



## **Public Comment Analysis**

Date: February 8, 2012

Topic: The Proposed Phase-out of General D. Chappie James Elementary School of Science (23K631) Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

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## **Summary of Proposal**

The New York City Department of Education (“DOE”) is proposing to phase out and close General D. Chappie James Elementary School of Science (23K631, “Chappie James”), an existing zoned elementary school located at 76 Riverdale Avenue, Brooklyn, NY 11212, in Community School District 23, in building K183 (“K183”). Chappie James currently serves students in kindergarten through fifth grade and offers a pre-kindergarten program. Chappie James is currently co-located in K183 with General D. Chappie James Middle School of Science (23K634, “Chappie James Middle School”), an existing middle school that serves students in sixth through eighth grades. The DOE is proposing to phase out and eventually close Chappie James based on its low performance and its inability to turn around quickly to better support student needs.

If this proposal is approved, Chappie James would be phased out gradually over the next several years and would no longer admit new pre-kindergarten or kindergarten students after the end of this school year. Current kindergarten and first-grade students would remain at Chappie James until the end of the 2011-2012 school year and would be assigned to the new zoned elementary school, P.S. 446 (23K446, “P.S. 446”), that would open in September 2012 in the building where Chappie James is located. Current second, third, and fourth-grade students would remain at Chappie James until the end of the school year and then would continue on to the next grade level at Chappie James in September 2012; these students would be able to remain at Chappie James through graduation. Current fifth-grade students would have the opportunity to graduate from Chappie James at the end of this school year and would participate in the Middle School Choice process. These students would enroll in sixth grade at a choice middle school or their zoned middle school.

In an Educational Impact Statement (“EIS”), posted in December 2011, the DOE has proposed to open and “co-locate” P.S. 446 in K183 with Chappie James Middle School and Chappie James as it phases out. P.S. 446 would serve students in kindergarten through fifth grade when it reaches full scale in K183 in 2015-2016. A pre-kindergarten program would also be offered by P.S. 446 in K183 (pending continued availability of funding). If the proposal to co-locate P.S.

446 in K183 is approved, it would provide a new zoned elementary school option for District 23 families and replace the seats lost by the proposed phase-out of Chappie James. Chappie James is currently co-located in building K183 with Chappie James Middle School.

The details of this proposal have been released in an Educational Impact Statement (“EIS”) which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals>.

Copies of the EIS are also available in Chappie James’s main office.

### **Summary of Comments Received at the Joint Public Hearing**

A joint public hearing regarding this proposal was held at building K183 on January 23, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 106 members of the public attended the hearing and 17 people spoke. Present at the meeting were: Chancellor’s Designee, Deputy Chancellor Marc Sternberg; District 23 Community Superintendent, Ainslie Cumberbatch; Principal of Chappie James, Margaret V. McAuley; Citywide Council on Special Education (“CCSE”) Representatives, Ellen McHugh and Lucy Antoine; Chappie James School Leadership Team (“SLT”) Representative, Traci Campbell; Community Education Council (“CEC”) 23 Representative, Milton Williams.

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

1. CEC Representative Milton Williams expressed the following concerns:
  - a. The DOE is attempting to privatize the education system.
  - b. The DOE has already made up their mind about the proposed phase-out; the public cannot do anything to stop it.
  - c. The proposal will adversely affect Special Education (“SpEd”) students.
2. SLT Chairperson Traci Campbell for Chappie James raised the following questions:
  - a. The DOE proposed to close P.S. 183 and replace it with P.S. 631, another school in K183 which failed.
  - b. Why is it necessary to phase out Chappie James, when the staff is committed to the students and will make sacrifices to serve them?
  - c. What supports were offered to Chappie James when the school received its first D in 2009-2010?
  - d. The DOE has abandoned Chappie James.
3. CCSE Representative Ellen McHugh expressed concern about:
  - a. Where SpEd students will be served once Chappie James becomes P.S. 446.
  - b. The EIS does not speak to the impact the proposed phase-out will have on students, nor does it address support that was offered to parents or staff; the document only speaks to specifics about the building.
4. Council Member Charles Barron expressed his opposition to the proposed phase-out of Chappie James. He:
  - a. Requested a meeting with Deputy Chancellor Sternberg to discuss a proposed plan to turn around the school, one that was crafted by CM Barron, the community, parents and staff.

- b. Cited the lack of supports provided to Chappie James.
  - c. Asked how closing down the school will improve it. Instead, CM Barron feels as though the problem should be addressed, and we should work to improve the school rather than shut it down.
5. Multiple commenters all spoke about previous closures on the K183 campus.
  6. One commenter asked how the DOE decides to close schools.
  7. Two commenters asked why the DOE is closing schools.
  8. Multiple commenters expressed that with time and adequate resources, Chappie James would be able to turnaround.
  9. Two commenters contend that Chappie James does not receive the same resources and funding.
    - a. One of the commenters believes that Park Slope schools receive more money.
  10. One commenter asked how closing schools is the best policy for improving them.
  11. Multiple commenters cited positive educational experiences at Chappie James, and do not understand why the school warrants phase-out.
  12. Multiple commenters contend that the DOE is closing schools in order to create space and generate funds to site charter schools.
  13. One commenter inquired about the effect on Chappie James, and the other schools in the building, should a new school get approved to open in K183.
  14. Multiple commenters all contend that Chappie James was not adequately supported over the years.
  15. Multiple commenters spoke of improvements in performance at the school, and imply that the school should be given the chance to turn around.
  16. Multiple commenters note the positive leadership skill of the current Principal, and note that she just assumed her role four months ago; thus, it is premature for the DOE to close Chappie James since she was not given adequate time to turn around the school.
  17. Multiple commenters spoke of the previous failure of PS 183, and cited Chappie's current proposed phase-out.
  18. One commenter spoke of Bloomberg's new school initiative, and how many of the proposed new schools are now proposed, or have previously been proposed, for closure.

**Summary of Issues Raised During Question and Answer Period:**

19. How can parents have their voices heard?
20. What will be done differently when opening P.S. 446 than what was done in the past?
21. How will SpEd students continue to be served, and how will they be served in the new school?
22. Are you closing schools in an effort to fill your prisons with more children?
23. What new resources or special programs are you offering at the new school that were not offered to Chappie James?
24. What will you do different in four years when P.S. 446 fails?
25. Where was the strategic improvement plan when Chappie Received a D?
26. In what neighborhood are Chappie James' peer schools located?
27. Why do you want to close the school instead of helping us?
28. Why do you want to close our school?

29. Chappie James is closing yet based upon the state accountability status, the school is in good standing.

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

30. One commenter expressed confusion about the amended EIS, and did not understand what was being changed in the document.

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 Enrollment Capacity Utilization Report (“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**

- Comment 1(b) and 19 concerns the community engagement and the A190 Process.

Consistent with the DOE’s approach last year and its desire to incorporate school and community input in its decision-making process, in October and November 2011 the DOE had conversations with 47 struggling schools (41 district schools and 6 public charter schools) that were eligible for an intensive support plan or intervention. In these conversations the DOE shared information about school performance and talked with the community about their reflections of the school’s strengths and weaknesses. This engagement is above and beyond what is mandated by State law.

The goal for these engagement meetings was to begin or renew conversations with schools and their communities about their performance and the resulting actions the DOE may take to improve it. The DOE gathered feedback – to understand what is working, what is not working, and what the community has to say about it – before making a decision about whether the school should be given intensive support or phased out and replaced with a new option that can support student success.

Superintendents met with the school leadership team, staff, and parents to explain the DOE’s thinking on why the school is considered struggling and what particular factors show this to be the case.

The DOE also distributed reports for each school that summarized school performance, school supports, and potential action steps. These are easy-to-understand summaries that were handed out at the DOE feedback meetings and are posted on the DOE's website. Again, all of this happened prior to a decision about whether a school will be proposed for phase out or middle school truncation.

Prior to issuing this proposal, the DOE sought and received feedback from the Chappie James community regarding strategies to better support students and improve outcomes at the school. The DOE held meetings with the Parent Teacher Association ("PTA") and the School Leadership Team ("SLT") on October 14, 2011, to discuss possible outcomes for Chappie James due to its continued poor performance. The PTA meeting was attended by approximately 163 people. The DOE also solicited community feedback via telephone and e-mail, and created a dedicated Web site to provide information to the public: (<http://schools.nyc.gov/community/planning/changes/brooklyn/proposal?id=14>).

While parents had some positive comments about the school's administration, faculty and staff and the school's positive environment, the DOE believes that drastic action must be taken given the school's performance struggles the last few years and the very low demand for seats at the school. The DOE will incorporate community feedback as it continues to support current Chappie James students working toward promotion and as it develops plans to replace Chappie James with other schools that better meet student and community needs.

When the DOE announced its 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.

The DOE notes that at this time, the proposed phase-out of Chappie James has yet to be approved by the Panel on Educational Policy ("PEP"). This public hearing is one step in a multi-layered process, wherein the DOE engages the public for feedback. All of the commentary gathered at this hearing, and all oral and written comments received in advance of the February 9<sup>th</sup> PEP meeting, will be compiled into this analysis of public comment document. PEP members will receive a copy of the public comment analysis in advance of the PEP meeting, and will have the chance to read through the public's feedback on the proposed phase-out of Chappie James. To reiterate, no decisions on the proposed phase-out of Chappie James have yet been made. At the February 9<sup>th</sup> PEP meeting, which will be held at Brooklyn Tech High School, PEP members will vote on the proposed phase-out of Chappie James, and the proposed opening and co-location of P.S. 446.

- Comment 3(b) contends that the EIS does not address potential impact on the special education population, and that the EIS only concerns facts about building K183.

The EIS is a comprehensive document which lays out the educational impact of the proposed phase-out of Chappie James on both Chappie James, and all other school

organizations in the K183 building. The EIS includes information on the proposed impact of the proposal on the school itself, the building, and the community at large.

While there is neither a District 75 program in K183 or a District 75 inclusion program associated with any of the schools in K183, the EIS makes evident that all special education students will continue to have their needs met, even if the proposed phase-out of Chappie James is approved.

As stated in the EIS, Chappie James currently offers Integrated Co-Teaching (“ICT”) classes, Self-Contained (“SC”) special education classes, and Special Education Teacher Support Services (“SETSS”). It also has an English as a Second Language (“ESL”) program for ELL students. The existing ICT and SC classes, and SETSS, would continue to be provided as Chappie James phases out, and students with disabilities will continue to receive mandated services in accordance with their IEPs, whether at Chappie James or P.S. 446. Current students at Chappie James who receive ELL services will continue to receive ELL services as Chappie James phases out and as P.S. 446 phases in.

The DOE does not anticipate that the proposed phase-out and eventual closure of Chappie James will impact admissions, current or future student enrollment, instructional programming, partnerships, or academic or extra-curricular programs at Chappie James Middle School.

- Comment 4(a) concerns CM Barron’s request for a meeting with Deputy Chancellor Sternberg regarding a proposed plan for turning around Chappie James.

As articulated during the hearing, the Deputy Chancellor welcomes the opportunity to meet with CM Barron and the Chappie James community; the Deputy Chancellor’s office is in the process of scheduling this meeting.

- Comment 1(c), 3(a), and 21 concerns SpEd services.

SpEd students will not be adversely affected as a consequence of the proposed phase-out of Chappie James or the proposed opening and co-location of P.S. 446.

Chappie James currently offers Integrated Co-Teaching (“ICT”) classes, Self-Contained (“SC”) SpEd classes, and SpEd Teacher Support Services (“SETSS”). The existing ICT and SC classes, and SETSS, would continue to be provided as Chappie James phases out, and students with disabilities will continue to receive mandated services in accordance with their Individualized Education Programs (“IEPs”), whether at Chappie James or P.S. 446.

The proposed co-location of P.S. 446 will not affect the existing ICT and SC classes or the provision of SETSS at Chappie James, and students with disabilities will likewise continue to receive mandated services in accordance with their IEPs. Similarly, as P.S.

446 phases in, its students with IEPs will receive mandated services in accordance with their IEPs, including SC and ICT classes and SETSS, as appropriate.

Current Chappie James fifth grade students with IEPs will participate in the middle school admissions processes in the same manner as their non-disabled peers. Middle schools will be supported by the DOE in reviewing the students' IEPs to focus on addressing the needs of students with disabilities by providing individualized SpEd services models that ensure students have access to the general education curriculum to the greatest extent possible. It is expected that the middle school to which a student is matched will provide individualized SpEd services to meet the student's needs.

- Comments 9 and 9(a) concern equality of funding and resources.

In New York City, the DOE funds schools through a per pupil allocation. That is, funding “follows” the students and is weighted based on students’ grade level and need (incoming proficiency level and special education/English Language Learner/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. Even if the Department of Education had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls.

- Comment 2(b), 4(c), 8, 11, 15, 16, 27 concerns Chappie James’ performance and its ability to turn around.

Chappie James 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.

The overwhelming majority of Chappie Elementary students remain below grade level in English and Math. In 2010-2011, only 26% of students were performing on grade level in English – putting the school in the bottom 7% of elementary schools Citywide in terms of English proficiency. Only 35% of students were performing on grade level in Math – putting the school in the bottom 8% of elementary schools Citywide in terms of Math proficiency.

In 2009-2010, Chappie James was in the bottom 8% in Citywide Math proficiency and in the bottom 10% in Citywide English proficiency. In 2008-2009, Chappie James was in the bottom 3% in Citywide Math proficiency and in the bottom 6% for Citywide English proficiency.

Chappie James is not adequately helping students to make progress. In 2010-2011, Chappie James was in the bottom 11% of elementary schools Citywide in terms of learning growth in English and the bottom 14% of elementary 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, Chappie

James students will fall farther behind their peers in other schools.

Further, the school's attendance rate is one of the lowest among elementary schools Citywide. The 2010-11 attendance rate was 90% compared to the Citywide elementary school average of 93.6%, putting Chappie James in the bottom 7% of New York City elementary schools in terms of attendance. Additionally, Chappie James is a zoned school but only 33% of students residing in its zone chose to attend the school, suggesting that families are seeking better options.

- Comments 2(a), 5, 17, 18, 20, 23, and 24 concerns phase-out of new schools.

This year, the DOE is proposing to phase out 7 schools and truncate 3 schools that were opened under this Administration (since 2002). These 10 schools represent less than 3% of the schools opened since 2002.

The DOE counts on each of its schools to provide a high-quality education to its students—and the DOE holds all of them to the same high standard. If a school is not getting the job done for students – whether it was opened recently or not – the DOE is compelled to take serious action to ensure its students do not fall even further behind.

In a 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. The DOE simply cannot stand by and allow schools to keep failing our kids when it knows it can—and it 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.

The DOE's new schools are overwhelmingly getting the job done for students, and when they are not, and a school is struggling, the DOE follows the same process to phase out and replace that school.

In terms of inherent differences between Chappie James and the proposed new elementary school, P.S. 446 would be led by a new Principal. The Office of New Schools ("ONS") selects new school leaders using a rigorous, four phased process that assesses aspiring principals around core areas of Personal Leadership, Instructional Leadership, Community Leadership, and Student Support.

Once ONS approves new leaders and matches them to school sites, ONS will subsequently work with each Principal during the New Schools Intensive, an ongoing workshop that equips these leaders with the necessary tools so that they are ready to open a new school. As a part of the New Schools Intensive, ONS leads weekly workshops focused on different aspects of school startup, and matches new leaders with visits to exemplary schools so that these leaders can see, firsthand, examples of existing successful schools that are implementing specific aspects of their school models. ONS also provides a set of deliverables that the new leaders must produce and community engagement that they must see through, in addition to providing them with various other new school start up tools in an effort to ensure that each new leader is well prepared to open his or her new school come September.

All teachers, administrative and non-pedagogical staff at Chappie James would be excessed over the course of the phase-out. This process would take place gradually as student enrollment declines with each successive graduating class. With fewer students, the school's staffing needs will naturally be reduced.

P.S. 446 would need to hire additional teachers during each year of the grade expansion as the total number of students enrolled in the school increases over each of the next three years. The precise number of positions needed for the 2012-2013 school year would be determined once annual enrollment projections are released in the spring of 2012. Similarly, the number of new positions created to serve students in sixth through eighth grade would be determined based on annual enrollment projections available as the school grows to serve those grades.

New schools follow the hiring process consistent with the procedures set forth in the collective bargaining agreement between the DOE and UFT. New schools hiring that have an impact on a school that is closing or phasing out, shall be required to hire no less than 50% of the most senior qualified staff from the closing or phasing out school, if sufficient number of staff apply, until the impacted school is closed.

- Comments 1(a) and 12 concern charters and private space.

To reiterate, the DOE is currently proposing to phase-out Chappie James, and to open and co-locate a new, district elementary school in K183; at this time, the DOE does not have any other plans for the space.

The DOE seeks to provide space to high quality education options for all students, regardless of whether they are served in DOE or public charter schools. The DOE welcomes public charter schools to lease or provide their own space, but will offer space in DOE schools where it is feasible to do so. The DOE does not lease space directly for charter schools; a charter interested in parochial school space would have to acquire or lease that space with private funds.

- Comment 6, 7, 10, 15, 16, 22, 27, and 28 relate to the process by which the DOE decides to phase out a school and why the DOE decided to phase out Chappie James.

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

First the DOE compiles a preliminary list 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 most recent 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 elementary schools, middle school, and high schools: received a recommendation on its most recent Joint Intervention Team (“JIT”)<sup>1</sup> review for significant change in organizational structure or phase out/closure.

Next, the DOE applies additional criteria to determine which schools are most in need of support or intervention. The DOE removes from consideration schools that meet any of the following criteria:

- high schools that have a higher graduation rate than the Citywide average. The Citywide average for 2010-2011 was 65.1%; and/or
- elementary and middle schools that have a higher ELA and Math average proficiency than their district average or the Citywide average (whichever is lower). The Citywide average for 2010-2011 is 50.6% proficient; and/or
- schools that received an A or B on the 2010-2011 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 2010-2011.

Schools that are removed from consideration for the most intensive support or intervention will receive differentiated support from their CFN team.

The remaining schools, which represent the schools that are struggling the most, are further investigated for more serious interventions that may include phase-out/truncation and replacement. The DOE considers 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

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<sup>1</sup> A JIT review is an SED mandated intervention designed to assess a school’s educational program, using multiple measures of quantitative and qualitative information, and to make recommendations.

- school safety data.

In addition to understanding the data, the DOE also works 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 early engagement meetings at these schools, the DOE heard from constituents about what is working and what is not before making a decision about the supports or interventions that can best support student outcomes.

For the majority of schools the DOE investigates, it hopes that the school can turnaround. To that end, the DOE 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, the DOE is left with a set of schools that it knows – 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 multistep process, the DOE’s analysis and engagement directed it 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 the DOE is compelled to act based on its 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 the DOE makes. But it is the right thing to do for the students of New York City.

In this specific case, through a thorough review process, it was determined that Chappie James was not delivering a high quality educational option for all of its students. Chappie James earned an overall F grade on its 2010-2011 Progress Report. On the 2009-2010 Progress Report, Chappie James earned a D grade.

As a result, the DOE initiated a comprehensive review of Chappie James with the goal of determining what intensive supports and interventions would best benefit the Chappie James community. During that review, the DOE looked at recent and historical performance, consulted with superintendents and other experienced educators who have worked closely with the school, and gathered community feedback.

After completing that review, the DOE believes that only the most serious intervention—the gradual phase-out and eventual closure of Chappie James—will best serve students and the community. Phasing-out and closing Chappie James will allow for new school options to develop in K183 that are intended to provide better options for families. The DOE has taken action to ensure that students in this community do not fall further behind their peers.

- Comment 29 concerns the State’s PLA list.

The New York State School Report Card is an important part of the State's effort to raise the learning standards for all students. The Report Card provides information to the school community on the school's status under the State and federal accountability systems. The Report Card also presents information on a school's strengths and weaknesses that can be used to improve instruction and student services.

While the DOE acknowledges that Chappie James status in both 2009-2010 and 2010-2011 was 'in good standing,' The PLA list is only one of the factors used in compiling a preliminary list of schools for investigation as stated above. The NYC DOE Progress Report though, heavily weights student growth and proficiency, with proficiency as an important primary assessment. The DOE looks at a combination of proficiency and growth when making its assessments about a school's quality, and its capacity to turnaround. That being said, it is in these categories (proficiency and learning growth) that Chappie James has struggled the most. As previously stated, in 2010-2011, only 26% of students were performing on grade level in English – putting the school in the bottom 7% of elementary schools Citywide in terms of English proficiency; only 35% of students were performing on grade level in Math – putting the school in the bottom 8% of elementary schools Citywide in terms of Math proficiency.

In regards to learning growth, in 2010-2011, Chappie Elementary was in the bottom 11% of elementary schools Citywide in terms of learning growth in English and the bottom 14% of elementary schools Citywide in terms of learning growth in Math.

- Comments 2(d) and 13 concerns how Chappie James will be supported throughout the phase-out period.

While the DOE knows that phasing out and replacing Chappie James is the right decision for this community, it takes seriously the obligation to provide high-quality support to students in schools that are phasing out. Supports for students in phase-out schools has evolved over several years as the DOE has learned what differentiated support is needed to support these schools and students.

The DOE acknowledges that many members of the local community love Chappie James, and that the decision to phase-out the school is an incredibly difficult one for students and families that remain very connected to the school. That being said, if the proposed phase-out is approved, schools 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.

This past year, 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 the DOE does not know exactly what supports the 19 schools that are proposed for phaseout this year, including Chappie James, or the 6 schools that are proposed for truncation will receive, it does know that it will continue to establish differentiated and deliberate support to those schools and students. These supports should help to continue a positive trend seen in phasing out schools, specifically that, as high schools phase out, the four-year graduation rate rises as the dropout rate falls.

- Comment 13 concerns the effect of opening a new school in K183 on Chappie James, and the other schools in the building, including whether there is space for Chappie James and the other schools in K183 once P.S. 446 begins to phase-in.

There are currently hundreds of schools in buildings across the City that are co-located; some of these co-locations are multiple DOE schools while others are DOE and public charter schools sharing space. In all cases, the Instructional Footprint is applied to both DOE and public charter schools to ensure equitable allocation of classroom, resource and administrative space.

The DOE seeks to fully utilize all its building capacity to serve students. The DOE does not distinguish between students attending public charter schools and students attending DOE schools. In all cases, the DOE seeks to provide high quality education and allow parents/students to choose where to attend.

Although K183 has the capacity to serve 751 students, currently, there are 612 students, including pre-kindergarten students, enrolled in K183, yielding a utilization rate of 81% of target capacity. Once P.S. 446 has completed its expansion and Chappie James has completed its phase-out, there will be approximately 606-696 students served in the building, including the pre-kindergarten enrollment. Projected utilization for 2015-2016 is 81-93%. Therefore, the DOE believes there is sufficient space to accommodate Chappie James Middle School, Chappie James during the course of its phase-out, and P.S. 446 during the course of its phase-in.

Further, according to the building walk-through conducted by the Office of Space Planning on December 9, 2011, K183 has a total of 49 full-size rooms, including 1 full-size science laboratory, 3 half-size rooms, and the equivalent of 2.5 full-size rooms of designed administrative/office space. Thus, building K183 has a total of 53 full-size equivalent (“FSE”) rooms for instructional and administrative use. The building also has the following rooms, which are currently shared amongst the co-located schools: a cafeteria, an auditorium, a library, and a gymnasium. The School-Based Support Team (“SBST”) is housed in 1 full-size room; the nurse’s office is housed in 1 full-size room of designed administrative/office space, and the custodian’s office is housed in 1 half-size

room. The science lab, which is currently allocated to Chappie James Middle School, will remain allocated to Chappie James Middle School.

Per the Footprint, Chappie James Middle School should be allocated 9 full-size rooms, 4 half-size rooms, and the equivalent of 2.5 full-size rooms for administrative use, which totals 13.5 FSE rooms. The DOE has adjusted Chappie James Middle School's baseline Footprint allocation because building K183 does not have a sufficient number of half-size rooms. Chappie James Middle School's adjusted baseline Footprint allocation, which corresponds to the rooms that exist in the building, includes 12 full-size rooms, 1 half-size room, and the equivalent of 2.5 full-size rooms for administrative use, which totals 15 FSE rooms. Chappie James Middle School's total baseline Footprint allocation will remain constant over the course of this proposal and beyond as the school's total student enrollment is projected to remain constant.

Per the Footprint, Chappie James should be allocated 21 full-size rooms, 5 half-size rooms, and the equivalent of 3.0 full-size rooms for administrative use, which totals 26.5 FSE rooms. The DOE has adjusted Chappie James's baseline Footprint allocation because building K183 does not have a sufficient number of half-size rooms. Chappie James's adjusted baseline Footprint allocation, which corresponds to the rooms that exist in the building, includes 25 full-size rooms and 3.0 full-size rooms for administrative use. Therefore Chappie James's total adjusted baseline Footprint allocation is 28.0 FSE rooms.

If the proposal to phase out Chappie James is approved, the enrollment and grade levels served will decrease each year. Beginning in 2012-2013, the first year of phase out, Chappie James' adjusted baseline Footprint allocation will decrease by three full-size rooms each year. The space vacated by Chappie James will be back-filled by P.S. 446 as P.S. 446 phases in.

Per the Footprint, in 2012-2013, during the first year of this proposal, P.S. 446 will be allocated 14 full-size rooms for instructional use and the equivalent of 2.5 full-size rooms for administrative use. Each subsequent year, up to the 2014-2015 school year, P.S. 446 will be allocated four additional full-size rooms to accommodate its increased enrollment and grade span.

In 2011-2012, there were 10 full-size rooms in excess above the total combined baseline footprint allocations of the organizations in the building. In 2012-2013, after each school has received its adjusted baseline Footprint allocation there will be 3 full-size rooms and 1 half-size excess rooms remaining in the building. These excess rooms will be divided among the schools by the Building Council. In the last year of Chappie James' phase out and P.S. 446's phase-in, in 2014-2015, there will be 9 full-size rooms and 1 half-size excess rooms remaining in the building. These excess rooms will be divided among the schools by the Building Council.

The table below provides the adjusted baseline Footprint allocations of full-size instructional rooms for each school throughout Chappie James' phase out and the phase

in of P.S. 446:

<b>Total Adjusted Baseline Footprint Allocation of Full-Size Rooms</b>					
<b>School Name</b>	<b>2011-12 (current)</b>	<b>2012-13</b>	<b>2013-14</b>	<b>2014-15</b>	<b>2015-16</b>
Chappie James	25	14	8	5	N/A
Chappie James Middle School	12	12	13	13	13
P.S. 446	N/A	14	18	20	21
<b>Total</b>	<b>37</b>	<b>40</b>	<b>39</b>	<b>38</b>	<b>34</b>

During the course of Chappie James’s phase out and P.S. 446’s phase-in, the number of excess rooms will decrease as P.S. 446’s baseline Footprint allocation increases to reflect its larger population and full grade span.

The Office of Space Planning will work with the Building Council to ensure an equitable allocation of the excess space. In determining an equitable allocation, the Office of Space Planning may consider factors such as the relative enrollments of the co-located schools, the instructional and programmatic needs of the co-located schools, and the physical location of the excess space within the building.

The DOE does not anticipate that there will be any immediate proposed changes to available academic or extracurricular programs currently offered at Chappie James. That said, the availability of certain offerings at the school would inevitably be impacted as the school phases out, serves an increasingly smaller student population, and eventually closes.

With respect to academics, Chappie James would continue to offer all necessary classes to support current students as they work to meet promotional requirements. As total enrollment at the school shrinks, the school may scale back its special programs and initiatives or enrichment classes. It is difficult to predict how those changes might be implemented as decisions will rest with school administrators and will be made based on student demand as well as staff and budget conditions at the school.

The DOE does not anticipate that the proposed co-location of P.S. 446 will impact admissions, current or future student enrollment, instructional programming, or academic or extra-curricular programs and partnerships at Chappie James Middle School. Chappie James Middle School would continue to offer extracurricular programs based on student interests, available resources, and staff support for those programs. The proposed co-location would not impact those opportunities. Students would continue to have the opportunity to participate in a variety of extracurricular programs, though the specific programs offered at a given school are subject to annual change based on student demand and available resources.

Additionally, the DOE does not anticipate that this proposal will affect the ability of Chappie James Middle School to meet the needs of its current or future students with disabilities. Chappie James Middle School currently offers SETSS, SC, and ICT classes

- Comment 2(c), 3(b), 4(b), 8, 9, 9(a), 14, 16, 25 concerns supports provided to Chappie James.

While the DOE acknowledges that staff members have worked hard to improve Chappie James over the years, even with support the school has not produced adequate outcomes for students. While the DOE acknowledges that Chappie James underwent changes in leadership over the past year, the DOE offered the following comprehensive school supports over the course of the past three years:

#### Leadership Support:

- Provided 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.
- Coached and trained leadership on implementing plans in support of Citywide instructional initiatives and teacher effectiveness.
- Provided extensive support in assisting leaders to create a professional development plan to support teachers in curriculum development, instruction, and strategies to support struggling students to raise teacher practice and improve student achievement.

#### Instructional Support:

- Supported and trained teachers in creating curriculum maps, strategies aimed at addressing various students' entry points into content, and other instructional tools to raise teacher practice and improve student achievement.
- Facilitated training for teachers in assessment design and the creation of rigorous tasks and rubrics aligned to Citywide instructional initiatives.
- Provided professional development opportunities for teachers on literacy instruction and the development of best practices within the English Language Arts curriculum, including lesson models, questioning strategies, and lesson planning.
- Worked with teacher teams to deepen practice and share best practices on utilizing data and technology in order to raise student achievement.

#### Operational Support:

- Advised school staff on budgeting, human resources, teacher recruitment, and building management.

#### Student Support:

- Trained 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.
- Provided support for developing online learning systems to support students in improving skills in mathematics.

Despite the availability of these supports, it is apparent that Chappie James has failed to develop the proper infrastructure to meet the needs of its students and families.

- Comment 26 concerns Chappie James' peer group.

Each school's performance is compared to the performance of schools in its peer group. Peer schools are those New York City public schools with a student population most like the school's population, according to the peer index. Each elementary and middle school has up to 40 peer schools and each K-8 school has up to 30 peer schools.

Please refer to Chappie James' Progress Report to see the entire peer group, which consists of over 40 schools; the DOE notes that Chappie James' peer group schools are located across all of Brooklyn, and the city at large. The complete peer group can be found in the school's Progress Report at:

[http://schools.nyc.gov/OA/SchoolReports/201011/Progress\\_Report\\_2011\\_EMS\\_K631.pdf](http://schools.nyc.gov/OA/SchoolReports/201011/Progress_Report_2011_EMS_K631.pdf)

- Comment 30 concerns confusion surrounding amendments to the proposal.

The DOE did not amend the EIS. On December 22, 2011, the DOE published an amended Panel on Educational Policy Notice to correct an error in the address where the joint public hearing was being held.

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.