly thereafter. Finally, the DOE engaged in this same process for all schools investigated for poor performance, regardless of geography.

With respect to comment 7, the DOE believes that I.S. 231 does not have the capability to turn around quickly. The commenter indicates that the enrollment at I.S. 231 has increased; this is not true; in fact the enrollment has decreased in recent years. I.S. 231 has continued to be supported by its Children First Network and has been funded according to the per-pupil formula. I.S. 231 was rated Proficient on its most recent Quality Review, but the Quality Review is just one of many factors taken into account as we determine whether a school ought to be phased out. No single factor in itself provides an accurate portrait of any school's performance, and the DOE believes that, taken altogether, the factors around I.S. 231 indicate that the school's phase-out and replacement with two new schools represents the best path forward for students and families in District 29. Finally, with respect to this comment and comments 12 and 18 concerning holding the DOE accountable for low-performing schools, the DOE believes it is holding itself accountable by replacing I.S. 231 with two high quality new schools.

With respect to comment 9 regarding the rationale for replacing low-performing larger schools with smaller schools, the DOE believes that small schools are structurally better able to provide students a high quality education. Small schools allow more personalized learning environments and individualized instruction for students and professional development for teachers. Additionally, the DOE compares schools to peer schools according to their student populations. With respect to I.S. 231, there are schools with similar populations of high needs students that are achieving significantly better results. Only those schools in each peer group consistently showing low performance have been proposed for phase-out.

With respect to comment 10 and 21, the DOE ensures students will not be stigmatized for having attended a phase out school by running and administering the High Schools Application Process centrally. No high school has a screening process which selects or denies students based on the middle school that they attended.

With respect to the portions of comments 10, 14 and 25 concerning the supports provided to I.S. 231 students and staff, the Educational Impact Statement provides that the following supports were implemented:

- Helping the school implement Reach for Tomorrow, which includes a computer program that allows students to work independently on math skills.

- Working with the school to secure student incentives for improved attendance; incentives included flights in single-engine planes with the Young Eagles at Calabro Airport, the opportunity to participate in a DNA extraction at the Brookhaven Laboratory and the chance for a free summer program at the University of California-San Diego.
- Supporting enrichment partnerships with the Lincoln Center Theatre, Manhattan Chamber of Dance, Flushing Arts Council, Center for Culture, Studio in a School, Classroom Inc. Chelsea Bank Program and Urban Advantage.

Any supports provided to teacher and administrators are intended to positively impact the educational experience of the students of I.S. 231.

With respect to the portion of comment 14 concerning how the DOE defines a schools ability to turn around “quickly,” the DOE does not quantify the amount of time required to turnaround a school “quickly.” However, the Department believes that phasing out I.S. 231 and phasing in two new district middle schools will best serve the students and families of this community.

With respect to comment 11, new schools funds are minimal—the annual support of \$30,000 is less than a first-year teacher’s salary. The DOE does not believe that this sum, if provided over the 3 years new schools receive it, would be a significant means of turning I.S. 231 around.

With respect to comment 12 regarding the rationale for phasing out schools, the DOE proposes to phase-out schools based on their overall performance, including many factors. While schools are judged against peer groups which account for student demographics, decisions to propose phase-out are made without regard to the race or ethnicity of the students in the schools. Regarding the comment about the decline of the school over a number of years, the DOE has continuously made efforts to support the school through its Children First Network each year.

With respect to comment 13 which implies that I.S. 231 has been labeled failing because of its admissions policy, the DOE believes strongly in unscreened schools, like I.S. 231, which accept all students, but also believes that these students should be held to the same high standards as other students. The Progress Report formula places more weight on student progress than it does on student performance. This ensures that schools which accept students on an unscreened basis are judged more by how much they help those students grow than on the absolute level of proficiency of those students.

With respect to comment 15, 21, and 26, current I.S. 231 students in sixth and seventh grades would continue to be supported by the school’s Children First Network. In past cases, measures of student performance (i.e. graduation rates) tend to improve as schools phase out, suggesting the support of the school as it phases out has been helpful.

With respect to comment 16, this question is too vague for the DOE to provide a response.

With respect to comment 18, Joint Public Hearings are part of the legally mandated process for the DOE to implement significant changes to school utilization. The process is set forth in Chancellor's Regulation A-190. Joint Public Hearings were also held in 2010, prior to the lawsuit the commenter mentioned. This year, in addition to holding Joint Public Hearings, the DOE has held several additional meetings with communities with schools proposed for phase-out. The DOE has carefully prepared plans for the replacement of I.S. 231, as mentioned in the EIS and Analysis of Public Comment for that proposal.

With respect to comments 19 and 20, the DOE recognizes that I.S. 231 has a committed staff that has worked hard to support its students. However, despite these attempts to help meet the needs of its students, along with the support and assistance provided by the DOE, I.S. 231 has not developed the culture and conditions to effectively support its students' instructional needs and therefore the DOE believes that phasing out the school is appropriate.

With respect to comment 22, the Chancellor has not recently visited I.S. 231. However, and also with respect to comments 23 and 25, other DOE staff, including the District 29 Superintendent and the school's Children First Network Leader and other Network support staff have been to the school on multiple occasions to observe and provide support. A detailed description of these supports is included in the EIS and earlier in this document.

With respect to comment 24, the DOE does take community input into account, though this does not always change the DOE's final decision, as was the case with the proposal to phase-out I.S. 231. However, the DOE used the community input concerning the proposed phase out of I.S. 231 to plan the two proposed replacement schools, as explained in the Analysis of Public Comment of the replacement proposal.

With respect to comment 27, the DOE has already announced that it is moving the ALC into Building Q883 in District 28 for the 2012-2013 school year, which is the first year when that building will be available for a new occupant. The ALC will not be co-located with any other school once it moves to this building.

With respect to comment 28, no students, especially those performing at levels 1 and 2, will be "pushed out of the school." I.S. 231 will continue to educate all students currently in sixth and seventh grade over the next two years, and the two new schools will educate all students entering the school as sixth graders next year and in all future years, regardless of their proficiency levels.

With respect to comment 29, I.S. 231 was selected for phase-out based on several factors, including but not limited to its continued low academic outcomes for student proficiency and progress. For more information on this decision making process, please see the EIS.

With respect to comment 30, I.S. 231 and P.S. 251 are not co-located. While the buildings are connected, the two schools and buildings do not share any spaces. Regarding I.S. 231 and the two proposed new schools, the Borough Director of Space Planning for Queens has determined that all four schools can fit within the larger tandem building; specifically, I.S. 231 and the two new schools will be co-located in the Q231 portion of the building. As with all co-located schools, I.S. 231, I.S. 355 and I.S. 356 will all have representatives on the Building Council,

including all principals, UFT representatives, and parents from each school. The Building Council meets monthly to update plans for the shared spaces and find shared solutions to any concerns. If necessary, the Borough Director of Space Planning is available to assist in these meetings.

With regard to comment 34, the school can work with CM Sanders on the materials and training for these technological additions. I.S. 231's Children First Network will also support the school in these efforts.

With respect to comment 39, the DOE does not believe that splitting up the grades into schools of only one grade would be an appropriate instructional decision. Further, while the commenter suggested the phase-out proposal is about "finding creative ways to get more funding," the decision to propose the school's phase-out was made based on school performance, not with regard to funding opportunities or anticipated parent response.

With respect to comment 40:

- a. The DOE sought feedback from the community around the possibility of phase-out in the fall of 2010. The DOE has also sought and continues to seek community feedback regarding the proposal to replace I.S. 231 with two new schools.

With respect to comment 41, the central goal of the Children First reforms is to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school – led by a dedicated leader with a vision for student success. To ensure that as many students as possible have access to the best possible education, since 2003 New York City has replaced 91 of our lowest-performing schools with better options and opened 474 new schools: 365 district schools and 109 public charter schools. As a result, we've created more high-quality choices for families.

Based on feedback from communities in 2009 and 2010, the DOE made improvements to its timeline and process for communicating with schools and families early and often throughout the investigation and decision making process. This year, we talked to school leadership, parents, SLTs, CECs, elected officials, and local CBOs about our ideas about how to improve struggling schools. We convened these meetings to discuss our proposals and to hear feedback and new ideas.

The Department developed and distributed "Fact Sheets" for each school we talked with. These fact sheets described proposals, the rationale behind them, included relevant data, and provided clear instructions for how to offer feedback. They were posted on our website and distributed at meetings.

When we announced the Department's recommendation to propose the school for phase out, dedicated teams of educators and engagement specialists spent several days back in these schools meeting with teachers, parents, and students.

In January, Joint Public Hearings were held for all proposals and public feedback was collected at these meetings and through dedicated email and phone numbers. The Department’s analysis of public comment is contained in this document.

Portions or all of comments 2, 5, 17, 20, and 39(c) and (d) voiced general support for I.S. 231 and opposition to the proposal without raising specific issues requiring a response. Again, the DOE recognizes that I.S. 231 staff and families have worked hard to improve the school. The DOE also provided considerable support to I.S. 231, including extensive training for school leaders and teachers, helping the school restructure into small learning communities, and working with the school to secure partnerships with community-based organizations. Unfortunately, these efforts have not turned the school around, the DOE believes that only the most serious intervention—the gradual phase-out and eventual closure of I.S. 231—is the action we must take to best serve students and the community. It will allow for new school options to develop in Building Q231 that will provide the highest quality options to families.

Changes Made to the Proposal

No changes were made to the proposal.