Department of Education

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Chancellor

Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Phase-out of Aspire Preparatory Middle School (11X322) Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

On December 19, 2011, the New York City Department of Education ("DOE") issued a proposal to phase out and close Aspire Preparatory Middle School (11X322, "Aspire") because of its low performance and its inability to turn around quickly to better support student needs. Aspire is an existing zoned middle school housed in building X135 ("X135" or "Whalen Campus"), located at 2441 Wallace Avenue, Bronx, NY 10467, in Community School District 11 ("District 11"). Aspire currently serves students in sixth through eighth grades and admits students through the District 11 Middle School Choice process through a campus choice model, described in more detail below. If the phase-out proposal is approved, Aspire will no longer admit sixth-grade students after the conclusion of the 2011-2012 school year. One grade will then be phased out in each subsequent year. Aspire will close in June 2014. Current students will continue to be served and supported by Aspire as they progress toward completion of middle school. Current eighth-grade students will be supported through the Citywide High School Admissions Process as they apply to a high school.

On January 13, 2012, the DOE issued an amended Educational Impact Statement ("EIS") correcting several typographical errors, including additional information about how enrollment projections are calculated, and correcting the number of sixth grade seats that will remain in District 11 after the implementation of this and several concurrently posted proposals.

Aspire is currently "co-located" in building X135 with Bronx Green Middle School (11X326, "Bronx Green") and Pelham Academy of Academics and Community Engagement (11X468, "Pelham Academy").[1] Aspire, Bronx Green, and Pelham Academy are existing zoned middle

[1] A "co-location" means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, libraries, and cafeterias.

schools that currently serve students in sixth through eighth grades. The schools all admit students through the District 11 Middle School Choice process and offer priority to students residing in the Whalen Campus zone through a campus choice admissions method, in which all students zoned to the Whalen Campus have priority for a seat on the campus and rank each school in the order of preference. Students are then matched to one of the schools through a matching process operated by the Office of Student Enrollment ("OSE").

In a separate EIS, also posted on December 19, 2011 and amended on Jaunary 13, 2012, the DOE proposed to co-locate a new zoned middle school, I.S. 556 (11X556, "I.S. 556"), in building X135, which will serve students in sixth through eighth grades when it reaches full scale in 2014-2015. This new middle school will admit sixth-grade students through the same campus choice model. If the proposal to co-locate I.S. 556 in building X135 is approved, it will provide a new middle school option for District 11 families and replace the seats lost by the proposed phase-out of Aspire. I.S. 556 will be co-located in the Whalen Campus with Bronx Green, Pelham Academy and Aspire as it phases out.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at the X135 school building on January 23, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 120 members of the public attended the hearing, and 22 people spoke.

Present at the meeting were: Deputy Chancellor Kathleen Grimm; Executive Director of the Division of Academics, Performance and Support Gregg Betheil; District 11 Community Superintendent Elizabeth White; Community Education Council 11 ("CEC 11") President Petra Poleon; CEC 11 representatives Grace Loraglio and Elizabeth Bemelek Goka; Bronx Borough President Panel for Educational Policy ("PEP") Appointee, Wilfredo Pagan; Aspire Principal Steven Cobb; Aspire School Leadership Team ("SLT") members Irene Strag Boucage and Nixa Rivera; Aspire Co-PTA president Mr. Webbington; Pelham Academy Principal Anthony Rivera; Pelham Academy SLT members Reene Oldon and Ms. Rodriguez; Bronx Green principal Charles Johnson;; Bronx Green SLT member Carmen Laponte; and Amanda Cahn and Stephanie Crane from the Division of Portfolio Planning

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

1. Principal Steven Cobb gave a presentation in which he made the following points:
    a. Aspire's SLT disagrees with proposal to phase out the school.
    b. Aspire has a history of success with gains in math, English Language Arts ("ELA") and special education until 2009.
    c. In 2010 there was a change in the way tests were scores which impacted all schools Citywide.

d. Students at Aspire have excelled in Regents courses and a number have been admitted to specialized high schools across the city.
e. Last year, Aspire had a projected register of 572 students and so many students attempted to enroll that the school had to cap its classes and overflow students to other sites in the district.
f. In 2010-2011, eight teachers took long-term absences due to medical issues. These teachers were replaced by substitutes which disrupted student learning.
g. Aspire has made significant improvements throughout the year and has taken many steps to develop the staff and support students academically and emotionally.

2. Wilfredo Pagan, the Bronx Borough President's PEP appointee, stated that he disagrees with proposal to phase-out Aspire. He stated that the DOE has not supported Aspire or given it proper resources and asks that DOE listen to community.

3. Grace Loraglio, the second vice president of CEC 11, commented that:
    a. She does not trust the DOE's data and believes there is no transparency in how the data is input.
    b. Aspire has a great support system between the PTA and the principal.
    c. The DOE didn't give Aspire enough time to improve.
    d. How does the DOE decide to phase out one school and not another?

4. James Webbington, Aspire's PTA President, commented that the DOE failed to support Aspire and that instead of phasing out the school, the necessary support should be provided.

5. Steve Bennett, a CSA field representative, stated that:
    a. Schools that were opened under Mayor Bloomberg's administration are supposed to be higher performing but 11 of these new schools are being proposed for phase out this year.
    b. New York City is not a place for experimentation with schools and students should not be subjected to repeated school closings. Students have not benefited from this supposed new school safety net but rather have been turned away for reasons of poor academic achievement and are "warehoused" in other low performing schools that may someday be closed.
    c. He further commented that phase out schools are attended by children of color, and are generally located in economically disadvantaged communities.
    d. School closure is an admission of failure by city hall and the administration needs to take more responsibility, not less, for schools that are not doing well.

6. One commenter stated that phase outs have significant psychological impact on staff and students. The last phase out on the Aspire campus caused too much stress. Aspire needs support not another phase out.
7. Several commenters stated that Aspire is not a dangerous school and they do not understand why it was placed on the Persistently Dangerous Schools list.
8. Several commenters voiced general opposition to the proposal to phase out Aspire.
9. Several commenters praised the principal, administration, PTA and staff at Aspire. Many acknowledged that the staff at Aspire has created a family-like atmosphere and helped students to succeed.
10. Several commenters inquired about the previous supports that have been given to Aspire to help the school improve and succeed.
11. Several commenters challenged the DOE's school closure policy, asked for details about the process and why Aspire, specifically, was chosen for this form of intervention.
12. Several commenters stated that they believed Aspire should be given more time to turn around and improve.
13. Several commenters questioned the funding and resources provided to Aspire and asked the DOE to allocate resources to Aspire instead of phasing it out and bringing in a new school.
14. Several students and parents noted the successes that they (or their children) had achieved at Aspire and after graduation.
15. One commenter voiced concern that the proposal would have a negative impact on the community surrounding Aspire.
16. One commenter acknowledged the extensive support the school received from the District 11 Community Superintendent.
17. Several commenters voiced concern about the special education community at Aspire and the accessibility of programs for special education programming for students after the phase-out of Aspire.
18. One commenter noted the absence of several teachers last year and how it negatively impacted his ability to learn.
19. One commenter inquired about where younger siblings of current students and general future students would be able to attend middle school.
20. One commenter claimed that the DOE has never kept a school open that it has proposed to phase out.
21. One commenter encouraged all to attend the February Panel for Education Policy ("PEP") meeting where this proposal will be voted on

During the Question and Answer Period, the following questions were submitted:

22. Is there a systematic and transparent protocol in place for selecting which schools are phased out? What is this process?

23. Why won't the DOE give Aspire time to turn around?
24. Has Aspire received Race to the Top funds?
25. Is the internet the only way to learn about the proposal and provide feedback?
26. Can you explain what you mean by underutilized space?
27. What supports have been given to the school?
28. What is going to be done for students remaining at Aspire, particularly special education students?

In addition to collecting feedback at the Joint Public Hearing referenced above, the DOE solicited feedback on this proposal via email, telephone and an internet feedback form.

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

29. An oral comment was submitted on January 21, 2012 voicing support of Aspire and noting positive achievement a student made at the school.
30. A letter was submitted on January 25, 2012 that expressed support for the staff, principal, students and overall school environment.
31. A letter submitted on January 25, 2012 also pointed to the ELA scores, math scores, Regents scores, and student enrollment rates as signs of the school's progress and achievement.
32. Class Size Matters ("CSM"), submitted written comments objecting to all of the proposed phase-outs and truncations proposed by the DOE. In opposing the DOE's proposal to phase-out and eventually close these schools, the CSM comments cited the following reasons: (1) none of the Educational Impact Statements for the proposals include discussion of how the proposed phase-outs or, where applicable, the co-locations would affect class size; (2) the Citywide Instructional Footprint does not include class size standards; (3) the Educational Impact Statements use utilization figures from the DOE's Blue Book, which does not take into account the need to reduce class sizes in schools Citywide; (4) the community members, faculty, and families of schools that have been proposed for phase-out have opposed the proposed phase-outs and truncations; (5) the schools that have been proposed for phase-out and/or truncation have high concentrations of "at-risk" students, as defined as English Language Learner students, students with disabilities, and economically disadvantaged students.

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

Comments 1(a), 2, and 8 voice general opposition to the proposal.

While many members of the Aspire community object to the possibility of phasing out the school, the DOE believes that drastic action must be taken given the school's performance struggles and recent decline. The DOE will continue to support current Aspire students working toward promotion and as we develop plans to replace Aspire with another school that will better meet future student and community needs.

Comments 2 and 25 ask the DOE to listen to the community feedback regarding the proposal and ask how to access the proposal and provide feedback.

The DOE appreciates all feedback from the community regarding a proposal. When an EIS is issued, it is made available to the staff, faculty and parents at all the impacted schools, on the DOE's Web site, and in each school's respective main office. In addition, the DOE dedicates a proposal-specific website and voicemail to collect feedback on this proposal.

The EIS for this proposal can be found on the Department of Education's Web site: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals.

Copies of the EIS are also available in the main office of Aspire Preparatory Middle School, Bronx Green Middle School and Pelham Academy of Academics and Community Engagement in Building X135. Additionally, letters to families were backpacked home with students. These letters provide a summary of the proposal, how it is expected to impact current students, and where to find more information and provide feedback.

Written comments can be sent to D11Proposals@schools.nyc.gov and oral comments can be left at 212-374-5159.

As stated above, while many members of the Aspire community may object to the possibility of phasing out the school, the DOE believes that drastic action must be taken given the school's performance struggles and recent decline. The DOE will incorporate community feedback as we continue to support current Aspire students working toward promotion and as we develop plans to replace Aspire with another school that will better meet student and community needs.

All feedback given to the DOE is summarized and analyzed in this document which is made available to the PEP for consideration before voting on all proposals.

Comments 1(b), 1(c) and 31 pertain to historical performance at Aspire, with particular reference to academic improvements that took place in 2009 and the adjustment of "cut scores" in 2010.

The DOE recognizes that some Aspire students have made achievements and progress while at Aspire in the past few years. Nevertheless, in school year 2009-2010, the ELA proficiency rates dropped from 61% to 28%. In the 2010 – 2011 school year, the ELA proficiency rate dropped again to 24%, putting the school in the bottom 40 of schools Citywide. Similarly, in the 2009-2010 school year, the math proficiency rate at Aspire dropped from 76% to 42%. In the 2010 – 2011 school year, the math proficiency rate dropped to 38% putting Aspire in the bottom 34% of schools Citywide. Additionally, Aspire's overall progress report grade has declined each year since 2008 – 2009.

In 2010, the New York State Education Department adjusted the "cut scores" on annual mathematics and English Language Arts exams, raising the score required for students to achieve Level 3 (grade-level proficiency) or higher on the exam. As a result, the percentage of students

performing at grade level fell significantly at schools statewide, including most New York City schools. While the percentage of students achieving proficiency declined, on average, New York City's students' raw scores on the tests remained largely unchanged relative to the prior year. This change in scoring methodology affected all schools citywide, and yet many schools performed and continue to perform better than Aspire.

Comments 1(d,g), 3(b), 9, 14, 16, 29 and 30 note positive student achievement at Aspire and voice general support for the administration, teachers, PTA and school community at Aspire.

The DOE commends and acknowledges the students and staff of Aspire for their hard work. While the DOE notes that some Aspire students may have achieved success, and while many members voiced support of administration, teachers, PTA and overall school community at Aspire, the DOE believes that drastic action must be taken given the school's performance struggles and recent decline.

In a concerted effort to ensure that all students have access to high-quality school programs, the DOE annually reviews all performance of all schools citywide. During the process that identifies schools that are having the most trouble serving their students, the DOE found Aspire to be among these schools. As noted in the EIS proposing Aspire's phase-out:

- The majority of Aspire students remain below grade level in English and Math. Last year, only 24% of students were performing on grade level in English and only 38% of students were performing on grade level in Math – putting the school among the lowest performing middle schools Citywide.

- Aspire is not adequately helping students to make progress. Aspire is in the bottom 9% of all middle schools Citywide in terms of learning growth in English and is in the bottom 6% of all middle schools Citywide in terms of learning growth in Math. Learning growth measures annual student growth on State ELA and Math tests relative to similar students. If these conditions persist, Aspire students will fall further behind their peers in other schools.

- The Progress Report measures the progress and performance of students in a school as well as the school environment, compared to other schools serving similar student populations. Aspire earned an overall F grade on its 2010-11 annual Progress Report, including F grades for Student Progress and School Environment and a D grade for Student Performance.

- While Aspire received a B grade on its Progress Reports in 2007-08 and 2008-09, it has subsequently struggled. Aspire received a C grade in 2009-2010 and an F in 2010-2011. Based on Aspire's most recent Progress Report, the school is in the bottom 3% of middle schools Citywide.

As a result, the DOE has determined that the best course of action is to phase out the

school and allow for new school options that will better serve the community.

Comment 1(e) pertains to the high student enrollment and the historical need for capping and overflow at Aspire.

No grade sections at Aspire were capped and overflowed by the Office of Student Enrollment this school year. Additionally, the overall enrollment at Aspire declined between 2009-2010 and 2010-2011 with the demand for 6th grade seats declining by approximately 35%.

The DOE does note that recently there has been a higher than average need for seventh-grade over-the-counter seats at the X135 campus. However, these students have been placed in all three co-located schools on the campus, and the other two schools are producing better student outcomes with the same zoned student population.

Comments 1(f) and 18 refer to the high rate of teacher absences at Aspire in the 2010 – 2011 school year.

While the DOE acknowledges the staffing challenges that took place at Aspire during the 2010-2011 school year, the DOE initiated a comprehensive review of Aspire that looked at both recent and historical performance, consulted with superintendents and other experienced educators who have worked closely with the school, and gathered community feedback.

The challenges with teacher attendance were limited to the 2010-2011 school year, but Aspire has struggled to improve for longer than this one year, and the school's performance during the last few years confirms the DOE's assessment that it lacks the capacity to turn around quickly to better support student needs. The details regarding Aspire's performance over the past few years are noted in the EIS and in the above responses to comments 1(b), 1(c) and 31 and 1(d,g), 3(b), 9, 14, 16, 29 and 30.

Comments 2,4,10, and 27 inquire about the supports given to Aspire prior to the decision to phase it out.

All schools receive support and assistance from their superintendent and Children First Network ("CFN"), a team that delivers operational and instructional support directly to schools. Struggling schools receive supports as part of system-wide efforts to strengthen all schools; and they also receive individualized supports to address their particular challenges. The CFN does everything it can to provide struggling schools with leadership, operational, instructional, and student supports that can help turn a struggling school around.

To help Aspire's efforts to improve performance, the DOE offered it numerous supports, including:

Leadership Support:

- Providing extensive leadership training and mentoring for the principal and assistant principals to help them set clear goals for the school while developing the school's Comprehensive Education Plan and Language Allocation Plan.
- Providing on-going support in operating, developing, and maintaining a meaningful summer school program.
- Coaching and training leadership on implementing plans in support of Citywide instructional initiatives and teacher effectiveness.

Instructional Support:

- Training and coaching leadership, teachers, and curriculum development teams on instructional improvement strategies, including the sequencing and mapping of rigorous curriculum.
- Supporting teacher teams in using data analysis to improve instruction for targeted student populations such as English Language Learners, students with disabilities, and students performing below grade level.
- Coaching English Language Arts teachers in the development of discussion and guided writing techniques, aimed at raising student achievement and strengthening teacher practice.
- Facilitating training in technology integration and utilization to improve teacher practices, raise student interest, and increase achievement.
- Training teacher teams in various data-driven tools, supports, and measures aimed at improving student achievement through developing data analysis as a best practice.

Operational Support:

- Coaching school staff on budgeting, human resources, teacher recruitment, and building management.
- Training and supporting school leaders in monitoring student progress and meeting compliance regulations for English Language Learners and students with disabilities.

Student Support:

- Training staff in conflict management, aimed at improving best practices and outcomes when working with difficult behavior patterns.
- Training the School Based Support Team in comprehensive guidance programs and evidence-based counseling strategies targeted at developing and improving the capacity for social and emotional supports at the school level.

Despite these supports, Aspire has not been able to succeed and has failed to develop the proper infrastructure to meet the needs of its students and families.

Indefinitely trying to turn around a school that has struggled for years is not a gamble we are willing to take. We have had enormous success around the City replacing our lowest-performing schools with new schools that perform better. We owe it to our families to give them the best possible options, and in some cases that means replacing low-performing schools with new ones.

Comments 2, 4, and 13 pertain to the resources previously given to Aspire, voice a need for more resources, and suggest that the resources used to open a new school should instead be given to Aspire.

All public schools in the city are funded through a per pupil allocation. That is, funding "follows" the students and is weighted based on student's grade level and need (incoming proficiency level and special education/ELL/Title I status). If a school's population declines from 2,500 to 2,100 students, the school's budget decreases proportionally—just as a school with an increase in students receives more money. While every school across the city receives funding via the same formula, some schools have been less successful in serving students than their peer schools that serve similar populations.

After the comprehensive review of school data and community feedback, the DOE believes that Aspire lacks the capacity to improve quickly enough to provide its students with the best educational options, and only the most serious intervention—the gradual phase-out and eventual closure of Aspire—will best serve students and the community. Phasing out and closing Aspire will allow for a new school option to develop in the Whalen Campus that will provide better options for families.

Further, new schools are funded in the same manner as other schools: funding follows the students and is based on need (incoming proficiency level and special education/ELL/Title I status). While it is true that new schools receive start-up funding, the start-up funding they receive is an average of $30,000 per year over the first five years for an elementary or middle school and $34,000 for a high school. These annual amounts are not even large enough to cover the salary of a first year teacher.

Principals have discretion over their budget and make choices about how to prioritize their resources. New schools may choose to hire fewer administrative staff (e.g. only a single assistant principal) freeing up dollars to be directed toward other priorities.

Comments 3(d), 11 and 22 inquire about the New York City school phase-out policy, how a school is chosen to be phased-out, the timeline for this process, and why Aspire was selected for phase-out.

In a concerted effort to ensure that all students have access to high-quality school programs, the Department of Education annually reviews the performance of all schools citywide. This process identifies schools that are having the most trouble serving their students.

First we compile a preliminary set of schools that meet one or more of the following criteria:

- Received a grade of D, F, or a third consecutive C or worse on the 2010-11 Progress Report; and/or
- Received a rating of Underdeveloped on the most recent Quality Review; and/or
- Was identified as Persistently Lowest Achieving (PLA) by the State Education Department; and/or

- For high schools: Received a recommendation on their 2010-11 Joint Intervention Team ("JIT") review for significant change in organizational structure or phase out/closure.
- For elementary and middle schools: Received a recommendation for a significant change in organizational structure or phase out/closure on the 2010-11 JIT review. The JIT is composed of an outside educational expert, a SED representative, and a DOE representative. Its purpose is to conduct a review of struggling schools to guide the school's planning and restructuring initiatives.)

Next, we apply additional criteria to determine which schools are most in need of support or intervention. We remove from consideration schools that meet any of the following criteria:

- High Schools that have a higher graduation rate than the city average. The city average for 2010-11 is 65.1% and/or
- Elementary and middle schools that have a higher English Language Arts and Math average proficiency than their district average or the city average (whichever is lower). The city average for 2010-11 is 50.6% proficient; and/or
- Schools that received an A or B on the 2010-11 Progress Report; and/or
- Schools that earned a Well Developed or Outstanding score on the most recent Quality Review; and/or
- Schools receiving a Progress Report for the first time in 2010-11.

Schools that are removed from consideration for the most intensive support or intervention will receive differentiated support from their CFN team, but are not under consideration for phase out.

The most struggling schools are further investigated for more serious interventions that may include phase out/truncation and replacement. We consider a few key data points:

- Student performance trends over time;
- Demand/enrollment trends over time;
- Interventions already underway (e.g. SIG model);
- Talent data;
- School culture/environment;
- District needs/priorities; and
- School safety data.

In addition to investigating the data, we also have conversations with school staff, parents, students, communities, and networks to get a holistic sense of what is happening at the school and what supports or interventions would most likely improve student outcomes. In our early engagement meetings at these schools, we have conversations with these constituents about what is working and what isn't before making a decision about the supports or interventions that can best support student outcomes.

For the majority of schools we investigate, we see hope that the school can turnaround, and so we may replace the principal, change staff, invest in new programs or mentor teachers, and sometimes reconfigure grades to help the school change trajectory. But, in some cases, we are left with a set of schools that we know – based on quantitative and qualitative data – do not have the ability to improve quickly; and a decision is made to propose to gradually phase out the school and give future students a better opportunity.

At the end of this multi-step process, our analysis and engagement directs us to a set of schools that quantitative and qualitative indicators show do not have the capacity to significantly improve. Deciding what course of action can best support the students and community of a struggling school is not easy, but we are compelled to act based on our commitment to ensuring that every student has access to high-quality school.

No single factor determines whether a school will phase out or not. Deciding to phase out a school is the toughest decision we make. But it is the right thing to do for the students of New York City.

Comments 3(c), 12 and 23 voice Aspire's need for more time to improve.

As was described in the EIS, Aspire has struggled to improve, and its performance during the last few years confirms the DOE's assessment that the school lacks the capacity to turn around quickly to better support student needs. Aspire middle school students remain below grade level in English and math. In 2010-2011, only 24% of middle school students were performing on grade level in English and only 38% of students were performing on grade level in Math – putting the school among the lowest performing middle schools Citywide. Furthermore, Aspire is in the bottom 9% of all middle schools Citywide in terms of learning growth in English and is in the bottom 6% of all middle schools Citywide in terms of learning growth in Math. Learning growth measures annual student growth on State ELA and Math tests relative to similar students. If these outcomes persist, Aspire students will fall further behind their peers in other schools.

The DOE has offered specific supports to help the school's efforts to improve the middle school's performance, as detailed in the EIS and in response to comments 2, 4, 10, and 27 above, but even with support the school has not produced adequate outcomes for the students. Therefore, the DOE concluded that the phase out of Aspire is warranted because Aspire lacks the proper infrastructure to meet the needs of its students and families.

Further, as described above, the DOE has undertaken extensive review of performance at Aspire and has provided numerous unsuccessful supports to the school, leading the DOE to believe that the school lacks the capacity to turn around promptly to better support student needs. Aspire's current outcomes cannot be permitted to persist, as Aspire students will fall further behind their peers in other middle schools. Indefinitely trying to turn around a school that has struggled for years is not a gamble the DOE is willing to take.

Comment 3(a) pertains to the accuracy of the data the DOE uses to make determinations about schools.

The DOE makes every effort to ensure its data is vetted and true to its sources, especially with regard to the data used for Progress Reports. Though a commenter may disagree with which data is used or how it is used, this does not mean the data is incorrect

Comments 5(a,b,d) and 11 challenge the DOE's overall strategy of phasing-out and replacing low performing schools across New York City and note that new schools opened under the Bloomberg administration are also being closed.

The DOE is committed to providing a portfolio of high quality school options to students and families. A part of that strategy involves identifying the City's lowest performing schools and determining whether they can turn around quickly to better serve their student population. For the schools that the DOE determines lack the capacity to turn around quickly to better serve their student populations, the DOE recommends the most serious intervention: gradually phasing out the school over time by no longer enrolling new students.

This year, the DOE is proposing to phase out seven schools and truncate three schools that were opened under this Administration (since 2002). These ten schools represent less than 3% of the schools opened since 2002.

We count on each of our schools to provide a high-quality education to its students—and we hold all schools to the same high standard. If a school isn't getting the job done for students – whether it was opened recently or not – we are compelled to take serious action to ensure its students don't fall even further behind.

In June 2010, MDRC, an independent research group, issued a report on NYC's new small schools strategy. MDRC concluded: "it is possible, in a relatively short span of time, to replace a large number of underperforming public high schools in a poor urban community and, in the process, achieve significant gains in students' academic achievement and attainment. And those gains are seen among a large and diverse group of students — including students who entered the ninth grade far below grade level and male students of color, for whom such gains have been stubbornly elusive." (MDRC, "Transforming the High School Experience," June 2010.)

New York City was ahead of the curve in complying with President Obama's call to close or turnaround the lowest 5% of schools nationwide and provide better options to families. We simply can't stand by and allow schools to keep failing our kids when we know we can—and we must—do better. New York City's new schools strategy has helped us to deliver on the core promise we make to NYC families to provide *all* students with an excellent education.

Our new schools are overwhelmingly getting the job done for students, and when they aren't, and a school is struggling, we follow the same process to phase out and replace that school.

Comment 5(c) states the concern that the DOE targets specific communities and schools with a high percentage of students of color for phase-out.

The DOE does not consider student or community demographics when making decisions about interventions for struggling schools. A detailed description of the process by which the DOE arrives at a phase-out proposal is provided in the response to comments 3(d), 11 and 22.

Comment 6 pertains to the social and emotional impact of a potential phase-out.

The DOE recognizes that phasing out and closing a school is a difficult experience for students, staff, and community members.

If this phase out proposal is approved, Aspire will receive support in the areas of budget, staffing, programming, community engagement, guidance, and enrollment including, but not limited to:

- Helping the school provide students with options that support their advancement and fully prepare students for their next transition point.
- Working with school staff to foster a positive culture.
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

Additionally, it is important to note that decisions around the future of a school in no way reflect on the students who attend the school. We, rather than students, are responsible for the quality of a school. Whenever we make the decision to move forward with a proposal to phase out a school, we do so because students deserve a better option.

Comment 7 voices opposition to Aspire being placed on the Persistently Dangerous Schools list.

The DOE is committed to providing the best education and a safe learning environment to all students. In New York State, schools are designated Persistently Dangerous if, for two successive years, they have had serious incidents that meet or exceed criteria established by the State Education Department. This is a requirement imposed on school districts in all States. A school is considered Persistently Dangerous if for both 2009-10 and 2010-11, it has either: a School Violence Index (SVI) of 1.5 (approximately 6 incidents per 100 students) or at least 60 serious incidents and an index of at least .5. Schools that are identified as Persistently Dangerous Schools (PDS) must present a plan to the state for reducing incidents and increasing safety.

Although Aspire was identified as a PDS by the New York State Education Department, the DOE commends the schools efforts and feedback that indicates that many students, teachers and families in the community now feel safe at the school. The DOE will continue to work with Aspire to increase and ensure safety at the school during its phase out.

Comment 15 voices concern about the negative impact the school closure will have on the surrounding community.

The DOE recognizes the important role that schools play in their communities. We know that schools throughout the city are not just educational institutions, but rich and tight-knit communities. This is one of the many reasons why the decision to propose a school's phase-out is the most difficult decision we make.

We fully expect that the replacement school will be fully engaged with its community and responsive to its needs, serving a vital role as an anchor for the Aspire community. Comments 17 and 28 refer to the special education community currently at Aspire and express concern about programming for special education students in the future.

The proposed new middle school, 11X566, will be a valuable addition to the District 11 community and will serve all students who seek to enroll there.

Aspire currently offers Integrated Co-Teaching ("ICT") classes, Self-Contained ("SC") classes, and Special Education Teacher Support Services ("SETSS"). It also has an English as a Second Language ("ESL") program for English Language Learners ("ELLs"). The existing ICT and SC classes and SETSS will continue to be provided as Aspire phases out, and students with disabilities will continue to receive mandated services in accordance with their Individualized Education Programs ("IEPs"). Current students at Aspire who receive ELL services will continue to receive their mandated services as the school phases out. The proposed new middle school, 11X566, will serve all enrolled students with Special Education and/or English Language Learner needs.

The other schools currently located on the Whalen Campus also offer support for students with Special Education and/or English Language Learner needs.

Bronx Green and Pelham Academy currently offer ICT classes, SC classes, and SETSS, as well as ESL services. Students with disabilities and ELL students will continue to receive all mandated services if the proposals to phase out and replace Aspire are approved.

Comment 19
expresses concern over where younger students of siblings currently at Aspire will be able to enroll for middle school.

Younger siblings of students currently enrolled at Aspire will not have the opportunity to enroll at Aspire. However, through the District 11 Middle School Choice process, the proposed new school, 11X566, will be a middle school option for these students as will the other middle schools on the Whalen campus and other middle schools in District 11.

Excluding Aspire, there are currently 22 district schools located in District 11 that serve middle

school students. Of those, 16 are middle schools or secondary schools. The table below details the middle school options available to District 11 families:

DBN	School Name	Building Code	Address	Grade Span 2011-12	Grade Span at Scale	Building Utilization	2010-2011 Progess Report Grade	% SE	% ELL	Admission Method	Site Accessibility
Zoned wth Choice Options											
11X127	J.H.S. 127 The Castle Hill	X127	1560 PURDY STREET	6-8	6-8	81%	C	11%	11%	Zoned	Not functionally accessible
11X144	J.H.S. 144 Michelangelo	X144	2545 GUNTHER AVENUE	6-8	6-8	63%	C	13%	6%	Zoned	Not functionally accessible
Campus Choice Options											
11X272	Globe School for Environmental Research	X113	3710 BARNES AVENUE	6-8	6-8	89%	C	14%	11%	Unscreened	Partially programmatically accessible
11X287	The Forward School	X113	3710 BARNES AVENUE	6-8	6-8	89%	B	19%	6%	Unscreened	Partially programmatically accessible
11X289	The Young Scholars Academy of The Bronx	X113	3710 BARNES AVENUE	6-8	6-8	89%	C	15%	7%	Unscreened	Partially programmatically accessible
11X326	Bronx Green Middle School	X135	2441 WALLACE AVENUE	6-8	6-8	102%	B	18%	17%	Unscreened	Not functionally accessible
11X370	School of Diplomacy	X113	3710 BARNES AVENUE	6-8	6-8	89%	F	11%	8%	Unscreened	Partially programmatically accessible
11X468	Pelham Academy of Academics and Community Engagement	X135	2441 WALLACE AVENUE	6-8	6-8	102%	B	10%	14%	Unscreened	Not functionally accessible
DISTRICT Choice											
11X089	P.S. 089 Bronx	X089	980 MACE AVENUE	K-8	K-8	93%	C	12%	18%	Limited Unscreened, Zoned	Not functionally accessible
11X180	M.S. 180 Dr. Daniel Hale Williams	X180	700 BAYCHESTER AVENUE	6-8	6-8	71%	C	12%	2%	Screened, Zoned	Fully programmatically accessible
11X181	I.S. 181 Pablo Casals	X181	800 BAYCHESTER AVENUE	6-8	6-8	77%	B	15%	2%	Test Outcome, Zoned	Fully programmatically accessible
11X270	Pelham Academy for Scholarship and Entrepreneurship: A College Board School	X362	921 EAST 228TH STREET	6-12	6-12	88%	D	13%	7%	Unscreened	Fully programmatically accessible
11X462	Cornerstone Academy for Social Action Middle School (CASA)	X189	3441 STEENWICK AVENUE	6-8	6-8	81%	B	9%	4%	Limited Unscreened	Fully Programmatically accessible
11X498	P.S./M.S. 498 - Van Nest Academy	X498	1640 BRONXDALE AVE	K-2,6-7	K-8	46%	N/A	10%	6%	Unscreened, Limited Unscreened	Fully Programmatically accessible
11X529	One World Middle School at Edenwald	X142	3750 BAYCHESTER AVENUE	6	6-8	66%	N/A	9%	9%	Unscreened	Not functionally accessible

11X532	Baychester Middle School	X142	3750 BAYCHESTER AVENUE	6	6-8	66%	N/A	22%	4%	Unscreened	Not functionally accessible
BOROUGH-WIDE Choice											
09X231	Eagle Academy for Young Men	X465	4143 THIRD AVENUE	6, 9-12	6-12	86%	N/A	13%	4%	Limited Unscreened	Not functionally accessible
10X225	Theatre Arts Production Company School	X137	2225 WEBSTER AVENUE	6-12	6-12	72%	C	15%	5%	Screened	Fully Programmatically accessible
10X308	Bronx Dance Academy School	X852	3617 BAINBRIDGE AVENUE	6-8	6-8	81%	B	14%	10%	Screened	Fully Programmatically accessible

CITY-WIDE Choice											
01M539	New Explorations into Science, Technology and Math High School	M022	111 COLUMBIA STREET	K-12	K-12	99%	A	0%	0.2%	Screened	Not functionally accessible
02M407	Institute for Collaborative Education	M475	345 EAST 15TH STREET	6-12	6-12	146%	B	0%	0.4%	Screened	Not functionally accessible
02M408	Professional Performing Arts High School	M017	328 WEST 48 STREET	6-12	6-12	97%	B	0%	2%	Screened	Not functionally accessible
02M442	Ballet Tech, NYC Public School for Dance	M905	890 BROADWAY	4-8	4-8	60%	B	0%	3%	Screened	Not functionally accessible
03M334	The Anderson School	M044	100 WEST 77 STREET	K-8	K-8	103%	A	0%	0.4%	Screened	Fully Programmatically accessible
03M859	Special Music School	M932	129 WEST 67 STREET	K-8	K-8	57%	A	0%	1%	Screened	Not functionally accessible
04M012	Tag Young Scholars	M117	240 EAST 109 STREET	K-8	K-8	76%	B	0%	0%	Screened	Fully Programmatically accessible
21K239	Mark Twain I.S. 239 for the Gifted & Talented	K239	2401 NEPTUNE AVENUE	6-8	6-8	79%	A	2%	1%	Test Outcome	Not functionally accessible

Comment 20 claims that the DOE has never made changes or removed any proposal to phase out a school.

The statement that the DOE has never made changes or removed any proposal to phase out a school after a joint public hearing is false. The DOE has both revised and withdrawn phase-out proposals in the past based on community feedback received, as was the case last year with the proposed phase-out of P.S. 114 Ryder Elementary in Brooklyn and the proposed phase-out of Alfred E. Smith Career and Technical Education in the Bronx the year prior.

Comment 21 refers to the PEP meeting in February and encourages all to attend.

The Panel for Educational Policy meeting will take place on February 9th, 2012 at Brooklyn Technical high school located at 29 Fort Greene Place, Brooklyn, NY. The panel will vote on the proposal to phase out Aspire at this meeting and the meeting is open to the public.

Comment 24 inquires if Aspire received any Race to the Top funding.

Aspire did not receive Race to the Top funds. However, all networks have received Race to the Top funding to support instructional initiatives among their networks of schools. As such, Aspire

may have received supports from the network that were made possible as a result of the Race to the Top funding.

Comment 26 inquires about underutilized space and how it is defined by the Department of Education.

Building space is scarce in many New York City neighborhoods. Given this reality and the growing enrollment needs of our 1.1 million students, we must use our existing public school buildings in the most efficient manner possible. We must also work to ensure that students and families in every community have high-quality educational options.

To this end, each year the DOE's Division of Portfolio Planning (Portfolio) publishes and requests school and community feedback on building utilization information and potential changes. This is a transparent process that applies consistent rules to all school buildings and considers school and community feedback prior to any decision-making.

It is important to note that a school's inclusion in the list of under-utilized buildings does not signify that a space utilization change will be proposed for that building for the 2012-2013 school year. A school's inclusion on the list is a way of formally recognizing space in the building and beginning a conversation about potential uses for the underutilized space. This list may be amended over the course of this school year.

Building X135 was not on the original underutilized list for the 2011-2012. However, the building was added to the list in the Underutilized Space Memorandum Addendum – January 25, 2012, after Aspire was proposed for phase out, because the building will become underutilized if the phase out proposal is approved. The January 25, 2012 addendum can be found here: http://schools.nyc.gov/NR/rdonlyres/6EBA8731-4A23-4E36-A528-157D795BA9CE/118275/UnderutilizedSpaceMemorandumAddendum012512.pdf.

Comment 28 inquires about the support that will be given to students who remain at Aspire while the school phases out

If this proposal is approved, Aspire will be phased out gradually over the next several years and will no longer admit new sixth-grade students after the end of this school year. Current sixth- and seventh-grade students will be supported at Aspire as they progress towards completion of middle school and transition to high school. Current eighth-grade students who meet promotional requirements will apply for high school through the Citywide High School Admissions process.

If this proposal is approved, in 2012-2013 Aspire will only serve students in seventh and eighth grades, and in 2013-2014 Aspire will only serve students in eighth grade. Aspire will close in June 2014.

Students who do not meet promotional requirements during the phase-out would continue to have access to appropriate courses to support their progress toward promotion and will continue

to be enrolled at Aspire. For example, if a current sixth-grade student does not meet promotional standards to enter seventh grade in 2012-2013, he or she will continue enrollment as a sixth-grade student at Aspire even though the school would not admit any incoming sixth-grade students. Students who do not meet promotional requirements will be provided with the appropriate support and instruction needed to meet promotion requirements, and this may include accommodating those students in existing classes, bridge classes, or pull-out classes. A "bridge class" refers to instances where a small number of students from multiple grade levels are combined and served in the same class or period by one or more teachers. A "pull-out class" refers to instances where a small group of students may be provided with targeted instruction apart from their peers for a class period. Instructional decisions are made by school leaders. Specific instructional decisions on how to serve students who do not meet promotional requirements are made by school administrators and instructional staff. In June 2014 (the final year of phase-out), any student who does not meet promotional requirements would be offered a seat at another District 11 middle school, or a middle school in the district in which the student resides.

The DOE takes seriously its obligation to provide high-quality support to students in schools that are phasing out. Supports for students in schools that are phasing out have evolved over several years as we have learned what differentiated support is needed to support these schools and students.

In September 2011, 26 schools began phasing out. These schools have received additional funding and specialized network support. Middle schools and high schools that began phasing out in September 2011 have been supported by the Phase-Out Transition Support Network.

While we don't know exactly what supports would look like for the 18 proposed phase outs and 5 proposed truncations being proposed, we do know that we will continue to establish differentiated and deliberate support to those schools and students.

If the phase-out of Aspire is approved, the school will also receive support in the areas of budget, staffing, programming, community engagement, guidance and enrollment including, but not limited to:

- Helping the school provide students with options that support their advancement, and fully prepare students for their next transition point.
- Working with school staff to foster a positive culture.
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

As part of this effort, Aspire will have a targeted action plan developed by its network. This plan will identify concrete action steps, benchmarks, and year-end goals aimed at immediately improving student achievement. This plan will outline the specific support the network will provide to the school to address the most urgent areas of need, including:

- Leadership coaching;
- Professional Development on instructional strategies for struggling students;

- Identifying grants aimed at specific needs of the school;
- Introducing new programs;
- Supporting the development of a smaller learning environment; andStaff and/or leadership changes.

Comment 32
voiced concern about the impact of school phase-outs with respect to various issues, including class size, minority and "at-risk populations," and public opposition.

Class size is primarily determined by how principals choose to program students at their school within their budget. Thus, no particular proposal, in and of itself, necessarily impacts class size. The Citywide instructional footprint relies upon the current programming at a school (number of sections) to determine the baseline footprint allocation. Decisions to co-locate schools are not based solely on the utilization figures in the Blue Book. The DOE also considers the total number of classrooms in the building and the number of sections currently programmed at all schools in the building or projected to be programmed to determine the availability of excess space and the baseline footprint for each school.

The DOE acknowledges that there some members of the schools' communities that are opposed to the proposal, and/or prioritize smaller class sizes. However, given the schools' longstanding performance struggles, we believe that phasing out certain schools and/or creating new educational options by co-locating new schools will best serve the families in these communities.

With respect to CSM's comments regarding the particular types of students who attend phase-out schools, it should be noted that schools progress report grades are based in part on a comparison of the school with peer schools serving similar populations of students. Poor performance report grades thus indicate that a school is not serving its students well, both objectively and by comparison to other schools serving similar students. Moreover, the new schools proposed to open are anticipated to serve student populations similar to the phasing out school.

Changes Made to the Proposal

No changes have been made to this proposal.