



Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Closure of Academy of Business and Community Development (13K336) at the End of the 2011-2012 School Year

Date of Panel Vote: February 9, 2012

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to close Academy of Business and Community Development (13K336, “ABCD”), an existing school serving students in grades six through twelve in building K258 (“K258”), located at 141 Macon Street, Brooklyn, NY 11216, in Community School District 13, because of its low performance and its inability to turn around quickly to better support student needs. ABCD is a single-gender school, serving only male students, which admits students through the borough-wide Middle School Choice Process and the Citywide High School Admissions Process. If this proposal is approved, ABCD will close at the conclusion of the 2011-2012 school year. Current sixth and seventh grade students, and current eighth grade students who do not meet promotional standards at the end of the school year, will be offered seats at other District 13 middle schools or at middle school in their resident districts. Current eighth grade students who meet promotional standards at the end of the school year, and all first time ninth grade students, will be supported through the Citywide High School Admissions Process to select a new high school. Current tenth and eleventh grade students, and current ninth and twelfth grade students who do not meet promotional standards at the end of the school year, will be offered seats at other Citywide high schools. Current twelfth grade students who meet promotional standards at the end of the school year will graduate in June 2011.

ABCD is currently co-located in building K258 with a public charter school and an Alternative Learning Center (“ALC”). A “co-location” means that two or more school organizations are located in the same building and may share large, common spaces like the auditoriums, gymnasiums and cafeterias. The public charter school permanently housed in K258 is Leadership Preparatory Bedford Stuyvesant Charter School (84K517, “Leadership Prep Bed Stuy”), which currently serves students in kindergarten through sixth grade, and is phasing-in to eventually serve students in kindergarten through eighth grade in 2013-2014. Leadership Prep Bed Stuy is operated by a charter management organization (“CMO”) called Uncommon Schools (“Uncommon”). Uncommon currently manages a total of eleven charter schools in New York City, all of which are located in Brooklyn. The ALC housed in K258 (88K983) is a suspension center serving students in sixth through eighth grade. The DOE does not anticipate that the

proposed closure of ABCD will impact the instructional programming, admissions processes, extracurricular programming, or community partnerships at either Leadership Prep Bed Stuy or the ALC.

In a separate Educational Impact Statement (“EIS”) posted in February 2012, the DOE is proposing to re-site P140K@KAPPA V (75K140, “P140K@KAPPA V”), an existing District 75 school serving students in kindergarten through eighth grade who have an Individualized Education Program (“IEP”) classification of emotionally disturbed. P140K@KAPPA V is currently housed in Building K275 (“K275”), located at 985 Rockaway Avenue, Brooklyn, NY 11212 in Community School District 23. Beginning in the 2012-2013 school year, the DOE is proposing to re-site P140K@KAPPA V to K258. A “re-siting” means a school will be located in a different building than the building it is located in currently.

There is sufficient capacity in middle schools and high schools throughout the district, borough, and City, to provide middle and high school students currently attending ABCD with seats at other schools for 2012-2013. Additionally, many public charter schools located in District 13 and across Brooklyn give preference to students in the respective geographic districts, in which they are located, providing another option for students to enroll in middle and high school through the charter lottery application process. If this proposal is approved, the Office of Student Enrollment will inform parents of current sixth, seventh, ninth, tenth, and eleventh grade students about middle and high school transfer options in Spring 2012.

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

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

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at K258 on January 31, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 92 members of the public attended the hearing and 27 people spoke. Present at the meeting were: Brooklyn High School Superintendent, Karen Watts; Chancellor’s Designee, Deputy Chancellor Dorita Gibson; Community Education Council (“CEC”) 13 Representative, David Goldsmith; Leadership Prep Bed Stuy School Leadership Team (“SLT”) Representative, Daniel Gennaoui; ABCD SLT Representative, Sharice Nelson; and ABCD Principal, Simone McIntosh.

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

1. CEC Representative David Goldsmith expressed his opposition to the proposal on the grounds that:
 - a. The school has not been given adequate resources to succeed.
 - b. The assessment of the school based on performance data is suspect.
 - c. Principal McIntosh has not been given sufficient time to turn around the school.
2. ABCD SLT Representative Sharice Nelson expressed her opposition to the proposed closure stating:

- a. The Mayor's Black and Latino male initiative makes evident the importance of an all boy's educational option like ABCD, which is designed to support the at risk black and Latino male youth population.
 - b. ABCD has switched networks five times over the course of the past few years. How is a school supposed to succeed when Network supports are in such flux?
 - c. Due to budgeting and lack of experience, the high school was opened with only \$300,000 dollars. This led to a decline in the middle school's performance.
 - d. The supports that are outlined in the EIS that the DOE says it offered are generic and inaccurate. She has not seen a single instance of professional development since her time at the school, which began in 2006.
 - e. Since 2007, there has not been staff on the budget to support literacy and math growth. Similarly, due to a lack of resources, the school does not have use of innovative programs like Read 180, Wilson, or Achieve 3000. How is the school supposed to succeed without these programs and resources?
 - f. A PD Center was never opened on-site because ABCD did not have the money to run the PD Center.
 - g. The special education population at ABCD is higher than the District average, yet there are not adequate resources to provide services to the special education population due to budget constraints. The EIS inaccurately states that ABCD offers self-contained ("SC") special education classes, which ABCD has not been able to offer since 2010 due to funding constraints.
 - h. The data inaccurately represents the number of students on track to graduate.
 - i. ABCD currently has a girl on its register even though it is an all boys school.
 - j. Currently and in the past, the DOE has sent students to ABCD with poor attendance records. For example, there are eight students on register who have never shown up to school. How can you count this data against ABCD for poor attendance?
 - k. During early engagement meetings, ABCD was told that only the middle school was being reviewed for intervention. Yet now DOE is proposing to close the whole school - grades six through twelve.
 - l. ABCD only offers one sport, basketball, which indicates a lack of resources.
 - m. Why not support ABCD and provide adequate resources to the school in an effort to help turn the school around? Students are upstanding members of the local community, who devote much of their time to various community service projects.
 - n. The Building Utilization Plan for the proposed co-location of 75K140 with Leadership Prep Bed Stuy proposes a shared schedule in which the District 75 program has use of the library. However, ABCD does not currently have a library to use.
3. City Councilmember Albert Vann expressed his opposition to the proposal stating:
 - a. The DOE should support the students at ABCD and help turn the school around.
 - b. The DOE rarely changes its mind and decides to rescind proposals of this nature.
 4. One commenter stated that:
 - a. New replacement schools do not receive Progress Report scores for at least four years.
 - b. The DOE claims that new schools opened under Mayor Bloomberg are better than those that have been replaced, yet in the latest round of closings, eleven of the schools proposed for phase-out were opened during the mayor's administration.

- c. Students are turned away from newly opened schools based on poor academic achievement.
5. Multiple commenters expressed upset that ABCD students were never told that the high school was being considered for closure. During early engagement, only the potential phase-out of the middle school grades was discussed.
6. Multiple commenters expressed concern about the difficult transition that many students will face when uprooted from their current school and forced to attend an entirely new school, some for only one year before graduating.
7. Multiple commenters concern about where students will attend school next year should the proposed closure be approved.
8. Multiple commenters expressed their support for ABCD and the social, emotional, and academic supports that are provided at the school by the staff and the school community, stating that ABCD serves as a family and second home to the young men of the Bedford-Stuyvesant community.
9. Multiple commenters expressed concerns over safety should students need to transition to a new school. They stated that ABCD provides a safe haven for current students.
10. Multiple commenters spoke of a lack of equity in the resources that have been provided to ABCD and its students compared to other schools, including a lack of working computers, limited athletic and extracurricular offerings and after school activities, a lack of a literacy coach since 2007-2008, minimal PD opportunities for teachers, and a lack of a library.
11. Two commenters contended that, due to previous co-locations, ABCD was stripped of its library.
12. Multiple commenters spoke of the necessity for an all boy's educational option like ABCD, which creates young leaders out of the black and Latino men who are disproportionately incarcerated, without jobs, and victims of gang violence and drug abuse. To that end, why would the DOE close a school that is aligned with the Mayor's initiative to help serve the at-risk black and Latino male community?
13. Multiple commenters stated that ABCD has not been given adequate time or supports to turn around and expressed their beliefs that with more time the current Principal can improve the school.
14. Multiple commenters expressed that instead of closing down the school, the DOE should commit the resources to help improve student performance and turn the school around.
15. Multiple stated that the DOE has already made up its mind about the proposed closure of ABCD.
16. Multiple commenters expressed support for a single sex educational option like ABCD.

Summary of Issues Raised During Question and Answer Period:

17. Why does the DOE want to close schools?
18. Where will my child attend school if ABCD is closed at the end of the year?
19. How will students meet with a guidance counselor when ABCD does not have one?

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

20. One written comment expressed support for the proposed closure of ABCD.

21. One written commenter expressed opposition to the proposed closure of ABCD on the grounds that the commenter's child is excelling at the school.
22. The DOE received multiple written comments expressing support for the school. These comments expressed opposition to the school's proposed closure on the grounds that the majority of students are on track to graduate. Closing the high school would be unfair.
23. The DOE received an oral comment from a concerned parent who wanted further information on the proposal to site 75K140 in K258, and expressed concern that a new school in the building would be detrimental to existing Leadership Prep Bed Stuy students.
24. The DOE received a written comment contending that there are only forty-seven working computers for 230 students, which exemplifies a lack of support for the school.
25. The DOE received multiple written comments concerning the proposed re-siting of 75K140 to K258. These commenters stated that the DOE is giving money to a District 75 program instead of investing it in ABCD.
26. The DOE received multiple written comments concerning Mayor Bloomberg's Black and Latino men initiative which stated that ABCD should remain open and supported in an effort to help this population succeed.
27. Class Size Matters ("CSM"), submitted written comments objecting to all of the proposed phase-outs and truncations proposed by the DOE. In opposing the DOE's proposal to phase-out and eventually close these schools, the CSM comments cited the following reasons: (1) none of the Educational Impact Statements for the proposals include discussion of how the proposed phase-outs or, where applicable, the co-locations would affect class size; (2) the Citywide Instructional Footprint does not include class size standards; (3) the Educational Impact Statements use utilization figures from the DOE's Blue Book, which does not take into account the need to reduce class sizes in schools Citywide; (4) the community members, faculty, and families of schools that have been proposed for phase-out have opposed the proposed phase-outs and truncations; (5) the schools that have been proposed for phase-out and/or truncation have high concentrations of "at-risk" students, as defined as English Language Learner students, students with disabilities, and economically disadvantaged students.

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

- Comments 4(a-c), 20, 23, and 25 are either in support of the proposal or do not relate to this proposal and therefore do not require a response.

Nevertheless, in regards to comments 23 and 25, as stated above, the DOE published an EIS in February 2012 proposing the re-siting and co-location of P140K@KAPPA V in K258. This proposal will be voted on at the March 26, 2012 Panel for Educational Policy meeting. This proposed re-siting is not related proposed closure of ABCD or ABCD's budget allocation.

- Comments 1(b), 2(h-j) 8, 10, 17, 21, 22 relate to the process by which the DOE decides to phase out or close a school and why the DOE decided to close ABCD.

The DOE annually reviews the performance of all schools Citywide. This process identifies schools that are having the most trouble serving their students.

First the DOE compiles a preliminary list of schools that meet one or more of the following criteria:

- received a grade of D, F, or a third consecutive C or worse on the most recent Progress Report; and/or
- received a rating of Underdeveloped on the most recent Quality Review; and/or
- was identified as Persistently Lowest Achieving (“PLA”) by the New York State Education Department (“SED”); and/or
- received a recommendation on its most recent Joint Intervention Team (“JIT”)¹ review for significant change in organizational structure or phase out/closure.

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

- high schools that have a higher graduation rate than the Citywide average. The Citywide average for 2010-2011 was 65.1%; and/or
- elementary and middle schools that have a higher English Language Arts and Math average proficiency than their district average or the Citywide average (whichever is lower). The Citywide average for 2010-2011 is 50.6% proficient; and/or
- schools that received an overall grade of A or B on the 2010-2011 Progress Report; and/or
- schools that earned a “Well Developed” score on the most recent Quality Review; and/or
- schools receiving a Progress Report for the first time in 2010-2011.

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

The remaining schools, which represent the schools that are struggling the most, are further investigated for more serious interventions that may include phase-out/truncation and replacement or closure. The DOE considers a few key data points:

- student performance trends over time;
- demand/enrollment trends over time;
- interventions already underway;
- talent data;
- school culture/environment;
- district needs/priorities; and

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

- school safety data.

In addition to understanding the data, the DOE also works with school staff, parents, students, communities, and networks to get a holistic sense of what is happening at the school and what supports or interventions would most likely improve student outcomes. In early engagement meetings at these schools, the DOE hears from constituents about what is working and what is not before making a decision about the supports or interventions that can best support student outcomes.

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

At the end of this multistep process, the DOE's analysis and engagement directed it to a set of schools that quantitative and qualitative indicators show do not have the capacity to significantly improve. Deciding what course of action can best support the students and community of a struggling school is not easy, but the DOE is compelled to act based on its commitment to ensuring that every student has access to high-quality school.

No single factor determines whether a school will be proposed for phase-out or closure. Deciding to phase out or close a school is the toughest decision the DOE makes. But, in some cases, it is the right thing to do for the students of New York City.

In this specific case, after a thorough review process, the DOE determined that ABCD was not delivering a high quality educational option for all of its students. For its middle school grades, ABCD earned an overall D grade on its 2010-2011 Progress Report. On the 2009-2010 Progress Report, ABCD's middle school earned an overall D grade. While ABCD's middle school did receive an overall B on its 2008-2009 Progress Report, it should be noted that 97% of elementary/middle schools Citywide received an A or B on the 2008-09 Progress Report. ABCD's 2008-2009 Progress Report overall score was still in the bottom 10% Citywide.

While ABCD's high school has yet to receive an overall Progress Report grade, since this is the first year the school has served twelfth grade students, current high school students are struggling with their performance on the Regents exams. For the 2010-2011 school year, ABCD ranked in the bottom 1% of all high schools Citywide in terms of student performance on the Regents exams in Math. Additionally, ABCD fell in the bottom 5% of all high schools Citywide in terms of student performance on the Regents exams in Science.

The majority of ABCD's middle school students remain below grade level in English and Math. In 2010-2011, only 19% of students were performing on grade level in English,

putting the school in the bottom third of middle schools Citywide in terms of English proficiency. Only 26% of students were performing on grade level in Math, putting the school in the bottom 13% of middle schools Citywide in terms of Math proficiency.

Further, low middle school student performance at ABCD has been a persistent trend. In 2008-2009, 48% of ABCD's middle school students were performing on grade level in English, putting the school in the bottom 19% of middle schools Citywide in terms of English proficiency. Only 59% of ABCD's middle school students were performing on grade level in Math, putting the school in the bottom 15% of middle schools in Citywide in terms of Math proficiency. In 2009-2010, only 20% of students were performing on grade level in English, placing the school in the bottom 28% of middle schools Citywide in terms of English proficiency, and only 25% of students were on grade level in Math, placing ABCD in the bottom 20% of middle schools in Citywide in terms of Math proficiency.

In 2010-2011, ABCD was not adequately helping middle school students to make progress as demonstrated by the fact that ABCD was in the bottom 5% of middle schools Citywide in terms of learning growth in Math and the bottom 27% in terms of learning growth in English. Learning growth measures annual student growth on State English Language Arts and Math tests relative to similar students. Thus, if these results persist, ABCD students will fall further behind their peers in other schools.

ABCD continues to be in very low demand, another indicator that the school is not meeting the needs of the local community. District 13 middle schools admit students through the Middle School Choice process. During the 2010-2011 school year, out of 1,114 total applicants, only 323 students, or 29%, who applied to ABCD ranked it as one of their top three choices and only 60 students, or 5%, ranked ABCD as their first choice. Additionally, enrollment in the incoming sixth grade classes at ABCD has steadily declined. In the 2006-2007 school year, ABCD served 70 sixth grade students. In 2011-2012 there were only 45 sixth grade students enrolled at the school, representing a 36% decrease in the sixth grade enrollment over the years.

Demand at the high school level followed the same pattern as the middle school; students were not electing to attend ABCD for grades nine through twelve. There is a very low demand for high school seats at ABCD. Although this marks the first year that ABCD serves all four grades of high school, there are currently 39 students currently enrolled in ninth grade and only 16 students enrolled in twelfth grade.

Additionally, ABCD has an 80% attrition rate for students transitioning from middle to high school. Of the 44 students who were enrolled in eighth grade during the 2010-2011 school year, only 9 students, or approximately 20%, chose to remain at ABCD for ninth grade in 2011-2012. This indicates that the school is not providing a continuous educational option for students across grades six through twelve. In 2010-2011, only 115 students applied to ABCD for 75 seats in this year's ninth grade class. This means that ABCD had a ratio of 1.5 applicants per seat, whereas the citywide average was 8.5 applicants per seat. Additionally, only 18 students, or 16%, ranked ABCD as their first

choice high school.

All of these concerns suggest that the school is ill-equipped to turn around quickly to better support students. The DOE believes that only the most serious intervention—the closure of ABCD—will best serve students and the community. The DOE remains committed to providing quality middle school and high school options to District 13 families. The DOE has taken this definitive course of action to ensure that students in this community do not fall further behind their peers.

- Comments 1(a, c), 2(b, d, g), 2(m), 3(a), 13, 14, and 24 concern supports and resources provided to ABCD.

All schools receive support and assistance from their respective superintendents and Children First Networks. The Children First Network is a team that delivers operational and instructional support directly to schools. Struggling schools receive supports as part of system-wide efforts to strengthen all schools; and they also receive individualized supports to address their particular challenges. The DOE strives to provide struggling schools with leadership, operational, instructional, and student supports that can help turn a struggling school around.

Struggling schools will have a targeted action plan developed by their Children First 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. Thus, while some of the supports listed in the EISs may seem “generic,” contrary to the comment, the supports cited in each respective EIS is specific to the school that is the subject of that particular EIS.

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

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 of leadership on implementing of plans in support of Citywide instructional initiatives.

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

Instructional Support:

- Supporting and training teachers in classroom engagement strategies as a way to deepen instructional expectations, student interest, and classroom rigor.
- Supporting the school in assessment design, curriculum mapping, and student feedback as tools aimed at meeting the necessary standards and expected student outcomes.
- Training for staff on successful ways to assess student progress through rigorous tasks and ways to use the information to inform and improve teacher practice.

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.
- Supporting school staff in Special Education compliance issues, including timely writing of Individualized Education Plans, alternative assessments and other supports and strategies for improving instruction and plans for students with disabilities.

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.
- Facilitating comprehensive supports to review disciplinary and procedural protocols targeted at improving the school learning environment and impacting student outcomes.
- Working with community based organizations in order to provide enrichment and recreational activities for students, including PSAL and the NYU Liberty Partnership Program.

Given ABCD's lack of success, despite the availability of these supports, it is apparent that ABCD has failed to develop the proper infrastructure to meet the needs of its students and families. After a comprehensive review of ABCD with the goal of determining what intensive supports and interventions would best benefit the ABCD community, the DOE concluded that only the most serious intervention, the closure of ABCD, will best serve the school's students and community. Indefinitely trying to turn around a school that has struggled for years is not viable.

- Comment 2(g) states that SC special education classes are not offered at ABCD.

The DOE notes that SC special education classes were offered at ABCD in grades nine through twelve. SC special education seats for grades six through eight at ABCD were funded in the beginning of the year by the DOE, however, those seats were not filled and, therefore, the classes were not offered.

- Comments 2(a), 12, and 26 relate to the Mayor’s black and Latino male initiative.

While the DOE acknowledges the Mayor’s current initiative to help support black and Latino males across New York City, the DOE remains committed to providing quality school options that serve all students. The DOE holds all schools, whether themed, new, old, big, or small, to the same high standards in a concerted effort to ensure that all students have access to high-quality school programs. If a school cannot meet those standards, the DOE will consider all possible interventions, as outlined above, including phase-out or closure.

- Comments 2(c, e, f, l), 10, and 24 concern ABCD’s budget, the hiring of staff, and the allocation and management of resources.

Contrary to the suggestions that DOE has withheld resources and funds from ABCD, ABCD’s budget was reduced over the years due to the Citywide budget reduction. Further, the school’s budget loss can be attributed to the school’s declining enrollment over the last several years. Tax levy school funding is distributed on a per pupil basis. Prior to the beginning of the year, principals hire a staff to begin on the first day of school with the expectation that the school will enroll a certain number of students, including certain numbers of special education and/or English Language Learner students. If a school admits a substantially lower number of students or lower number of special education and/or English Language Learner students than its anticipated targets, the DOE will make corresponding changes in the school’s budget. Once enrollments have stabilized in late September, principals work with their Children First Networks to prioritize their budgets for the year and ensure there are adequate funds to pay for staff salaries and other resources. Schools are responsible for the financial impact of the change in register between the projection and the audited register. If they spend more funds than they would have been entitled to receive based on their actual enrollment, they are considered to have a “deficit.”

It is not uncommon for schools to be faced with a deficit. The DOE works closely with principals to ensure a proper plan is in place. Over the past three years, over 200 DOE schools have accumulated approximately \$47 million in deficits.

Typically, deficits are a byproduct of budget overruns as a result of a school missing its projected enrollment target. Principals participate in the register projection process in the prior spring and must approve the projection for their school.

As mentioned above, tax levy school funding is distributed on a per pupil basis. If a school admits a substantial number of students or specific cohort of students below its anticipated target, it could have a material impact on the school's budget (e.g., 15 general education students = ~\$63,000, whereas 15 special education high school students in an integrated classroom setting = ~\$216,00). Students with greater special needs generate a higher pupil per capita in the Fair Student Funding allocation formula.

As it pertains to the comment 2(e)'s contention that there has not been staff on the budget to support literacy and math growth, there are no discrete allocations for Literacy or Math Coaches in the Fair Student Funding Model. Hiring and budget decisions are made by the principal. Further, the DOE confirms that the school has received allocations for math staff, and currently, there are three math teachers on staff. Additionally, ABCD has a Dean and a consultant that provides PD.

- Comments 2(n), 10, and 11 concern shared spaces in K258, and the contention that ABCD has no use of a library.

ABCD does have use of the library in K258. When Leadership Prep Bed Stuy was originally sited in K258, the Office of Space Planning placed Leadership Prep Bed Stuy on the second floor. As a consequence, the library space, which had previously been on the second floor, was relocated to the basement. Leadership Prep Bed Stuy paid for the re-location of all books, supplies, and furniture to the new library space in the basement, in addition to paying for a renovation of the basement space in an effort to make the space appropriate for use as a library for all students in K258. Currently, the library on the basement floor exists as a shared space and both ABCD and Leadership Prep Bed Stuy can program the space for use for their respective student populations.

- Comments 2(k), 3(b), 5, and 15 concern the community engagement and the Chancellor's Regulation A-190 processes.

In order to incorporate school and community input into the decision-making process, in October and November 2011 the DOE held conversations with 47 struggling schools (41 district schools and 6 public charter schools) that were eligible for an intensive support plan or intervention. In these conversations the DOE shared information about school performance and talked with the community about their reflections of the school's strengths and weaknesses.

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

Superintendents met with the SLTs, staff, and parents to explain why the school is considered struggling and what particular factors show this to be the case.

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

When the DOE announced its recommendation to propose ABCD for closure, dedicated teams of educators and engagement specialists spent several days back in the schools meeting with teachers, parents, and students.

The DOE decided to propose the closure of the entire school, rather than just the middle school grades, after much thoughtful consideration. The school currently serves very few students, only 44 current sixth grade students and 36 seventh grade students. In high school, ABCD is only serving 33 ninth grade students, 22 tenth grade students, 29 eleventh grade students, and 16 twelfth grade students. Such a small student enrollment is evidence that the school is not demand by the community. Truncating the middle school would have left a high school of not many more than 100 students (including a new incoming ninth grade). A school of that size would not have the resources needed to thrive.

The DOE notes that at this time, the proposed closure of ABCD is not final because it has not yet been approved by the Panel on Educational Policy.

- Comments 6, 7, 9, and 18 concern the students' transition to another school if ABCD is closed.

The DOE acknowledges that transitioning to a new school can be difficult. While many members of the ABCD community objected to the possibility of closing the school for a variety of reasons, the DOE believes that drastic action must be taken given the school's longstanding performance struggles and the very low demand for seats at the school.

The Office of Student Enrollment will continue to work with current students and families of ABCD students as they help identify placement options and support students and families in this process. As detailed in the EIS, the placement options for current ABCD students are outlined below.

Current Middle School Students at ABCD

Current sixth grade and seventh grade students will be offered seats in District 13 middle schools and middle schools in the students' resident districts. If this proposal is approved, parents of current sixth and seventh grade students will be informed about middle school transfer options in Spring 2012 by the Office of Student Enrollment. Students must meet the admissions requirements for the school where they will be placed. Students may also

apply to public charter schools in District 13 and Citywide. Charter schools admit students by lottery, which is typically conducted in early April. The Office of Student Enrollment will inform students about the public charter schools that offer admission at the student's grade level and whether any of these schools provide preference for students residing in District 13, however students must apply to the charter school directly for admission.

Current Ninth Grade Students at ABCD

In New York City, the high school admissions process is a citywide choice process. The High School Admissions Process permits an applicant to list up to 12 high school programs in order of preference on his or her application. High school admissions applications were due December 2, 2011. Students who are in 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 ABCD who are interested in attending a different school for tenth grade may have already taken part in this process by submitting an application on or before December 2, 2011. If this proposal is approved in February 2012, there would be another opportunity for current first-time ninth-grade students at ABCD, and students at other schools who have applied to ABCD, to submit a new list of 12 schools in Round Two of the High School Admissions Process. Those interested in applying to attend a different school as a tenth grade student in September 2012 should meet with a guidance counselor.

In March, students will be able to participate in Round Two of the High School Admissions process. Students would submit a Round Two application and would be able to rank schools that have available seats for tenth grade. Students may receive a match as part of Round Two in April. If a student submitted an application as part of Round One of the High School Admissions process, a match received in Round Two will nullify the Round One match.

If the proposed closure of ABCD is approved, current repeat ninth grade students would continue to be served at ABCD until the school is closed at the end of the 2011-2012 school year. If this proposal is approved, the Office of Student Enrollment will inform parents of any current repeat ninth grade student who do not meet promotional standards by the close of the 2011-2012 school year about middle and high school transfer options in Spring 2012.

The DOE urges all current ninth grade students to meet with a guidance counselor regarding applying to a different school for the 2012-2013 school year.

Current Tenth, Eleventh, and Twelfth Grade Students at ABCD

Current twelfth grade students who are on track to graduate will complete high school at ABCD, provided they continue to earn credits on schedule.

Current tenth and eleventh grade students, 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.

The DOE will arrange a new high school placement for all tenth and eleventh grade students, as well as all twelfth grade students who have not accumulated sufficient credits or who have not passed the minimum number of Regents exams to graduate by June 2012.

- Comment 16 expressed support for single-sex educational options.

The following schools offer single sex educational options for male students:

- Excellence Boys Charter School Bedford Stuyvesant (84K593), is an existing charter school located in District 16 which serves male students in kindergarten through eighth grade. For further information, please visit: <http://excellenceboys.uncommonschoools.org/excellence-boys/our-school>
 - Eagle Academy for Young Men (09X231) is an existing secondary schools located in District 9 in the Bronx. Eagle Academy for Young Men serves male students in grades six through twelve. For more information, please visit: <http://schools.nyc.gov/NR/rdonlyres/D18E3524-45FE-4555-A264-9AE42CCFF3FE/112146/District9MSDpart3.pdf>
 - Eagle Academy for Young Men II (23K644) is an existing secondary schools located in District 23 in Brooklyn. Eagle Academy for Young Men II currently serves male students in grades six through nine, and is in the process of phasing in to eventually serve students in grades six through twelve. For more information, please visit: <http://schools.nyc.gov/NR/rdonlyres/65D6799F-6A2E-4510-816D-00145B9FF446/111831/District16MSD1.pdf>
 - Eagle Academy for Young Men III (29Q327) is an existing secondary schools located in District 29 in Queens. Eagle Academy for Young Men III currently serves male students in grades six and seven, and is in the process of phasing in to eventually serve students in grades six through twelve. For more information, please visit: <http://schools.nyc.gov/NR/rdonlyres/90FB7AF7-0A1A-40EB-BDC5-F998E85BC40A/113450/District29DwideInfoPacket.pdf>
- Comment 19 concerns the lack of a guidance counselor at ABCD.

This statement is inaccurate inasmuch as there is currently a guidance counselor and a social worker on staff at ABCD.

- Comment 27 concerns class size.

Class size is primarily determined by how principals choose to program students at their school within their budget. Thus, no particular proposal, in and of itself, necessarily

impacts class size. The Citywide instructional footprint relies upon the current programming at a school (number of sections) to determine the baseline footprint allocation. Decisions to co-locate schools are not based solely on the utilization figures in the Blue Book. The DOE also considers the total number of classrooms in the building and the number of sections currently programmed at all schools in the building or projected to be programmed to determine the availability of excess space and the baseline footprint for each school.

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

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

Changes Made to the Proposal

No changes have been made to this proposal.