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Chancellor

Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Phase-Out of Grace Dodge Career and Technical Education High School (10X660), Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to phase out Grace Dodge Career and Technical Education High School (10X660, “Grace Dodge”), an existing high school located in building X660, located at 2427 Crotona Avenue, Bronx, NY 10458, within the geographical confines of Community School District 10 (“District 10”). It currently serves students in grades nine through twelve. The DOE is proposing to phase out Grace Dodge 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.

If this proposal is approved by the Panel for Educational Policy (“PEP”), Grace Dodge 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 until it closes after the 2014-2015 school year. Current students will be supported as they progress towards graduation while remaining enrolled at Grace Dodge. 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 Grace Dodge completes phasing out.

Grace Dodge is co-located with Crotona International High School (10X524, “Crotona International”), a new high school that opened with ninth grade in September 2011. It will serve grades nine through twelve at full-scale. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, libraries, and cafeterias. Crotona International is still phasing in, gradually growing to full-scale as it adds a new grade of students annually. During the 2014-2015 school year, Crotona International will serve its first cohort of students in twelfth grade. In addition, X660 houses a Young Adult Borough Center (10X667, “Grace Dodge YABC”).

Both Grace Dodge and Crotona International offer Career and Technical Education (“CTE”) programs. Both also admit students in ninth grade through the Citywide High School Admissions process and are screened schools.

If this proposal is approved by the PEP, Grace Dodge will begin phasing out one grade at a time beginning in September 2012 and complete its phase-out in the 2014-2015 school year. In another Educational Impact Statement (“EIS”), the DOE is proposing to open a new high school, 10X565, in building X660 in September 2012. This school will continue growing to full-scale as Grace Dodge phases out. The new school will open with ninth grade, adding one grade annually and reaching full-scale in the 2015-2016 school year with a grade span of nine through twelve. Crotona International will also continue to phase in as planned.

Summary of Comments Received at the Joint Public Hearing

A Joint Public Hearing regarding this proposal was held at school building X660 on February 3, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 151 members of the public attended the hearing, and 41 people spoke. Also present at the meeting were: John Tornifolio, Principal at Grace Dodge; Grace Dodge School Leadership Team (“SLT”) representatives Brenton Anderson, David A. Davis, Liana Maris, Israel Soto, and Denise Sullivan; Marvin Shelton, President of Community Education Council (“CEC”) 10; Noah Kaufman from the Citywide Council on High Schools (“CCHS”); Wilfredo Pagan, Bronx appointed representative to the PEP; Sterling Roberson, United Federation of Teachers Vice-President for CTE High Schools; Cheryl Simmons-Oliver representing Senator José Serrano’s Office; Carron Staple, Bronx High School Superintendent; and Deputy Chancellor Marc Sternberg.

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

1. Grace Dodge SLT representative Denise Sullivan spoke in support of the proposal. She stated that the Chancellor’s decision to phase out the school is the right one because the school has received failing grades for three consecutive years on the Progress Report. She also stated that students are lagging behind in college when they are forced to take remedial courses and that this is due to poor preparation in high school.
2. Grace Dodge SLT representative Brenton Anderson spoke against the proposal and stated that at the beginning of the current school year Grace Dodge began to downsize its enrollment under the Transformation model. He stated that the school has not completed this process and that it should be given the three years it was promised to implement these changes. He also stated that a new principal was put in place and yet he has not been given adequate time to improve the school.
3. Marvin Shelton, President of CEC 10, spoke against the proposal and stated that the downsizing of Grace Dodge has not taken its course. He urged the PEP to delay the phase-out decision for a year in order to give the school the time it needs to produce better results.
4. Noah Kaufman, representing the CCHS, spoke against the proposal. He stated that the education leadership at Tweed and at the network and cluster levels have not supported the students at Grace Dodge. He further stated that the PEP, whose members are appointed by the Mayor, has never voted against a phase-out proposal. He referenced the

Mayoral Task Force on CTE Innovation report from 2008 and the Mayor's commitment to CTE programs across the City and stated that the phase-out of Grace Dodge, a CTE high school, contradicts those goals.

5. Wilfredo Pagan, the Bronx appointee to the PEP, stated that there are only three schools in the Bronx that provide CTE programs and that it is wrong to take away this opportunity from students who are not college-bound and wish to enter the workforce instead. He further stated that he wants to work with the DOE to support and strengthen the CTE programs that already exist.
6. Sterling Roberson, United Federation of Teachers Vice-President for CTE High Schools, spoke against the proposal. He stated that although Mayor Bloomberg has publicly expressed a commitment to open 12 new CTE high schools across the City, he is closing 8 existing CTE schools this year, and opening new ones with fewer programs. There is a great need for CTE programs in the Bronx in emerging fields such as information technology and health care, particularly in the Hunts Point area, and these programs are not being represented in those being created at new schools. Furthermore, the DOE has not provided any data about how it intends to support each of the schools that are being proposed for closure or how it will create new internship opportunities for students enrolled in those schools. He believes in CTE schools and the opportunities they can provide, especially in poor communities, for economic advancement. He encouraged people to attend the February 9, 2012 PEP meeting and to sign up to speak against the proposal.
7. Cheryl Simmons-Oliver, a representative from Senator José Serrano's Office, expressed concern about the lack of resources provided to Grace Dodge. She also stated that teachers and families have not been given the opportunity to fully participate in the process.
8. A commenter spoke against the proposal and stated that a lot of the schools that have opened during the current administration have also failed and are being closed. The commenter also stated that the current administration should take more responsibility for failing schools.
9. Multiple commenters spoke of the great importance of CTE programs in poor communities and how those programs open doors for students. They also stated that CTE programs motivate students to stay in school and seek more training and that closing CTE programs across the Bronx is destroying the source of entry-level employment for poor communities.
10. Multiple Grace Dodge teachers and staff spoke about the positive relationships and the caring community that exists at the school. They also praised the many students and teachers who work hard every day.
11. Multiple commenters stated that Grace Dodge has not been given enough support from the DOE.
12. A commenter stated that during his eight years of teaching at Grace Dodge, he has not had textbooks for his students. He asked if it was DOE policy not to give textbooks for students to take home to work on their homework. He also said that attendance is a big problem at the school and that the DOE should engage parents more and should encourage them to get their children to come to school.
13. A Grace Dodge teacher said that during his first year of teaching at the school, his students carefully planned a field trip to Red Lobster, which involved raising funds,

among other things. He stated that his students excelled at this project and that no test or the Common Core can measure these skills.

14. Multiple Grace Dodge students spoke about their positive experience with the Virtual Enterprise program. They spoke about the opportunity they had to attend a career fair in California as well as winning first place in Michelle Obama's "Let's Move" campaign. They attributed these positive experiences to the Virtual Enterprise program.
15. A Grace Dodge student stated that the nursing program gave her the opportunity to intern at various organizations and because of it she has gained valuable skills that will allow her to work in order to pay for college. She also stated that Grace Dodge has some of the best teachers and that she has felt supported by them. She thinks that it is a mistake to close the school and that by closing the school future students will no longer have these opportunities.
16. Multiple students stated that the school has helped them tremendously and that its cosmetology program should not close. They spoke about how the school has been a source of motivation and inspiration for them and that there are many successful graduates of the school.
17. Multiple commenters spoke of the hardships and challenges Grace Dodge students face. There is a high pregnancy rate among students and many of them are or have been homeless. The school also has a high concentration of English Language Learners ("ELLs") and special education students. The school is also located in one of the most struggling communities, where 23% of Latino families have less than a high school diploma and are less likely to have quality health care. The DOE cannot solve the problem of failing schools alone because it is one that is rooted in poverty.
18. A commenter opposed the phase-out of the school and instead proposed the following plan: (1) to hire a new principal; (2) to have students evaluate their teachers; (3) to offer professional development for teachers and staff; (4) to hire teachers and staff who are culturally competent and who can connect with students; and (5) to create a college readiness program.
19. A Grace Dodge student in the EMT program expressed concern about his ability to graduate with a CTE diploma if the school is phased out.
20. Multiple commenters stated that many students at schools that are phasing out drop out and that closure is not the solution.
21. Multiple commenters stated that the school should be given the time it was promised under the Transformation model to improve before a closure decision is made.
22. A student spoke about how Good Shepherd, a community-based organization at the Grace Dodge campus, has supported him through after-school programs and how he was able to meet his art credits through a drama class offered by the organization.
23. A Grace Dodge teacher stated that students arrive three years or more behind in reading and that it is hard for any teacher to make up for that.
24. A student read a poem about her positive experience at the school.
25. A former Grace Dodge teacher stated that the CTE teachers at the school should not be excessed. These teachers should be retained in order for students to complete the necessary coursework to get a CTE endorsed diploma. The commenter also expressed the opinion that the morale of teachers and students is low as a result of the phase-out decision.

26. A teacher read a letter on behalf of a former student who is now attending college. The student said that Grace Dodge gave her the opportunity to take finance courses while in school and she is now an accounting major in college. The student, who was on the Dean's List at New Paltz University during her first semester, urged the DOE to keep the school open.
27. A teacher spoke about a former student with an Individualized Education Program ("IEP") who is a successful business owner today. The teacher went on to say that students with disabilities benefit from educational programs that are hands-on, such as CTE programs.
28. A teacher who teaches in the EMT program spoke about the many successes of her students. Students in the program have gone straight into jobs after graduation. Last year, all seven students in the EMT program passed the State exam for EMT. One student in particular is now assisting in the EMT program at Hostos Community College and another student got a job with the Fire Department. Although her students passed the State exam they were not able to get certified by the City because certification required a driver's license, something her students could not afford to get. She has petitioned Bronx elected officials for funds to help her students get driver's licenses but unfortunately she has been turned away. Her desire is for her kids to continue to have the opportunity to enroll in EMT classes and to land jobs after graduation.
29. A teacher spoke of her desire to strengthen the cosmetology program by connecting students with businesses in the industry. However, since the school is slated for closure, the program will not continue. She further stated that there are only two programs in cosmetology in the Bronx and that the closure of Grace Dodge would take away those opportunities for students who are dedicated and interested in the field. Additionally, CTE can provide real opportunities for students who have been victims of social promotion.
30. A commenter said that CTE teachers are hired at a higher salary and asked what the DOE's plan is for hiring CTE teachers at new schools.
31. A commenter asked what would happen to students at Grace Dodge as it phases out.
32. A commenter asked if there have been schools proposed for phase-out that had been given a second chance to stay open.
33. A commenter asked why the school does not have any reading specialists given the fact that students come in with low levels of reading proficiency.
34. A commenter asked why the DOE makes decisions to close schools that create opportunities for students.
35. A commenter asked why the DOE is proposing to phase out the school given that the school began to implement the Transformation model in September.

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

The DOE received one written comment via e-mail.

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. A commenter provided information about an after-school program that tutors students in the most commonly used words in college textbooks. The commenter encouraged students and parents to pick up pamphlets at the end of the meeting.

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

- Comment 1 is in favor of the proposal and does not require a response.
- In response to comments 2, 3, 21, and 35 concerning the implementation of the Transformation model at Grace Dodge, past strategies to improve student outcomes, and the DOE's decision to propose the school for phase-out: The DOE initiated and completed a comprehensive review of Grace Dodge during the fall of 2010, after Grace Dodge earned a D on its 2009-2010 Progress Report and had been named as a Persistently Lowest Achieving ("PLA") school by the State for the first time in January 2010. Upon completion of that review, the DOE decided to reduce the enrollment of Grace Dodge for September 2011 and to reduce the number of CTE pathways that the school would offer, beginning in September 2012.

In May of 2011, the DOE submitted applications for School Improvement Grants ("SIG") to the New York State Education Department ("SED") for most of its PLA schools, including Grace Dodge. Grace Dodge was approved for \$1,250,000 in SIG funding to support the Transformation model in 2011-2012. This model's interventions aim to change the school by augmenting instructional and student support services and by creating new teacher incentive and teacher evaluation systems to build and retain quality staff.

However, recent performance at Grace Dodge, as demonstrated in the school's most recent Progress Report released at the end of October 2011, suggested the need to further investigate Grace Dodge to determine if Transformation was still the best model for the school and whether the new, narrowed focus on fewer academic programs and a smaller number of students would be enough to enable the school to turn around quickly, or if a more significant intervention might be required to increase student performance. For example, the school's Overall Progress Report grade was consistent between 2008-2009 and 2009-2010 at a D, but declined to an F in 2010-2011. Similarly, the school's graduation rate was consistent between 2008-2009 and 2009-2010 at 46% (including August graduates), but declined by 11 percentage points to a graduation rate of 35% in 2010-2011.

The stabilization of these significant measures from 2008-2010 suggested the possibility that supports like those in the Transformation model could increase student achievement, especially when combined with the narrowed focus of fewer academic programs and reduced enrollment. However, the dramatic decline in these metrics during the 2010-2011 school year suggests that the core supports in the Transformation model will not have a quick enough impact to meaningfully improve student outcomes. As a result, after this year's investigation, the DOE no longer believes that the Transformation model would be an adequate intervention to assist Grace Dodge to improve quickly enough to support current students to graduate and to support new students to progress to graduation.

Additionally, the Turnaround model required the implementation of a teacher evaluation system at Grace Dodge. Paired with the other supports and interventions that are part of the Transformation models, a teacher evaluation system would have enabled schools to improve student achievement through a more robust and rigorous teacher evaluation process, which in turn would have resulted in more targeted support for struggling teachers and would have allowed for expedited removal of ineffective teachers.

Unfortunately, the DOE has been unable to reach an agreement with the United Federation of Teachers on integral elements of this new teacher evaluation system. Because of this, the SED informed the DOE that all New York City PLA schools in either the Transformation or Restart models will no longer receive SIG funding to continue the school changes supported by these models. Therefore, even if this proposal is not approved, Grace Dodge would no longer receive funding to support the Transformation model.

The DOE believes that only the most serious intervention—the gradual phase-out and eventual closure of Grace Dodge—will address the school's longstanding and declining performance struggles and allow for new school options to develop in building X660, like Crotona International, which opened in September 2011.

- In response to comments 4, 7, and 11 concerning the lack of support offered to Grace Dodge: Grace Dodge 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. Some of the supports offered to Grace Dodge include:

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 for leadership on implementing plans in support of Citywide instructional initiative.

- Supporting leadership and staff in generating meaningful strategies for improving the quality of classroom visitations, instructional feedback and teacher reflections, as a way to raise teacher practice and improve student outcomes.

Instructional Support:

- Supporting and training teachers in instructional improvement strategies related to science resources and the development of a rigorous and comprehensive science program.
- Supporting teachers in assessment design, curriculum mapping, and student feedback as tools aimed at meeting the necessary standards and expected student outcomes.
- Providing 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 increase 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.
- Supporting school staff on developing strategies and practices for improving student attendance and creating strategies for targeting attendance concerns.

Student Support:

- Training the School Based Support Team in comprehensive guidance programs and evidence based counseling strategies targeted at developing and improving the capacity for social and emotional supports at the school level.
- Developing comprehensive mentoring programs in order to strengthen academic and social supports for targeted students.
- Developing health education programming and resources aimed at strengthening healthy decision-making.
- Supporting the Network in developing and maintaining relationships with community based organizations, including Committee for Hispanic Children and Families, Good Shepherd and Health Advance Institute.

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

- In response to the portion of comment 4 concerning the composition of the PEP and whether they make impartial decisions: The composition of the PEP is determined by State Education Law Section 2590-b, not by the DOE. The PEP consists of 13 appointed members and the Chancellor. Each borough president appoints one member and the mayor appoints the remaining eight.

The PEP members extensively deliberate on proposals and therefore the votes are not always unanimous. However, after deliberation, the PEP has approved every phase out proposal put before it, with the exception of phase-out proposals that have been withdrawn.

- In response to comments 4, 5, 6, 9, and 29 concerning the Mayor's initiative to create high-quality CTE programs across the City as well as available CTE options in the Bronx: 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 Grace Dodge. 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.

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 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

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 English Language Learners, 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 comment 6.

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 Grace Dodge have failed to do so for several years in a row.

Finally, there will still be space in the Grace Dodge campus after Grace Dodge phases out, if approved, and after both Crotona International and 10X565 phase in, if approved. The DOE plans to create another educational option for students in this community assuming space becomes available in the building.

- In response to comments 7 and 34 concerning the DOE's decision-making process and engagement meetings held with the school community regarding potential interventions to help struggling schools: 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 from 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 early engagement meetings at these schools, the DOE has conversations with constituents about what is working and what is not before making a decision about the supports or interventions that can best support student outcomes.

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

At the end of this multi-step process, our analysis and engagement directs us to a set of schools that quantitative and qualitative indicators show do not have the capacity to significantly improve. Deciding which course of action can best support the students and community of a struggling school is not easy, but the DOE is compelled to act based on 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 most difficult decision the DOE makes. But it is the right thing to do for the students of New York City.

Furthermore, the public review process includes a Joint Public Hearing at which the DOE collects comments about the proposal. The DOE also sets up a dedicated e-mail, Web site, and phone line to provide yet other opportunities for the public to submit their comments. All of these comments are then summarized and analyzed in this document which is made available to the PEP prior to their vote on the proposal.

- Comment 8 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 seven schools and

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

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

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

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

- In response to comments 10, 13, 14, 15, 16, 22, 24, 26, 27, and 28 concerning the achievement of students and faculty at Grace Dodge: The DOE commends and acknowledges the students and staff of Grace Dodge for their hard work and for creating a positive learning environment at the school. The DOE’s decision to phase out the school is not based on any single reason. The DOE has conducted a thorough evaluation of the school and has determined that the best course of action is to phase out the school and allow for new school options to develop that will better serve the community.

In addition, the DOE acknowledges the efforts and hard work of students and faculty in the EMT, Nursing, and Virtual Enterprise programs. The DOE is committed to work with the school to support those programs and students enrolled in those programs will continue to be supported as the school phases out, if the proposal is approved.

- In response to comments 12 and 33 regarding the use of textbooks and the allocation of funds and resources at the school: It is not DOE policy to deny students access to textbooks at home to work on their homework. These decisions rest with the school administrators themselves.

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 or hire specialists.

- In response to the portion of [comment 12](#) concerning low attendance rates at Grace Dodge: Grace Dodge has struggled for years with low attendance rates. Last year, for example, the school’s attendance rate was 77% compared to the Citywide high school average of 86%. The DOE has offered support to Grace Dodge in this area and will continue to do so if the proposal is approved.
- In response to [comments 16 and 29](#) related to the cosmetology program: Grace Dodge currently offers a CTE program in cosmetology and the school will continue to offer this program, subject to student interest and demand, as it phases out. 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. In general, students in CTE programs that are “in development” receive instruction in CTE content, but cannot receive CTE-endorsed diplomas unless the programs are approved by the time they graduate.

However, the cosmetology program will not continue to be offered in the Grace Dodge campus after the school phases out, if the proposal is approved. 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.

The DOE notes that Grace Dodge and Jane Addams are the only schools in the Bronx that currently offer CTE programs in cosmetology. However, students who are interested in cosmetology 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, School for Cooperative Technical Education in Manhattan, Queens Vocational and Technical High School in Queens, and Ralph R. McKee Career and Technical Education High School in Staten Island.

- In response to [comments 17 and 23](#) regarding the impact of external factors on student achievement as well as students’ proficiency levels at the time of entry: The Progress report uses a peer index to compare schools serving similar students in terms of demographics. Each high school has up to 40 peer schools. The peer index for Grace Dodge 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 over-age at the time of entry into the ninth grade. Based on these factors, other schools in Grace Dodge’s peer schools have

achieved far better results with similar students. For example, Discovery High School, a Bronx school in Grace Dodge's peer schools, has a 62% graduation rate and received an A on its most recent Progress Report in 2010-2011. The DOE holds all schools accountable on these measures and believes that Grace Dodge can do better for its students.

- In response to the portion of comment 17 regarding pregnant students at Grace Dodge: There are currently multiple programs in the Grace Dodge campus that support pregnant and parenting students. These include:
 - Boyz II Men which counsels young men on responsibilities of adulthood including parenting responsibilities.
 - SHERIL (Strong Healthy Empowered Respectful Intelligent Leaders) which counsels young women on responsibilities of adulthood including parenting responsibilities.
 - Committee for Hispanic Children and Families which provides pregnancy prevention and parenting programs.
 - CATCH which provides screening for sexual health issues, pregnancy, and counseling.

In addition, the school's clinic has two certified social workers who support students who are pregnant or have young children. The DOE will continue to support these students as the school phases out and these organizations will continue to provide services to students.

- In response to comment 18 which proposes a new plan for Grace Dodge: The proposal to phase out Grace Dodge will be considered at the February 9, 2012 PEP meeting. As discussed earlier, the DOE has tried other strategies to improve student outcomes at Grace Dodge. Unfortunately, the school's performance has continued to decline and the DOE now believes that phase-out is the most appropriate intervention to improve student outcomes in this community and allow for new educational options that will better serve students.
- In response to comment 19, which relates to students enrolled in the EMT program: The EMT program at Grace Dodge is not a CTE program. In other words, the EMT program does not lead to a CTE-endorsed diploma.

As mentioned in the EIS, with respect to academics, Grace Dodge 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 Grace Dodge 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.

- In response to comments 20 and 31 related to student outcomes at schools that are in the process of phasing out and supports provided to those schools: 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 the DOE has learned what differentiated support is needed to support these schools and students.

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

While the DOE does not know exactly what supports would look like for the 19 proposed phase outs and 6 proposed truncations being proposed, the DOE does not that we will continue to establish differentiated and deliberate support to those schools and students.

If the phase-out of Grace Dodge 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.

These supports should help to continue a positive trend we see in phasing out schools: As high schools phase out, the four-year graduation rate rises as the dropout rate falls.

- In response to comment 22 regarding the partnerships at Grace Dodge: The DOE commends the work of Good Shepherd with Grace Dodge students. The DOE notes that the partnerships and programs offered by Grace Dodge would continue to exist during the school's phase-out, though the specific programs 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 like Good Shepherd to provide programming for its students.
- In response to comments 25 and 30 relating to teacher hiring: All teachers, administrative and non-pedagogical staff at Grace Dodge 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.

New district schools follow the hiring process consistent with the procedures set forth in the collective bargaining agreement between the DOE and United Federation of Teachers. New district schools that have an impact on a school that is closing or phasing out shall be 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.

- In response to [comment 32](#) related to prior decisions to withdraw phase-out proposals: The DOE has withdrawn phase-out proposals in the past based on community feedback received, as was the case last year with the proposed phase-out of P.S. 114 Ryder Elementary in Brooklyn and the proposed phase-out of Alfred E. Smith Career and Technical Education in the Bronx the year prior.

When the DOE proposes schools for phase-out, 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 early engagement meetings at these schools, staff members from the DOE 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. Sometimes these discussions may result in decisions to withdraw or revise a proposal.

- [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.

As mentioned in the EIS, Crotona International is a new high school that just opened in September 2011. Crotona International will offer a CTE program in the Information Technology Pathway.

The comment also suggests the proposed new school and Crotona International will not adequately replace the seats in Grace Dodge. Firstly, as mentioned in the EIS, the DOE anticipates that as Grace Dodge phases out, Crotona International phases in, and the proposed new school phases in, there would still be significant underutilized space in the building. The DOE is committed to opening additional new schools in the Bronx that will

also offer CTE pathways, which would recover additional seats lost due to the phase-out of Grace Dodge.

Secondly, as mentioned in the EIS, the DOE plans for high school capacity on a borough-wide basis, and therefore has assessed the impact of the phase-out of Grace Dodge and the phase-ins of Crotona International and other new schools in this context. As a result, while the number of new ninth-grade seats available in the building for the 2012-2013 school year may be less than what was available in recent years, there will be sufficient capacity in the borough to serve Bronx high school students in general and sufficient CTE capacity in the borough to serve Bronx high school students interested in CTE pathways for the 2012-2013 school year. In future years, once the DOE has proposed the additional new school anticipated for the 2013-2014 school year, the seats at Grace Dodge would be more than replaced by the new schools in the building.

- Comment 37 is unrelated to the proposal and does not require a response.

Changes Made to this Proposal

- No changes have been made to this proposal.