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Chancellor

Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Phase-out of Jane Addams High School for Academic Careers (08X650) 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 an Educational Impact Statement ("EIS") describing a proposal to phase out Jane Addams High School for Academic Careers (08X650, "Jane Addams"), an existing high school in building X650 located at 900 Tinton Avenue, Bronx, NY 10456, within the geographical confines of Community School District 8 ("District 8"). It currently serves students in grades nine through twelve. The DOE proposed to phase out Jane Addams 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.

In two separate EISs originally posted on December 22, 2011, the DOE also proposed to open two new high schools in building X650 as replacements for Jane Addams: New Visions Charter High School for the Humanities II (84XTBD, "HUM II") and 08X559, a new district Career and Technical Education ("CTE") high school. However, on February 3, 2012, the DOE withdrew these co-location proposals and issued two new proposals providing for the co-locations of New Visions Charter High School for Advanced Math and Science II (84XTBD, "AMS II"), rather than HUM II, and 08X559 in building X650. The proposal to phase out Jane Addams was amended on February 3, 2012 to reflect this and other minor changes.

If this phase-out proposal is approved, Jane Addams will no longer admit new ninth-grade students after the conclusion of the 2011-2012 school year. The school will continue to phase out one grade level at a time, and current students will be supported as they progress towards graduation while remaining enrolled at Jane Addams. In cases where students do not complete graduation requirements by June 2015, the DOE will help students and families identify alternative programs or schools that meet students' needs so that they may continue their education after Jane Addams completes phasing out. Jane Addams is the only school currently located in building X650. In addition, X650 houses a Living for the Young Family through Education ("LYFE") program. There is also a Transportable Classroom Unit adjacent to Jane Addams that houses an Alternative Learning Center ("ALC"). Jane Addams is a

CTE high school that admits students in ninth grade through a screened selection method via the Citywide High School Admissions process.

If this proposal is approved, Jane Addams will begin phasing out one grade at a time starting in September 2012 and complete its phase-out after the 2014-2015 school year.

If the proposals to co-locate AMS II and 08X559 in building X650 are approved by the PEP on March 21, 2012, AMS II and 08X559 will begin to serve students in the building in September 2012. AMS II, a new public charter high school that was approved by the New York State Education Department ("SED") on September 12, 2011, would admit students through a charter lottery, giving preference to students who reside in District 8. 08X559 would admit students through the Citywide High School Admissions Process.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at the X650 school building on January 25, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 107 members of the public attended the hearing, and 30 people spoke.

Present at the meeting were: Deputy Chancellor Marc Sternberg; DOE Publications Director Melissa Harris; Jane Addams School Leadership Team ("SLT") President Anna Dominguez; Jane Addams Principal Sharon Smalls; Citywide Council on High Schools ("CCHS") Representative Robert Powell; Bronx Borough President Panel for Education Policy ("PEP") Appointee, Wilfredo Pagan; New York State Assemblyman Eric Steven's Representative, John Moncrefe; Family and Community Enagement Representative, Ariel Guerrero; and Paymon Rouhanifard, Amanda Cahn and Stephanie Crane from the Division of Portfolio Planning. Although Community Education Council ("CEC") 8 was consulted about the scheduling of the hearing and confirmed that at least one member would attend, no one from CEC 8 appeared at the hearing.

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

1. Anna Dominguez, Jane Addams' SLT President, commented that:
    a. She is concerned about the lack of parent involvement in the Jane Addams' school community.
    b. She approves of the current school policy regarding uniforms and cell phones.
    c. She is concerned about losing the CTE programming that is currently offered at Jane Addams.

2. Wilfredo Pagan, the Bronx Borough President's PEP appointee, stated that:
    a. He is concerned about the school leadership issues.
    b. He would like an update on the investigation of the leadership at the school.

3. A Representative from Assemblyman Eric Steven's office stated that:
    a. He would like updates on the investigation of the principal.
    b. He is concerned about the social and emotional impact that the phase-out will have on the students.
    c. He encourages all to visit the assemblyman's office and share their concerns.

4. 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 from it for reasons of poor academic achievement and are subsequently "warehoused" in other low performing schools that may someday be closed.
c. He further commented that phase-out schools are largely 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.

5. Sterling Roberson, the UFT Vice President for Career and Technical Education, stated that
    a. The DOE is shutting down this CTE school and several other CTE schools in the Bronx.
    b. He has serious concerns about the budget and funding for the school. He is also concerned about the resources that the school has.
    c. He is particularly concerned about the availability of health care CTE programming for students. He believes that this type of programming is essential for students right now.
    d. He believes it is important to respect the history of the school and maintain the integrity of its legacy.
    e. He is concerned about how students who have graduated and will graduate during the phase-out will be able to access their school records.

6. One commenter requested that Jane Addams be given more time to turn around and improve the school's quality before phasing it out.
7. Multiple commenters inquired about the process that the DOE uses to engage schools and communities prior to proposing a phase-out. These commenters also expressed concern that their voices and interests are not taken into consideration during this process.
8. Multiple commenters raised concerns about the school's leadership and many inquired about the status of the investigation of the school leader.
9. Commenters raised concern about the social and emotional impact of a phase-out on the students in the Jane Addams community.
10. Multiple commenters acknowledged the positive achievements and successes of the students and graduates of Jane Addams.
11. Several commenters voiced general opposition to the phase-out proposal.
12. Multiple commenters voiced support for the CTE programming currently offered at Jane Addams and expressed the need for this programming to continue. There was a particular interest in continuing the health care programming that Jane Addams offers. These commenters also expressed the importance that CTE programming plays in the professional, academic and emotional development of students. Additionally, many of these commenters challenged the DOE regarding the number of CTE schools that are being proposed for phase-out in the Bronx.
13. Multiple commenters voiced support for the LYFE program in the X650 building and acknowledged its importance to the students and the community.

14. Multiple commenters discussed the special education community at Jane Addams and asked about the support that will be available for special education students during and after the phase-out.
15. Multiple commenters raised concern about the supports that will be in place for students during the phase-out. Some students expressed concern about their ability to graduate and where they would be able to attend school if the proposal is approved.
16. One commenter inquired about how the phase-out would impact the drug prevention program currently offered at Jane Addams.
17. One commenter asked how teachers would be impacted as a result of this phase-out proposal.
18. Two commenters voiced the need for the school to offer strong academic programming in addition to the CTE programming.
19. Multiple commenters challenged the DOE's strategy of phasing-out and replacing low-performing school generally, and challenge the DOE's determination that Jane Addams, specifically, is a school in need of phase-out and replacement.
20. Multiple commenters voiced their support for the teachers, staff and community at Jane Addams.
21. Multiple commenters inquired about the support currently offered to Jane Addams students and the support that would be provided to students during and after the proposed phase-out.
22. Two commenters raised concerns about the budget, funding and resources that are allocated to Jane Addams. One commenter expressed interest in giving Jane Addams extra resources instead of providing the proposed new schools with resources to open in the X650 building.
23. Multiple commenters expressed the historical importance of Jane Addams and acknowledged the many students who have been served by both the school and the childcare program in the building.
24. One commenter voiced general support for the proposal to phase out Jane Addams.
25. Multiple commenters raised concerns about the impact that this phase-out will have on the surrounding community and expressed concern about the availability of high school options for future students and families in the community.
26. One commenter noted the importance of Jane Addams' internship program and acknowledged the success that Jane Addams students have at these internships.
27. Several commenters asked questions about the district and charter schools proposed to replace Jane Addams during and after the phase-out.
28. One commenter asked if the new schools in the building would offer college-credit courses for students.
29. Multiple commenters asked about the CTE programming and certification at the proposed new schools.
30. Multiple commenters asked about the supports that had been provided to the Jane Addams community in the past.

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

31. How does closing a school address student and community needs?
32. What will happen to the students at Jane Addams?
33. Several questions were submitted about school leadership and the ongoing investigation.
34. Will the proposed new schools offer college credits?
35. How were the CTE career pathways selected for the new schools? Will the school receive state certification?

36. Charter schools are smaller so why are they right for this school? What is the lottery? Where do students go who are not selected to attend the new charter school?

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

37. A comment was submitted on February 8, 2012 expressing concern for CTE programming with a particular concern for the cosmetology programming that is currently offered at Jane Addams.
38. A comment submitted on February 8, 2012 also expressed that the concerns regarding staff and parent involvement that were voiced at the joint public hearing were not significant and the school could still improve without being phased out.
39. A comment submitted on February 8, 2012 noted typographical errors that were found in the original EIS.
40. A comment submitted to the DOE's website inquired as to the date and time of the Joint Public Hearing.
41. Class Size Matters ("CSM"), submitted written comments objecting to the phase-out of CTE programming in the Bronx. CSM's comments can be summarized as follows: 1) The DOE did not adequately disclose the overall impact on total CTE seats available in the Bronx; 2) the replacement schools will not fully replace the different types of CTE programs currently offered in the Bronx; 3) the new CTE programming that the DOE will offer in the Bronx is incompatible with student demand; 4) the new CTE programs are unlikely to receive state approval promptly; and 5) 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 are not related to the proposal

1. Several commenters raised concerns about a group of students who were recently excluded from the Regents exams and inquired why that happened. Questions about this were also submitted during the question and answer period.
2. One commenter stated her opposition to the current mayoral administration and general DOE policies.
3. One commenter expressed anger at the media's portrayal of both the school and the school leader.

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

Comment 1(a) and 38
concern the level of parent involvement in the Jane Addams' school community.

The DOE encourages all schools to engage with parents. The DOE is proposing to open two small schools on this campus because we believe that the smaller school communities offered by the proposed replacement schools will be able to more effectively engage parents and the community at large.

Comments 1(b), 10, 20 and 38
note positive student achiemement that has taken place at Jane Addams, express general support for students, teachers and staff, and praise certain school programs and policies.

The DOE acknowledges and commends the students and staff of Jane Addams for their hard work, dedication, and passion for the school. While the DOE notes that some Jane Addams students have

achieved various positive outcomes, as noted above, Jane Addams has been identified as among those schools having the most trouble serving all of their students. As noted in the EIS and the response to comment 19, the comprehensive review conducted by the DOE concluded that Jane Addams does not have the capacity to improve its performance quickly enough to best serve all students. 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 all students and the community.

Comments 1(c), 5(a,c), 12 and 37

voice support for the current CTE programming available at Jane Addams and the need to continue CTE programming for current and future students. There is particular concern about the continued availability of cosmetology, nursing and healthcare CTE programming and the number of CTE schools proposed for phase-out in the Bronx.

The DOE believes strongly in the importance of CTE programming throughout New York City and within the Bronx. However, struggling schools should not be kept open simply because they provide CTE options. The DOE is making yearly efforts to maintain and increase CTE options while evaluating all schools' performance. To this end, there are currently 23 schools in the Bronx that are CTE schools or offer CTE programming. The DOE has opened ten new CTE schools in the past three years, and two of those schools are located in the Bronx. The DOE is currently proposing to open four schools in the Bronx that offer CTE programming – two of these schools are proposed to replace Jane Addams as it phases out. The proposals to open these schools demonstrate that the DOE believes in continuing to provide an array of CTE programming.

In response to the concerns about the cosmetology programming, Jane Addams' cosmetology program will continue to exist, subject to student interest and demand, as the school phases out. Students in the cosmetology program will continue to be supported as they approach graduation. The school's cosmetology program is currently "in development," which means that the program has not yet received official approval by the State to endorse CTE diplomas in this area. Students in these programs receive instruction in CTE content, but cannot receive CTE-endorsed diplomas unless the programs are approved by the time they graduate. However, regardless of program approval status, schools with the capacity to teach toward and prepare students for an industry-certified exam can continue to do so throughout the course of the proposed phase-out.

If this proposal is approved, the cosmetology program will not continue to be offered at the Jane Addams campus after the school phases out. The DOE is creating new CTE programs in emerging fields such as health sciences, information technology, and business administration based on labor trends, student demand for those programs, and interest from industry partners in hiring CTE ready graduates.

Students will still have the opportunity to enroll in other high schools that offer cosmetology programs such as W.H. Maxwell Career and Technical Education High School in Brooklyn and School for Cooperative Technical Education in Manhattan.

In response to community concern and need for the healthcare programming in the Bronx and in the X650 building, the DOE withdrew the original proposal to replace Jane Addams with New Visions Charter School for the Humanities II (84XTBD, "HUM II") and issued new proposals to site this school at the Samuel Gompers campus. Instead, the DOE has proposed to site New Visions Charter School for Advanced Math and Science II (84XTBD, "AMS II") in the Addams campus to better meet the community need for healthcare and science related CTE programming. AMS II will offer a rigorous, college-preparatory program with CTE programming designed to equip students with the skills necessary to achieve success in college and careers. AMS II is planning to offer CTE programming in the following two career clusters: Health Sciences; and Science, Research, and Engineering. The DOE will continue to incorporate community feedback and work with New Visions Charter School organization to further develop and provide this health and science-related

programming. The EIS detailing the The Proposed Co-Location of a New Public Charter High School, New Visions Charter High School for Advanced Math and Science II (84XTBD), with Existing School Jane Addams High School for Academic Careers (08X650) and New High School 08X559 in School Building X650, Beginning in 2012-2013 can be accessed here:
http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Mar212012Proposals.htm

Comments 2(a,b), 3(a), 8 and 33
raise concerns about the school's leadership and inquire about the ongoing investigation of the principal.

The principal of Jane Addams resigned on January 26, 2012. The DOE cannot discuss the allegations regarding the class credit issues at the school until the investigation is complete.

The former principal, like all principals, was evaluated and hired through the DOE's standard C-30 process in the terms articulated in the DOE's collective bargaining agreement with the Council of Supervisors and Adminstrators.

An interim acting principal has been appointed to lead Jane Addams and the DOE is confindent that he will provide positive leadership for the school during the school's phase-out.

Comments 3(b) and 9
pertain to the social and emotional impact of a potential phase-out on the students.

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, Jane Addams 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. The DOE, 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.

Comments 4(a,b,d)
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.

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. 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.

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 of them all 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 farther behind.

Our new schools are overwhelmingly getting the job done for students, but when they are not, we follow the same process to phase out and replace that school as we would any other school.

<u>Comments 3(c) and 11</u>
voice general opposition to the phase-out proposal and encourage community members to meet with their elected officials to express their concerns.

We understand the crucial role that schools play in the lives of New York City's students and their families. Public schools are central to the history and identity of communities across the city, which is why deciding to phase out a school is the toughest decision we make. However, we believe that this proposal represents the right course of action for the students of New York City.

<u>Comment 4(c)</u>
states concern that the DOE targets specific communities and schools with a high percentage of students of color for phase-out.

The DOE does not deliberately target for closure schools with high percentages of students of color. A detailed description of the process by which the DOE arrives at a phase-out proposal is provided in the response to comment 19.

<u>Comments 5(b) and 22</u>
concern the school's budget and the funding and resources allocated to the school.

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. Even if the DOE had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls. 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 and the DOE does not believe that providing more funding to Jane Addams would assist the school in improving to provide the best educational option for New York City students.

Comments 5(d), 23 and 25
note the historical significance of the Jane Addams school and the many students who have attended both the school and have been served by the childcare program available in the building.

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. This is one of the many reasons why the decision to propose a school's phase-out is the most difficult decision the DOE makes. The DOE expects that the replacement schools will be fully engaged with the community and responsive to the community's needs, serving a vital role as an anchor for the Jane Addams community. Additionally, the campus will retain the Jane Addams name to ensure the continuation of the historical significance of the building.

Comment 5(e)
concerns access to the academic records for current and previous Jane Addams students.

If the proposal is approved, Jane Addams' academic records will maintained by the new district CTE high school in school building X650. Students and parents will have access to these records in accordance with Chancellor's Regulation A-820.

Comments 6 and 38
request that the DOE give Jane Addams more time to turn around and improve in quality before phasing it out

For the majority of schools we investigate for interventions, we see hope that the school can turn around, 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.

As described in the EIS and the response to comment 19 above, the quantitative and qualitative indicators show that Jane Addams does not have the capacity to significantly improve. If these outcomes persist, Jane Addams students will fall farther behind their peers in other schools. The DOE has offered specific supports to help the school's efforts to improve the school's performance, as detailed in the EIS and response to comment 30, but even with support the school has not produced adequate outcomes for the students. Therefore, the DOE concluded that the phase-out of Jane Addams is warranted because the school lacks the proper infrastructure to meet the needs of its students and families.

Comment 7
pertains to the engagement processes that the DOE conducts before deciding to propose a phase-out and expresses concern about how the community and student voices are taken into consideration

Consistent with our approach last year and our desire to incorporate school and community input in our decision-making process, in October and November we 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 we shared information about school performance and discussed the community's 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 we may take to improve it. We gathered feedback – to understand what's working, what's 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.

We 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 our feedback meetings and are posted on our website.

Again, all of this happened prior to a decision about whether a school will be proposed for phase-out or middle school truncation.

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

In January, Joint Public Hearings were held for all proposals and public feedback was collected at these meetings and through dedicated email and phone numbers from the date the proposal was issued until 24 hours prior to the February 9, 2012 PEP meeting. The Department's analysis of public comment is contained in this document which will be available to the PEP prior to its vote on the proposal.

<u>Comment 13</u>
Voices support for the LYFE program located in the school building X650 and the importance it has had in helping parenting students

The LYFE program supports pregnant and parenting students enrolled in a DOE school by providing childcare and referral services. Social Workers assigned to each of the LYFE centers provide social and emotional support for young parents to facilitate their academic progress as well as their progress as parents. The LYFE program is managed by the central LYFE program under the purview of the DOE's District 79 and operates independently of Jane Addams in X650. The LYFE program serves students in those schools, but may also serve students in other schools in the surrounding community as well. All LYFE staff are supervised by the program's director and assistant principals. The LYFE program leaders are the rating officers for the field staff.

The DOE anticipates that the LYFE program will not be impacted by this proposal. The LYFE program is not expected to lose any space or reduce the services offered as a result of this proposal. The LYFE program will continue to operate in the X650 building as Jane Addams phases out. Once the phase-out of Jane Addams is complete, the LYFE program is expected to remain in the X650 building and will continue to provide these services as long as there is a need and demand for the program.

Comment 14
pertains to the special education students in the school and within the larger DOE system and inquires about the support available for special education students and the support that will be provided to students currently at the school during and after the course of its phase-out.

Jane Addams currently offers Integrated Co-Teaching ("ICT") classes, Self Contained ("SC") classes and Special Education Teacher Support Services ("SETSS"). Jane Addams currently offers English as a Second Language ("ESL") services; it does not offer a transitional bilingual or dual-language program. Students with disabilities will continue to receive mandated services in accordance with their Individualized Education Plans ("IEP"). English Language Learners ("ELLs") at Jane Addams will continue to receive mandated services as the school phases out. The proposed district and public charter schools will meet student need and continue to provide all services in accordance with the students' IEPs. For further details regarding the supports provided to current students during the phase-out, please refrence the below response to comments 15, 21 and 31.

Comments 15, 21, 31 and 32
inquire about support currently offered to students, the support that will be offered to students during and after the proposed phase-out of Jane Addams, and how current students will progress to graduation.

Under this proposal, all current Jane Addams students will have the opportunity to graduate from Jane Addams, assuming that they continue to earn credits on schedule.

Students who are in the ninth grade for the first time can participate in the High School Admissions Process and can apply to attend a different high school for tenth grade. Current ninth grade students at Jane Addams who are interested in attending a different school for tenth grade may have already taken part in this process. If this proposal is approved in March 2012, there would be another opportunity for current ninth grade students at Jane Addams, and students at other schools who have applied to Jane Addams, to participate in the High School Admissions Process.

Students who are interested in applying to attend a different school as a tenth grader in September 2012 should meet with their guidance counselor. In early March, students may submit a Round Two High School Choice Form. Students may receive a match as part of the Second Round of the admissions process.
Current repeat ninth grade students would complete high school at Jane Addams, if they earn credits on schedule. As the school becomes smaller, students who do not earn credits on schedule would receive more individualized attention to ensure they receive the support they need to succeed. Students would also be encouraged to meet with their guidance counselor to review progress toward graduation and consider applying to a Transfer High School.

Current tenth-, eleventh-, and twelfth-grade students who are on track to graduate will complete high school at Jane Addams, provided they continue to earn credits on schedule. As the school becomes smaller, students will receive more individualized attention through graduation to ensure they are receiving the support they need to succeed. Students will also be encouraged to meet with their guidance counselor to discuss all of their options. Current tenth-, eleventh-, and twelfth-grade students who are not on track to graduate should meet with their guidance counselor to discuss their options. Depending on their age, academic profile, and credit accumulation, some students may be better served in one of the DOE's Transfer High Schools or Young Adult Borough Centers, which have strong track records for helping over-age, under-credited students get back on track toward graduation. In general, however, it is expected that most current Jane Addams students will remain enrolled at the school as they work toward graduation.

Jane Addams currently offers Integrated Co-Teaching ("ICT") classes, Self Contained ("SC") classes and Special Education Teacher Support Services ("SETSS"). Jane Addams currently offers English as a Second Language ("ESL") services. Students with disabilities will continue to receive mandated services in accordance with their Individualized Education Plans ("IEP"). English Language Learners ("ELLs") at Jane Addams will continue to receive mandated services as the school phases out.

The DOE will arrange a new placement for students who haven't accumulated sufficient credits and those who have not passed the minimum number of Regents exams to graduate by June 2015.

With respect to academics, Jane Addams will continue offering all necessary classes to support current students as they work to meet graduation requirements and earn their high school diplomas. As total enrollment at the school declines throughout the course of the phase-out, the school will likely need to scale back its elective course offerings. It is difficult to predict how those changes might be implemented, as decisions would rest with school administrators and would be based on student demand as well as staff and budget conditions at the school. As appropriate, the DOE will work with Jane Addams to ensure that students continue to have opportunities to pursue elective academic coursework through collaborative offerings with other schools in the building, online coursework, or in partnership with higher education institutions in the City.

The DOE remains focused on helping Jane Addams students succeed. If this proposal is approved, Jane Addams would be provided targeted, customized, and intensive supports aimed at the unique needs of the school and its students. This support would be 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; and
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

Jane Addams will continue offering student athletics and other extracurricular programs options, but the number and range of programs offered may gradually diminish due to declining student enrollment as the school phases out.

<u>Comment 16</u>
Pertains to the drug prevention program offered at Jane Addams and its importance in helping to support students

The DOE will assist Jane Addams and the proposed replacement schools in meeting all students' academic, developmental and socio-emotional needs including those needs related to substance abuse issues. Among the supports offered by the DOE's Office of School Support are the following:

- Training for 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.
- Supporting the school to develop strategies to monitor and improve attendance.

<u>Comment 17</u>

pertains to the impact that the proposal to phase out Jane Addams will have on teachers. All teachers, administrative, and non-pedagogical staff at Jane Addams would be excessed over the course of the phase-out.[1] 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 (UFT) contract would require excessing to take place in reverse seniority order within each given teaching license area.

Barring system-wide layoffs, excessed teachers would be eligible to apply for other City positions, and any teachers who did not find a permanent position would be placed in the Absent Teacher Reserve pool, meaning that they would continue to earn their salary while serving in the capacity of a substitute teacher in other City schools. Should there be a vacancy in the school in a teacher's license area within one year of the teacher being excessed, the teacher would have a right of return to the school, consistent with applicable contractual provisions regarding teachers' seniority.

It is also important to understand that the students who would otherwise have enrolled in Jane Addams will now be enrolled in the new schools phasing in on the campus and other new schools opening borough-wide, and those schools might need to hire additional staff. New staff positions would also be created due to the phase-in of new or replacement schools Citywide. Consequently, this proposal would not necessarily result in an overall loss of teaching positions within the Citywide system.

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

Comment 18
voices the need to provide strong academic programming in addition to strong CTE programming.

The DOE aims to provide strong academic programming across all schools in order to provide high quality educational options for students throughout New York City. The phase-out of Jane Addams is intended to allow for new educational options in the Bronx community that will provide both strong core curriculum and CTE programming.

Comment 19
inquires about the New York City school phase-out policy, how a school is chosen to be phased out, and why Jane Addams 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

[1] Excessing of staff occurs when a school requires fewer positions than the number of staff currently in the license area or job title.

- For high schools: Received a recommendation on their 2010-11 Joint Intervention Team ("JIT") review for significant change in organizational structure phase-out/closure
    - For elementary and middle schools: Received a recommendation for significant change in organizational structure 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 schools struggling the most 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 understanding 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 constituents about what is working and what isn't before making a decision about the supports or interventions that can best support student outcomes.

As was described in the EIS, Jane Addams 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. As noted in the EIS,

- Graduation rates at Jane Addams have remained below 53% for the last four years. Last year, Jane Addams' four-year graduation rate (including August graduates) was 45% in 2011—well below the Citywide average of 65.1% and in the bottom 4% of high schools Citywide for graduation rate. (Citywide average is based on the 2010 New York State reported graduation results for NYCDOE students.)

- If Regents diplomas alone counted toward graduation—as will be the case next school year—the four-year graduation rate at Jane Addams would drop to just 38%, putting Jane Addams High School for Academic Careers in the bottom 13% of high schools Citywide.

- First year credit accumulation is a key predictor of student success because students who fall behind early on in high school often have trouble getting back on track to graduate. In 2010-2011, only 57% of first-year students at Jane Addams earned at least 10 credits. This rate of credit accumulation puts Jane Addams in the bottom 6% of high schools Citywide. (The Progress Report defines students earning at least 10 credits as students who earn at least 6 of those 10 credits in 3 of the following 4 subject areas: Math, English, Science, and/or Social Studies.)

If these outcomes persist, Jane Addams 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 school's performance, as detailed in the EIS, but even with support the school has not produced adequate outcomes for the students. Therefore, the DOE concluded that the phase-out of Jane Addams is warranted because Jane Addams lacks the proper infrastructure to meet the needs of its students and families.

Comment 25
raises concern about the impact that this phase-out will have on the availability of high school options for students in the community if the phase-out proposal is approved.

The DOE plans for high school capacity on a borough-wide basis and students in the community will continue to have high school options after the phase of Jane Addams. The DOE measures changes in high school seat capacity based on new ninth-grade seats. The chart below details each of the current proposed changes and provides a summary of the overall impact on ninth-grade seat capacity in the Bronx.

Proposed Changes to Bronx High Schools

DBN	School Name	Building ID	PEP Vote	Impact on 9th Grade Seat Capacity[2]	Admissions Method for Seats Added/Removed	Offers CTE Programming
Proposed High School Phase-Outs for 2012-2013						
07X655	Samuel Gompers Career and Technical Education High School	X655	Pending February Vote	-107	Educational Option and Screened	Yes
08X295	Gateway School for Environmental Research and Technology	X450	Pending February Vote	-92	Limited Unscreened	
08X650	Jane Addams High School for Academic Careers	X650	Pending February Vote	-133	Screened	Yes
10X660	Grade Dodge Career and Technical Education High School	X660	Pending February Vote	-219	Educational Option and Screened	Yes
Enrollment Reduction at Schools for 2012-2013						
08X405	Herbert H. Lehman High School	X405	N/A	-250	Zoned and Educational Option	Yes

[2] Seat Capacity of existing schools is based on total new ninth-grade admits in 2011-2012 (which includes both students who entered through the High School Admissions Process and through OTC placements). This figure may differ from previously posted EISs because it is based on the Audited Register, which was released subsequent to earlier proposals. Seat capacity of new schools is based on the phase-in plans for proposed new schools, as described in the EISs for each proposal. These proposals can be found on the DOE's Web site at: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/default.htm.

Proposed New High Schools for 2012-2013[3]						
84XTBD	New Visions Charter High School for Advanced Math and Science II	X650	Pending March Vote	+125	Lottery, preference to District 8	Yes
08X561	New High School	X450	Pending February Vote	+108	Limited Unscreened, priority to the Bronx	
84XTBD	New Visions Charter High School for the Humanities II	X655	Pending March Vote	+125	Lottery, preference to District 7	Yes
08X559	New CTE High School	X650	Pending March Vote	+135	Limited Unscreened, priority to the Bronx	Yes
10X565	New CTE High School	X660	Pending February Vote	+108	Limited Unscreened, priority to the Bronx	Yes
84XTBD	ROADS Charter High School II	X401	Pending March Vote	+150	Lottery, preference to District 12[4]	
08X558	New High School	X405	Pending March Vote	+108	Limited Unscreened	
09X564	New High School for ELL students	X410	Pending March Vote	+81	Screened for ELL students	

Approved Grade Expansion for 2012-2013						
09X327	Comprehensive Model School Project M.S. 327	X240[5]	Approved by January 2012 Vote	+128	Limited Unscreened, priority to continuing 8th graders (MS Choice: Unscreened)	
Total Proposed Change in 9th Grade Seat Capacity for 2012-2013				**+267**		
Approved Grade Expansion for 2013-2014						
07X223	M.S. 223 The Laboratory School of Finance and Technology	X149	Approved by December 2011 Vote[6]	+160	Limited Unscreened, priority to continuing 8th graders (MS Choice: Unscreened)	
Total Proposed Change in 9th Grade Seat Capacity for 2013-2014				**+427**		

The proposed new schools and approved grade expansions would add 1,068 available ninth-grade seats in new high schools and expanded middle schools in 2012-2013. The phase-outs of Samuel Gompers Career and Technical Education High School, Gateway School for Environmental Research and Technology, Jane Addams High School for Academic Careers, and Grace Dodge Career and Technical Education High School would result in the loss of 551 ninth-grade seats, and the reduction of enrollment at Herbert H. Lehman High School will result in the loss of 250 ninth-grade seats. Therefore, the DOE anticipates a net gain of 267 new ninth grade-seats in the Bronx.

[3] New schools listed exclude transfer schools, which serve students who have already attended DOE schools for at least a year and therefore do not represent new ninth-grade admits.

[4] The selection criteria for ROADS Charter High School II includes a provision that prioritizes students who are more than two years behind in coursework. However, these seats have been counted as new ninth-grade seats because this is one of five different priority provisions in the lottery criteria, and in itself does not exclude new ninth graders.

[5] Building X240 is a new construction that is scheduled to open for the 2012-2013 school year. As part of the proposal to expand M.S. 327, which was approved by the PEP on January 18, 2012, the DOE has also proposed to re-site the school out of its current location and into this new building where it would have enough space to expand to serve high school grades.

[6] The DOE proposed to expand M.S. 223 to serve high school grades, and this proposal was approved by the PEP on December 14, 2011. However, for reasons detailed in the EIS for that proposal, available on the DOE's Web site at http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Dec2011Proposals.htm, the implementation of M.S. 223's grade expansion will be delayed a year and will only add new ninth-grade seats beginning in the 2013-2014 school year.

For the 2011-2012 school year, there was a total of 15,403 ninth-grade seats available in the Bronx. A total of 14,959 new ninth-grade students are enrolled in Bronx high schools in 2011-2012, leaving 444 excess seats. Thus, if all of these proposals are approved, there would be 267 new seats, and a total of 15,670 total ninth-grade seats in the Bronx for the 2012-2013 school year. Current ninth-grade seat capacity is based on 2011 ninth-grade seat targets for all district high schools (excludes District 75 and District 79 programs that offer CTE); seat targets for schools that have a zoned admissions element are set to the number of ninth-grade new admits. However, it should be noted that not all students in the proposed new schools offering CTE programming are expected to be enrolled in such programs.

In addition to what is reflected in the chart, and as noted throughout this EIS, the DOE has also proposed to open a new transfer high school to serve over-age, under-credited students in building X655. This new school would add approximately 130-170 seats in 2012-2013 and 230-270 seats by 2014-2015. These seats are not included above, as they are not available to first-time ninth graders.

Comment 24
voices general support for the phase-out proposal and do not require a response.

Comment 26
pertains to the internship opportunities offered to Jane Addams students and acknowledge the success Addams students have had at their internships.

The DOE commends the efforts of Jane Addams' staff and students to secure internships for students as a means of enhancing the CTE curriculum taught at Jane Addams. As Jane Addams phases out and the new schools phase in, the DOE will work with the district CTE high school and the New Visions Charter organization to assist in continuing these internship opportunities and/or developing new internships that can assist in furthering the CTE curriculum at each new school.

Among the supports that are and will continue to be offereered by the Office of School Support are the following:

- Training for 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.
- Supporting the school to develop strategies to monitor and improve attendance.
- Advising and supporting leadership in the process to gain approval for CTE programs.
- Providing opportunities and training for 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

Comments 27, 28, 29, 34, 35 and 36
pertain to the new schools proposed to replace Jane Addams in the 2012 – 2013 school year.

The proposals for these schools were withdrawn and new proposals were posted on February 3, 2012. These proposals can be accessed here: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Mar212012Proposals.htm. The new proposals will be voted on at PEP Meeting on March 21st, and these comments will be addressed in the analyses of public comment for those proposals, to be posted on March 20, 2012

Comment 30

inquires about the supports previously given to Jane Addams

All schools receive support and assistance from their superintendent and Children's First Network, 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. We do everything we can to provide struggling schools with leadership, operational, instructional, and student supports that can help turn a struggling school around.

Struggling schools like Jane Addams have a targeted action plan developed by their network. These plans 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; and
- Staff and/or leadership changes.

To aid the school's efforts to improve performance, the DOE offered numerous supports including:

Leadership Support:

- Extensive leadership training and mentoring for the principal, assistant principals and department leaders to help them review school data and 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.
- Supporting leadership and staff in deepening the instructional vision around lesson planning, grading policies, observation, and family engagement.
- Supporting and training leadership in systems and strategies for increasing graduation and monitoring credit accumulation.

Instructional Support:

- Supporting and training teachers in instructional improvement strategies for addressing the various needs and learning styles of students with disabilities.
- Supporting the School Improvement Team in facilitating training for teachers in assessment design, curriculum mapping, and student feedback as tools aimed at meeting necessary standards and expected student outcomes.
- Professional development opportunities for teachers on shared grading policies, differentiated instruction and questioning tactics aimed at increasing student interest and raising student performance.
- Training for staff on successful ways to improve student outcomes through data analysis and various tools to understand student progress.

Operational Support:

- Advising school staff on budgeting, human resources, teacher recruitment and building management.
- Support for school staff on developing strategies and practices for improving student scheduling and

creating programs for students that targets their needs.
- Extensive training on crisis management and strategies for creating a safe and positive learning environment.

Student Support:

- Training for 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.
- Supporting the school to develop strategies to monitor and improve attendance.

CTE-Specific Support:

- Advising and supporting leadership in the process to gain approval for CTE programs.
- Providing opportunities and training for 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

Jane Addams 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 failed to meet the needs of its students and families.

Comment 39
addresses typographical errors found in the EIS that was originally posted on December 22, 2011.

The amended EIS corrected the typographical error referenced and can be accessed here:
http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals

Comment 40
inquired about the date and time of the joint public hearing for Jane Addams

The joint public hearing for the proposed phase-out of Jane Addams was held on January 25th at 6:00 p.m. in the X650 school building at 900 Tinton Avenue, Bronx, NY 10456.

Comment 41
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 addresses the impact on the career pathways in Jane Addams and the proposed replacement school.

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 2012 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 and Administration
- Hospitality and Tourism

In response to these findings, and community concern regarding the availability of health career programs at Jane Addams, the DOE withdrew the proposal to co-locate the New Visions Charter High School for Humanities II and has instead proposed to site New Visions Charter High School for Advanced Math and Science II in the Jane Addams building. This school would offer CTE programming in the Health Careers pathway. 08X559 would offer CTE programming in the Hospitality and Tourism pathway.

Changes Made to the Proposal

No changes have been made to this proposal.