



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Phase-Out of Samuel Gompers Career and Technical Education High School (07X655), Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

On December 22, 2011, the New York City Department of Education (“DOE”) issued a proposal to phase out Samuel Gompers Career and Technical Education High School (07X655, “Samuel Gompers”) based on its poor performance and the DOE’s assessment that the school lacks the capacity to turn around quickly to better support student needs. Samuel Gompers is located in building X655 at 455 Southern Boulevard, Bronx, NY 10455, within the geographical confines of Community School District 7 (“District 7”).

On February 3, 2012, the DOE amended the Educational Impact Statement (“EIS”) concerning the proposed phase-out of Samuel Gompers to make various edits and to reflect the fact that New Visions Charter High School for Advanced Math and Science II (84XTBD, “AMS II”) is no longer proposed to be co-located in building X655; instead, it is proposed that New Visions Charter High School for the Humanities II (84XTBD, “HUM II”) be co-located in building X655.

If the proposal to phase out Samuel Gompers is approved by the Panel for Educational Policy (“PEP”), Samuel Gompers would no longer admit new ninth-grade students after the conclusion of the 2011-2012 school year and would continue to phase out one grade at a time until June 2015, when it would close.

Students currently attending Samuel Gompers would be supported as they progress towards graduation while remaining enrolled at Samuel Gompers. In cases where students do not complete graduation requirements by June 2015, the DOE would help those students and their families identify alternate programs or schools that meet their individual needs so that students may continue their education after Samuel Gompers completes its phase-out.

Summary of Comments Received at the Joint Public Hearing

A Joint Public Hearing regarding this proposal was held at building X665 on February 2, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 334 members of the public attended the hearing, and 53 people spoke. Also present at the meeting were: Joyce Mills Kittrell, Principal of Samuel Gompers; Samuel Gompers School Leadership Team (“SLT”) representatives Emilio Martí and Maribel López; Neyda Franco from Community Education Counsel (“CEC”) 7; Otis Thomas from CEC 8; Evelyn Rodríguez from the Citywide Council on High Schools (“CCHS”); Yolanda Torres, Community Superintendent for District 7; Geraldine Taylor-Brown, Bronx High School Superintendent; and Deputy Chancellor Shael Suransky.

The following comments and remarks were made at the Joint Public Hearing

1. Samuel Gompers SLT representative Emilio Martí spoke against the proposal. As the parent of a Samuel Gompers student and himself a participant in evening adult education program, he believes that the school should not close because it offers great programs for students and members of the community.
2. Samuel Gompers SLT representative Maribel López spoke against the proposal for the following reasons: (a) this is the first year in which the school received an F grade on the Progress Report; (b) the school did better in terms of student performance when it had a screened admissions method; (c) the school’s graduation rate reflects the fact that it serves a high percentage of students with disabilities; and (d) the DOE should invest in the school’s CTE programs.
3. Evelyn Rodríguez, a representative from the CCHS, spoke against closing Samuel Gompers because the Bronx needs more information technology schools. She also spoke about her son’s success in the school.
4. Multiple commenters asked about what kinds of supports the DOE has provided to Samuel Gompers.
5. Multiple students spoke about their positive experiences at the school and said they have learned and improved a lot since they have been attending the school.
6. Multiple commenters stated that the DOE did not intend to listen to the community and that the DOE has already made a decision to phase out the school.
7. Multiple commenters stated that the DOE is trying to privatize public education by opening new charter schools. They also stated that charter schools are not meant for poor students of color.
8. Multiple commenters stated that closing CTE schools across the borough is causing chaos and that CTE schools are viable options for students and therefore these schools should not be closed.
9. Multiple commenters spoke about the importance of CTE programs and providing training to the next generation of workers.
10. Multiple commenters urged the DOE to withdraw the proposal.
11. Multiple commenters stated that the CTE programs offered at Samuel Gompers should not disappear.
12. A commenter asked the DOE to open a new information technology school in the Samuel Gompers campus.

13. A teacher spoke about her career at Samuel Gompers and the fact that she felt honored to serve her students.
14. A parent spoke about her son's positive experience at the school. Her son is a special education student and Samuel Gompers has provided her son with multiple opportunities to learn and grow.
15. A commenter stated that the DOE is closing schools that offer computer and information technology programs and that it is replacing those programs with less desirable options such as Tourism and Hospitality.
16. Multiple graduates of Samuel Gompers spoke about the many opportunities the school had granted them to become successful after graduating from the school.
17. Multiple commenters stated that Samuel Gompers is a great school and that it should not close.
18. A commenter stated that Samuel Gompers had historically been a school for boys and asked what kinds of new programs the DOE plans to put in place to attract female students, especially in the sciences.
19. A commenter stated that 11 of the schools proposed for closure this year were opened during the Bloomberg administration. The commenter believes that closing schools and opening new ones in their place is not a good strategy for improving schools, especially in economically disadvantaged communities. The commenter also stated that the Bloomberg administration should take more responsibility for failing schools.
20. A commenter stated that Samuel Gompers has been a pillar in the community, with a history of over 70 years of service to the community. The school has developed partnerships with Con Edison, Cisco, Verizon, and Xerox. These partnerships have strengthened the school's curriculum and as a result students are better prepared for the job market.
21. A commenter stated that the reason the school had a low attendance rate last year was because students and their families were dealing with housing and economic issues.
22. A commenter stated that the school has outdated history textbooks.
23. A commenter stated that the money used to open a new charter school at Samuel Gompers should be given to Samuel Gompers instead.
24. A commenter asked why the DOE is firing the good teachers.
25. A commenter stated that 25% of Samuel Gompers students have Individualized Education Programs, that the school has the highest concentration of students in Self-Contained special education classes, that 30% of students are English Language Learners, that 85% of incoming ninth graders were levels 1 and 2, and that the Citywide graduation rate for special education students is 30%. The commenter stated that the school should not be expected to succeed given these statistics.
26. A commenter asked how schools are supposed to improve when cuts are made to their budgets.
27. Multiple commenters asked how the DOE plans to support students at Samuel Gompers during the course of its phase-out.
28. A commenter asked if the adult education programs offered at night at Samuel Gompers will continue to exist if the school is phased out.
29. A commenter stated that Gompers is the only CTE school in the Bronx that offers CISCO Networking.

30. A commenter stated that only 13% of Black and Latino students in New York City graduate college ready.

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

The DOE received four written comments via e-mail and two comments via the dedicated phone line for this proposal.

31. A parent stated that instead of closing Samuel Gompers and opening two new schools in its place the DOE should help Samuel Gompers to improve.
32. A parent asked why the DOE is proposing to close Samuel Gompers.
33. A parent wrote that Samuel Gompers needs help to improve instead of closing the school.
34. A teacher wrote that Samuel Gompers needs more support like hiring more teachers.
35. A parent wrote that Samuel Gompers offers great CTE programs and that the school should not close.
36. Class Size Matters (“CSM”) submitted written comments objecting to the phase-out of CTE programming in the Bronx. The CSM comments can be summarized as follows: (a) The DOE did not adequately disclose the overall impact on total CTE seats available in the Bronx; (b) the replacement schools will not fully replace the different types of CTE programs currently offered in the Bronx; (c) the new CTE programming that the DOE will offer in the Bronx is incompatible with student demand; (d) the new CTE programs are unlikely to receive State approval promptly; and (e) the DOE will be unable to continue offering CTE programming during school phase-out, as stated in the EISs.

The following comments and remarks were made at the Joint Public Hearing that were not related to the proposal

37. Multiple commenters stated that community members should hold public officials accountable for school closures.
38. Multiple students spoke about the issue of scanning students for weapons at the school.
39. A commenter spoke about the DOE’s special education reform and its impact on students.
40. A commenter stated that the DOE is proposing 33 more schools for Turnaround and closure.

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

- In response to comments 1 and 28 regarding the availability of adult education programs at Samuel Gompers in light of the proposed phase-out: Samuel Gompers offers the following night programs for adults: (1) Cisco networking; (2) Microsoft Applications; (3) Computer Repair; and (4) Electrical Installation. These programs are expected to be offered throughout the course of the phase-out based on continued demand.
- In response to comments 1, 2, 3, 5, 13, 14, 16, 17, 20, and 35 which discuss the positive aspects of the school and its standing in the community: The DOE acknowledges the

positive experiences of some students and staff at Samuel Gompers over the years. However, the decision to propose the school for phase-out is driven by a commitment to helping all students succeed and the performance of Samuel Gompers over the past three years suggests that the majority of students have not graduated from the school.

In addition, the DOE recognizes the important role that schools play in their communities and knows that schools throughout the city are not just educational institutions, but rich and tight-knit communities. The DOE expects that the schools proposed to replace Samuel Gompers will be fully engaged with the community and will continue to play a vital role as an anchor for the community.

- In response to comment 2 regarding performance, admissions, and students with disabilities at Samuel Gompers: First, 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 in terms of grade span, demographic composition, and/or average incoming State exam scores. In 2010-2011, Samuel Gompers earned an overall F grade on its annual Progress Report and its Progress Report score was in the bottom 1% of high schools Citywide. The school's Progress Report grades during the past two years, an overall D grade in 2008-2009 and an overall C grade in 2009-2010, suggest that the school has struggled for several years and that performance has declined even further as evidenced by last year's F on the Progress Report.

The DOE places greater importance (and weight in the Overall Progress Report grade) on the progress a school makes with its students, regardless of whether they make sufficient academic gains to achieve proficiency. Other schools in Samuel Gompers's peer schools have achieved far better results with similar students. For example, Fannie Lou Hamer Freedom High School, an existing DOE high school in the Bronx which serves 27% students with Individualized Education Programs ("IEPs"), received an overall A grade on the 2010-2011 Progress Report and had a four-year graduation rate of 59%. In contrast, Samuel Gompers, which also serves 28% of students with IEPs, received an F grade on its Progress Report and had a graduation rate of 41%, which put the school in the bottom 1% of high schools Citywide in terms of graduation rates. The DOE believes that Samuel Gompers can do better for its students regardless of students' needs.

Finally, despite the commenter's contention that the school performed better when it had a screened admissions method, Samuel Gompers does continue to offer three screened programs in the interest areas of Engineering and Virtual Art & Design. The selection criteria for all three screened programs are as follows:

- English (75-100), Math (75-100), Social Studies (75-100), Science (75-100)
- Standardized Test Scores: Math Level(s) 3-4, English Language Arts Level(s) 3-4
- Review of Attendance and Punctuality

In addition, the school offers one educational option program in the interest area of Computer Science & Technology.

- In response to comments 3, 12, and 15 regarding the need for information technology schools in the Bronx: For next year, there will be 5 high schools in the Bronx that will offer programs in the information technology CTE career cluster, including Crotona International High School, a new school that opened in the Grace Dodge Educational Campus in September 2011. The DOE believes in the importance of creating and supporting programs that are in high demand. To support this effort, the DOE will continue to work with schools and partners to strengthen existing programs and create new ones in the Bronx.
- In response to comments 4, 31, 33, and 34 concerning supports offered to Samuel Gompers: Samuel Gompers has received individualized support plans as well as centralized services that the DOE provides to all schools—yet despite this extensive assistance, the school has not produced adequate outcomes for students and families. To help the school’s efforts to improve performance, the DOE offered numerous supports, including:

Leadership Support:

- 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.
- Coaching and training leadership on implementing plans in support of Citywide instructional initiatives.
- Training and supporting leadership in systems and strategies for monitoring credit accumulation in order to increase graduation rates.

Instructional Support:

- Supporting and training teachers in the Writing Matters Curriculum and providing other tools and strategies for improving literacy instruction and raising student outcomes.
- Facilitating training for teachers in assessment design, curriculum mapping, and student feedback collection as tools aimed to meet standards and improve expected student outcomes.
- On-site support that focused on individualized goals and strategies for helping teachers improve their practice.
- Professional development opportunities for staff on best practices and approaches to raising achievement among students with disabilities.
- Training for staff as to ways to incorporate data analysis and other tools to understand student progress and thus increase student outcomes.

Operational Support:

- Advising school staff on managing budgeting, human resources, teacher recruitment, and building logistics.
- Supporting school staff in developing strategies and practices for improving student

attendance.

- Information to school administrators regarding grants and other funding opportunities on a regular basis.

Student Support:

- Training the School Based-Support Team in comprehensive guidance programs and evidence-based counseling strategies to enable them to better provide social and emotional support to students at the school.
- Supporting the implementation of curriculum aimed at anti-bullying, tolerance, and diversity initiatives to foster a supportive and safe environment for all students.
- Advising in college-readiness workshops and implementing school-wide supports aimed at increasing college interest and effective college planning.

CTE-Specific Support:

- Advising and supporting school leadership in the process to gain approval for CTE programs.
 - Providing opportunities and training for school administrators and CTE coordinators to develop their capacity with Carl D. Perkins Vocational and Technical Education Act (“VTEA”) funding and CTE data management to further the CTE mission and vision at the school.
- In response to comment 6 regarding community feedback: The DOE welcomes all feedback from the community regarding a proposal. When the Educational Impact Statement regarding the proposed phase-out of Samuel Gompers was issued, the document was made available to the staff, faculty, and parents and on the DOE’s Web site. In addition, the DOE dedicates a proposal-specific Web site and voicemail to collect feedback on this proposal. Furthermore, all schools’ staff, faculty and parent communities are invited to the Joint Public Hearing to solicit further feedback. The DOE has given thoughtful consideration to this input. All of these comments have been summarized and analyzed in this document which is made available to the PEP prior to their vote on the proposal.
 - In response to comment 7 regarding student demographics at charter schools: Charter schools are public schools, not private entities. Charter Schools serve the communities they reside in. Students are admitted to charter schools through an application lottery that gives preference to students who live in the community school district in which the charter school is located. Like other district DOE schools, charter schools serve students with disabilities and English Language Learners. Overall, Bronx charter schools serve 81% of students who qualify for free or reduced lunch, 11.1% of students who have Individualized Education Programs, 9.3% of students who are English Language Learners, 43.6% of students who scored proficient on their English Language Arts State exam, and 68.9% of students who scored proficient on their Mathematics State exam. The ethnic/racial breakdown of students attending charter schools Citywide according to

Automate The Schools (“ATS”), as of December 16, 2011, is as follows: 52.6% Hispanic, 43.1% Black, 1% White, 1.2% Asian, and 2.1% Other.

- In response to comments 2, 8, 9, 11, 15, and 18 regarding CTE available options for students and the importance of CTE schools:

The DOE strongly believes in the importance of providing high-quality CTE programs for students across the city. This year, the DOE is proposing to phase out two CTE high schools in the Bronx in addition to Samuel Gompers. The DOE believes that all students deserve a high-quality education and unfortunately these schools have struggled for several years to prepare students for high school graduation and careers in the workforce.

At the same time, the DOE is proposing to open four new CTE high schools in the Bronx. These four schools are intended to provide new options for students and families in the borough in light of the proposed phase-outs of Grace Dodge, Samuel Gompers, and Jane Addams. The new CTE schools are meant to replace the seats lost through those phase-outs.

The DOE engaged the New York City Labor Market Information Service to identify sectors within the local labor market that are most likely to provide stability and opportunity for CTE graduates— immediately upon graduation and in the years to come. The following CTE career pathways being created at new CTE schools proposed to open in September were selected in response to overall demand from students applying to CTE programs, demand from industry partners interested in hiring graduates with CTE endorsed diplomas, as well as labor trends and analysis of workforce needs:

- Science, Research, and Engineering
- Health Sciences
- Business Management
- Administration and Hospitality and Tourism
- Hospitality and Tourism

The DOE began this work last year when it opened two new CTE schools in the Bronx: Crotona International (which opened in the Grace Dodge campus) and Bronx Design and Construction Academy (which opened in the Alfred E. Smith campus). Crotona International, which serves ELL students, currently offers a program in the Information Technology career cluster, meeting some of the need and demand for programs in this field, as mentioned in the response to comments 3, 12, and 15.

The DOE believes that these new options will better serve the community by raising the bar for student achievement, especially in communities where schools like Samuel Gompers have failed to do so for several years in a row.

Finally, the DOE plans to create another educational option for students in this community assuming space becomes available in the building.

The DOE expects that both male and female students will be drawn to these new CTE offerings.

- In response to comment 10: The DOE has considered public input but has not withdrawn this proposal. This proposal is still being considered by the PEP at its February 9, 2012 meeting.
- Comment 19 notes that several of the schools opened under the Bloomberg administration are proposed for phase-out and that the administration should take more responsibility for failing schools: This year, the Department 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 holds 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—the DOE is compelled to take serious action to ensure its students don't 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 can't stand by and allow schools to keep failing students when it can—and must—do better. New York City's new schools strategy has helped us to deliver on the core promise to NYC families to provide *all* students with an excellent education.

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

- In response to the portion of comment 20 regarding the partnerships at Samuel Gompers: The DOE notes that the partnerships offered by Samuel Gompers would continue to exist during the school's phase-out, though the specific programs and partnerships offered may change. That is true for any City student as all schools modify offerings annually based on student demand and available resources. The proposed new school is also expected to partner with community-based organizations to provide programming for its students.

Additionally, as Samuel Gompers phases out and the new schools phase in, the DOE will work to assist in continuing these partnerships and/or developing new ones to further assist the CTE curriculum.

- In response to comments 21 and 25 indicating that the school’s poor performance and attendance are caused by the demographic features of its student population (e.g., low-income, special needs, ELL needs): As described earlier in this Analysis of Public Comments, 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 this school’s population, according to the peer index. Each high school has up to 40 peer schools. The peer index for Samuel Gompers is based on: average eighth grade English and Math proficiencies, percentage of students with disabilities, percentage of students in self-contained settings, and percentage of incoming students who are overage at the time of entry into the ninth grade. Based on these factors, other schools in Samuel Gompers’ peer schools have better attendance rates and overall better student outcomes. Both Samuel Gompers and Harry S. Truman High School, an existing Bronx high school, serve a similar population of students with IEPs, overage students, and students in self-contained sections. The percentages for Samuel Gompers are 27%, 16%, and 12%, respectively for these populations. As for Harry S. Truman, those numbers are 23%, 13%, and 11%, respectively. Yet Harry S. Truman’s four-year graduation rate is at 62% compared to 41% at Samuel Gompers. Harry S. Truman’s attendance rate is also higher at 59% compared to 48% at Samuel Gompers. These statistics show that student demographics do not determine student performance and that all students regardless of their background should have their needs met in school. The DOE holds all schools accountable on these measures and believes that Samuel Gompers can do better for its students.
- In response to comment 22 which relates to how schools acquire resources to support students: All schools are funded 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/ELL/Title I status). If a school’s population declines from 2,500 to 2,100 students, for example, the school’s budget decreases proportionally—just as a school with an increase in students receives more money.

Principals have discretion over their budget and make choices about how to prioritize their resources, including deciding whether to purchase textbooks, etc.

- In response to comment 23 stating that the DOE should repurpose its funds to open a new school to Samuel Gompers: Indefinitely trying to improve a school that has struggled for years is not a gamble the DOE is willing to take, particularly here where the DOE has already allocated substantial resources to Samuel Gompers to help it improve. The DOE has had success across the City by replacing the lowest-performing schools with new schools that do better. The DOE owes it to families to give them the best possible options, and in some cases that means replacing low-performing schools with new ones. Considering the more positive student outcomes from the replacement of the lowest-performing

schools, it is more cost-effective to spend money on new schools than to continue to fund schools that are not able to turn around.

- In response to comment 24 regarding the firing of teachers: If the proposal to phase out Samuel Gompers is approved, all teachers, administrative, and non-pedagogical staff at Samuel Gompers 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. All excessing would be conducted in accordance with existing labor contracts. For example, the current United Federation of Teachers contract would require excessing to take place in reverse seniority order within each given teaching license area.
- In response to comment 26 regarding budget cuts and their impact on struggling schools like Samuel Gompers that have been proposed for phase-out: Budget cuts have not disproportionately impacted schools proposed for phase out. In school year 2010-2011, the DOE cut individual school budgets by an average of 4%, and worked hard to be fair to schools, so they would all bear an equitable burden. Schools that experienced larger reductions generally had smaller student populations this year compared to last year. As discussed earlier in this document, struggling schools like Samuel Gompers have received additional supports to help it succeed.
- In response to comment 27 concerning supports provided to schools that are phasing out: 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 and it is expected that schools that are approved for phase-out this year would also receive the same network support.

If the phase-out of Samuel Gompers is approved, the school 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.

The DOE recognizes that closing a school is a difficult experience for students, staff, and community members and will make every effort to facilitate this transition.

- In response to comment 29 concerning other Bronx schools with Cisco networking

programs: Samuel Gompers does offer Cisco networking programs. However, in addition to Samuel Gompers, both In-Tech Academy and Herbert H. Lehman High School offer Cisco networking programs.

- In response to comment 25 which cites statistics about student demographics and performance at Samuel Gompers: Based on the 2011-2012 Audited Register Samuel Gompers has: (1) 17% of students are English Language Learners; (2) 57% of this year's ninth graders are levels 1 and 2 in English Language Arts and mathematics; and (3) 22% of students receive special education services, including Self-Contained and Integrated Co-Teaching classes.
- Comment 30 asserts that not enough students are being prepared for college. The goal of New York City schools is to graduate all students on time and ready for college. However, some students graduate from high school and enter college unprepared to engage in college-level coursework. At CUNY, these students are required to take remedial courses. Students who are required to take remedial courses are less likely to persist and graduate from college.

The DOE does not dispute that more students, particularly minority students, need to be better prepared for college upon completing high school-- and the DOE believes that Samuel Gompers is not successfully doing so. The DOE believes that the schools being proposed to replace Samuel Gompers will achieve higher levels of college-preparedness for students.

- Comment 32 inquires about the New York City school phase-out policy, how a school is chosen to be phased out, and why Samuel Gompers was selected for phase-out. 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 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 2010-2011 Progress Report; and/or
- Received a rating of Underdeveloped on the most recent Quality Review; and/or
- Was identified as PLA by the State Education Department; and/or
- For high schools: Received a recommendation on their 2010-2011 Joint Intervention Team ("JIT") review for a significant change in organizational structure or phase-out/closure. (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.)
- For elementary and middle schools: Received a C or D recommendation on the 2010-2011 JIT review.

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

- High Schools that have a higher graduation rate than the city average. The city average for 2010-2011 is 65.1%; 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 receive differentiated support from their Children's First Network team, but are not in consideration for phase-out.

The most struggling schools 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
- School safety data.

In addition to understanding the data, the DOE also has 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 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 multistep 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.

As outlined in the EIS, Samuel Gompers has struggled for the past four years, and the school's performance during the 2010-2011 school year confirmed the DOE's assessment that the school lacks capacity to turn around quickly to better support student needs. Some of these factors that led to the decision to phase-out Samuel Gompers include:

- Graduation rates at Samuel Gompers have remained in the 41-51% range for the last four years.
- First-year credit accumulation is a key predictor of student success because students who fall behind early in high school often have trouble getting back on track to graduate. In 2010-2011, only 54% of first-year students at Samuel Gompers earned at least 10 credits. (The Progress Report defines students earning at least 10 credits as students who earn at least six of those 10 credits in three of the following four subject areas: Mathematics, English, Science, or Social Studies.) This rate of credit accumulation puts Samuel Gompers in the bottom 4% of high schools Citywide and in the bottom 9% of high schools with similar students.
- 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. Samuel Gompers earned an overall F grade on its 2010-2011 annual Progress Report, with F grades on Student Progress and School Environment, and a D grade on Student Performance. Samuel Gompers' Progress Report score was in the bottom 1% of high schools Citywide. Additionally, in 2010-2011, the school was designated by the State as PLA.
- Demand for Samuel Gompers has fallen steadily over the past few years. Between 2006-2007 and 2010-2011, student enrollment declined by approximately 700 students, or 46%. Samuel Gompers has four programs to which students apply as part of the High School Admissions Process: Information Technology, which received 2.1 applications per seat from students applying to ninth grade for September 2011; Pre-Engineering, which received 2.0 applications per seat; Desktop Publishing, which received 2.3 applications per seat; and Computer Aided Design, which received 1.1 applications per seat. All of these applications per seat are well below the Citywide average of 8.5 applications per seat across all school programs.
- The school's attendance remains below that of most other high schools. The 2010-2011 attendance rate at Samuel Gompers was 72%, which is well below the Citywide average of 86% for high schools. Samuel Gompers' attendance rate is in the bottom 2% of all high schools Citywide.

- Samuel Gompers was rated “Underdeveloped” on its most recent Quality Review in 2010-2011, indicating deficiencies in the way that the school is organized to support student learning. The reviewer cited a number of serious concerns, including: the need to develop assessments that are aligned to the curriculum, to implement a rigorous and engaging curriculum across subjects in alignment with the Common Core State Standards, and to implement a structured teacher evaluation system that provides actionable feedback and promotes pedagogical growth.
- Comment 36 states that the DOE has not fully explored the impact on availability of CTE programs in terms of capacity. The DOE plans for high school capacity on a borough-wide basis (based on the new ninth-grade seats, rather than ninth through twelfth grades) and has done a careful analysis—described in the EIS under “Impact on CTE Borough-wide Seat Capacity”—of how many seats would be lost due to the proposed phase-outs of Samuel Gompers, Jane Addams, and Grace Dodge. In this analysis, described in the amended proposals to phase out Samuel Gompers and Jane Addams, the DOE disclosed that the phase-outs of these schools would result in the loss of 709 new ninth-grade seats in schools with CTE programming, and that the new schools proposed would result in the potential addition of 493 new ninth-grade CTE seats. However, there is currently an excess of 796 seats in schools offering CTE programming, which means that the reduction of 216 seats still results in an excess of CTE seats in the Bronx.

The comment also addresses the impact of the phase-out on the availability of CTE programming for students in the school as it phases out and on the career pathways in Samuel Gompers and the proposed replacement school.

The DOE will work to support Samuel Gompers students enrolled in CTE programming as the school phases out. However, the DOE acknowledges that the school may have to reduce their offerings as the phase-out is implemented.

Regarding the difference between the pathways offered by the proposed new schools compared to the existing pathways at Samuel Gompers, the DOE has made efforts to propose new schools which would offer programming in career pathways in high growth industries, as described in the response to comments 2, 8, 9, 11, 15, and 18. Additionally, there will be significant excess space in the building as Samuel Gompers phases out, and the DOE is committed to opening additional new schools in the Bronx that will also offer a CTE pathway. Finally, the DOE notes that while the State approval process may take a significant amount of time, it is likely that new programs could obtain State approval well before the 2012-2013 cohort graduates four years later, enabling the inclusion of a CTE endorsement on their diplomas. Though programs may not be state approved, they may still be supporting students in achieving industry certifications, as is the case in programs at Samuel Gompers that are currently “in development.”

- Comments 37-40 are unrelated to the proposal and do not require a response.

Changes Made to this Proposal

- No changes have been made to this proposal.