



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: February 8, 2012

The Proposed Phase Out of Gateway School of Environmental Research and Technology (08X295, “Gateway”), Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

On December 21, 2011, the New York City Department of Education (“DOE”) proposed to phase out Gateway School of Environmental Research and Technology (08X295, “Gateway”), an existing high school in building X450, the Adlai E. Stevenson Educational Campus (“X450” or “Stevenson Campus”), located at 1980 Lafayette Avenue, Bronx, NY 10473, within the geographical confines of Community School District 8 (“District 8”). It currently serves students in grades nine through twelve. The DOE proposed to phase out Gateway based on its poor performance and the DOE’s assessment that the school lacks the capacity to turn around quickly to better support student needs. In a separate Educational Impact Statement (“EIS”), also posted on December 21, 2011, the DOE proposed to co-locate a new high school in building X450.

If this proposal is approved, Gateway will no longer admit new ninth-grade students after the conclusion of the 2011-2012 school year. The school will continue to phase out one grade level at a time, and current students will be supported as they progress towards graduation while remaining enrolled at Gateway. 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 Gateway completes phasing out.

Gateway is co-located with Bronx Guild (08X452), an existing high school serving students in grades nine through twelve; Millennium Art Academy (08X312, “Millennium”), an existing high school serving students in grades nine through twelve; Pablo Neruda Academy for Architecture and World Studies (08X305, “Pablo Neruda”), an existing high school serving students in grades nine through twelve; Bronx Community High School (08X377, “Bronx Community”), an existing transfer high school serving students in grades nine through twelve; Antonia Pantoja Preparatory Academy (08X376, “Antonia Pantoja”), an existing secondary school serving students in grades six through ten that is still phasing in; Bronx Bridges High School (08X432, “Bronx Bridges”), an existing high school serving students in grades nine and ten that is still

phasing in; and the School for Community Research and Learning (08X540, “SCRL”), an existing high school currently in its second year of phasing out pursuant to a proposal previously approved by the Panel for Educational Policy (“PEP”). In addition, X450 houses a pre-kindergarten program operated by P.S. 138 Samuel Randall (08X138, “P.S. 138”), and a Young Adult Borough Center, Stevenson YABC (08X507, “YABC”).¹ A community based organization (“CBO”), Good Shepherd Services (“Good Shepherd”), is also located in building X450, where it partners with a number of schools on the Stevenson Campus, as well as with the Stevenson YABC program.

A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias. Antonia Pantoja will serve students in grades six through twelve when it reaches full scale in the 2013-2014 school year. Bronx Bridges will also reach full scale in the 2013-2014 school year when it will serve students in grades nine through twelve. SCRL began phasing out in September 2011 and will no longer enroll students following the 2013-2014 school year.

If this proposal is approved, Gateway will begin phasing out one grade at a time, beginning in September 2012, and will complete its phase-out after the 2014-2015 school year. In another EIS, the DOE proposed to open a new high school, 08X561, in building X450 in September 2012. The new school would open with ninth grade, adding one grade annually until it reaches full scale in the 2015-2016 school year, with a grade span of nine through twelve. If this proposal is approved, SCRL will continue to phase out of X450 as planned, while Antonia Pantoja and Bronx Bridges will continue to phase in as planned.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at the Stevenson Campus on January 27, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 131 members of the public attended the hearing, and 34 people spoke. Present at the meeting were Pablo Neruda SLT members Rossibel Taveras and Jeanette Pagan; Gateway SLT members Clifford Siegel and Yesenia Lopez; SCRL SLT member Peggy Orellana; Millenium SLT member Maxine Nodel; Bronx Bridges SLT member Hannah Ellis; Bronx Community SLT member Francis D’Souza; CEC 8 members Otis Thomas and Laverne Berry; PEP representative Wilfredo Pagan; and Amanda Cahn and Stephanie Crane from the Division of Portfolio Planning.

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

1. Several commenters voiced support for Gateway (including Wilfredo Pagan, newly appointed Bronx borough appointee to the PEP).
2. Multiple commenters praised the school staff.
3. One commenter voiced support for the arts on the Stevenson Campus.
4. Several commenters voiced general opposition to the proposal.
5. Multiple commenters (including two Gateway SLT representatives) stated that providing additional funding to Gateway—money that will instead go to Gateway’s replacement—would be a more productive intervention than phase-out; multiple commenters also expressed the belief that Gateway could be a great school with the proper resources.

¹ Young Adult Borough Centers (“YABCs”) are evening academic programs designed to meet the needs of high school students who might be considering dropping out because they are behind or because they have adult responsibilities that make attending school in the daytime difficult.

6. Multiple commenters asked about supports provided to Gateway students and questioned the sufficiency of supports that have been provided; one commentator sought documentation of supports provided.
7. Multiple commenters expressed concerns about phase-out relating to Gateway's role in the community—for example, that Gateway is a community legacy for students and also that it is the hub where many students receive their first meal of the day.
8. Multiple commenters pointed to recent improvements in Gateway's graduation rate, and noted that Gateway's graduation rate is higher than average for its peers, in giving reasons why phase-out is difficult to accept; one commenter said that the graduation rate rose by 13%, while another said that Gateway improved its graduation rate from 45% to 52% and its Regents pass rate from 19% to 37% in 2011.
9. One commenter questioned Gateway's graduation statistics.
10. One commenter questioned the use of quality reviews in making phase-out determinations, as they do not take into account the environment of the school's community.
11. One commenter questioned the use of data about college-bound students in making phase-out determinations, as this number understates Gateway's college progress because the numbers are based only on students who go to CUNY schools and do not take into account students who go to college elsewhere.
12. One teacher said that the DOE told Gateway that the best way to improve its Progress Report grade was to recruit better students, but that she feels her job is to teach all students, not to recruit and teach only the best students.
13. One commenter stated that this proposal would affect predominantly minority students, as Gateway is located in a minority neighborhood. Another commenter stated that the DOE is only targeting certain districts and neighborhoods for school phase-outs, primarily in the Bronx and Brooklyn.
14. One commenter asked how students would retrieve documents from Gateway after it is phased out.
15. One commenter asked why the Progress Report does not recognize students in the armed forces in the same way it recognizes students enrolled at community colleges.
16. One commenter said that Gateway students have been asking where they will go to school, should the proposal be approved.
17. One commenter asked how the DOE can close a school without a teacher evaluation system.
18. One student at Gateway asked why the school now has fewer honors programs and fewer free periods for students to pursue internships.
19. Multiple commenters expressed concern for English Language Learners served by Gateway; one commenter noted 15% of students are English Language Learners.
20. One commenter expressed concern for special education students at Gateway, noting that they comprise 25% of the school's population.
21. Multiple commenters noted that Gateway will admit any student and that it is important to have a local high school that serves the general community, as opposed to new schools that turn away students.
22. One commenter noted that new schools (such as Gateway's replacement) won't report performance data for as long as four years.
23. Multiple commenters questioned the efficacy of phase-out as an intervention strategy; one commenter noted that Gateway itself had been a replacement school for Stevenson High School, which was closed, while another said that 11 of the schools being proposed for phase-out were opened under the Bloomberg administration, and another questioned what difference replacing Gateway with a new school of a different name will make.
24. Multiple commenters said that closing the school sends the message that students were part of a school that was not good enough to stay open.

25. One commenter felt that a decision about whether Gateway would be phased out had already been made.
26. One commenter pointed out that smaller schools in one building require the DOE to hire more school principals (and thus expend more money) than under the previous system, by which 1 principal and 12 assistant principals could serve an entire building.

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

27. One commenter stated that two minutes for each commenter during the hearing does not allow sufficient time for an argument.
28. One commenter asked why more than 60% of the PEP is appointed by a mayor who has no background in education.
29. One commenter stated that the mayor has not taken responsibility for any of the schools started under his administration.
30. One commenter said that Lehman High School went from an “A” to an “F” on its progress report overnight.
31. One commenter observed with disappointment the empty chairs at the dais, noting that it is hurtful to have so few people on the panel during a hearing about such an important issue.

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

The DOE received two written comments and no oral comments through the dedicated Web site and phone line for this proposal.

32. District 8 CCHS representative Evelyn Rodriguez submitted a statement asserting the following points:
 - a. Environmental science is a growing field that is valuable for New York City students.
 - b. It is important to keep Bronx schools intact because parents want local options.
 - c. Gateway shouldn't be compared to the schools with which it is co-located; rather, it should benefit from being co-located with high-performing schools.
 - d. It is not in the best interest of Gateway students to suggest that they are failures.
 - e. Gateway has an 80% attendance rate and only last year had a B on its Progress Report; therefore, the school should remain open.
33. 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 1, 2, and 3 voice general support for the school and its campus, and do not require a response.

The DOE acknowledges and commends the students, staff, leadership, and partners of Gateway for their hard work, dedication, and passion for the school.

Comment 4 expresses general opposition to the proposal. The DOE understands the crucial role that schools play in the lives of New York City’s students and their families. Public schools are central to the history and identity of communities across the city, which is why deciding to phase out a school is the toughest decision the DOE makes. However, the DOE believes that this proposal represents the right course of action for the students of New York City.

Comment 5 concerns funding for New York City public schools. While every school across the city receives funding via the same formula, some schools have been less successful in serving students than their peer schools that serve similar populations. Additionally, Gateway has been given additional resources in the form of the many supports provided to the school through their Network and described in the response to comment 6 below. Despite these additional resources, Gateway has been unable to significantly boost student achievement.

New schools are funded in the same manner as other schools: funding follows the students and is based on need (incoming proficiency level and special education/ELL/Title I status). While it is true that new schools do receive start-up funding averaging \$30,000 per year over the first five years for an elementary or middle school and \$34,000 for a high school, the difference in funding between a new school and an existing school is marginal – the annual amount of startup funding is not even large enough to cover the salary of a first-year teacher.

Because Gateway has not been able to use its funds to successfully turn around, the DOE feels that resources—which are not substantially more for a new school than for an existing school—would be better allocated to a new school option.

Comment 6 concerns supports provided to Gateway to help it turn around. As listed in Section I of the Educational Impact Statement for the proposal to phase out Gateway, the DOE has made extensive strategic improvement efforts at Gateway, including:

Leadership Support:

- Training the principal and assistant principals to help them set clear goals for the school while developing the school’s Comprehensive Education Plan and Language Allocation Plan.
- Coaching and training leadership on implementing plans in support of Citywide instructional initiative.
- 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 heighten instructional expectations, student interest, and classroom rigor.
- Supporting the school in assessment design, curriculum mapping, and student feedback collection as tools aimed at meeting the necessary standards and expected student outcomes.
- Training staff on successful ways to assess student progress through rigorous tasks and use the information to inform and improve teacher practice.

Operational Support:

- Advising school staff on managing budgeting, human resources, teacher recruitment and building logistics.
- Supporting school staff in developing strategies and practices for improving student attendance and addressing attendance concerns.
- Supporting school staff in Special Education compliance issues, such as the timely writing of Individualized Education Plans and alternative assessments, and providing 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 to enable them to better provide social and emotional support to students at the school.
- Facilitating review of disciplinary and procedural protocols targeted at improving the school learning environment and student outcomes.

Additionally, Gateway's network leader, Lawrence Pendergast, was present at the hearing and elaborated on the supports the network provided to Gateway, noting that school support takes many different forms, some of which are far more visible than others. The network collaborated with Gateway's administration to develop school-wide goals informed by performance data. The network advised the school on the short-term and long-term development plans. It provided funding for teachers to participate in summer trainings around curriculum development.

Beyond instructional support, the network offered operational support for the school, including the assignment of an assistant principal to Gateway at no cost to the school's operating budget. The network worked with the school to ensure that supplementary grants and allocations were scheduled and spent according to government regulations and provided support to the school's administration in the areas of safety matters and professional development.

Mr. Pendergast offered to answer specific questions about supports provided to Gateway after the hearing. Parties with outstanding questions about those supports should contact Gateway's principal.

Comment 7 concerns the legacy of Gateway and its role in the community. The DOE recognizes the important role that schools play in their communities and knows that schools throughout the city are not just educational institutions, but rich and tight-knit communities. The DOE expects that the replacement school will be fully engaged with its community and responsive to the community's needs, serving a vital role as an anchor for the community.

Comments 8, 9, and 32(e) concern Gateway's graduation rate and other measures of performance. While Gateway's 2011 graduation rate did rise from 45% to 52%, it remained well below the 2010 Citywide average of 65.1% and placed the school in the bottom 12% of schools Citywide. Gateway's 2011 graduation rate placed the school in the bottom 38% of its peer group, which, contrary to statement in comment 8, indicates that Gateway's graduation rate was actually below average for its peer group. Additionally, over the same time period, Gateway's six-year graduation rate declined from 72% to 64%. Gateway's attendance rate of 80% places the school in the bottom 17% of schools Citywide. The DOE recognizes that Gateway received a B on its Progress Report last year, but its graduation rate has been declining over the past four years and the school's 2010-2011 Progress Report included multiple indicators that the school is continuing to struggle.

Comment 10 concerns the Quality Review's consideration of a school's community. The Quality Review is intended to determine how well a school is organized to educate its students. Quality Reviews do not consider factors such as the neighborhood in which a school is located or the demographics of the students served by a school, because the focus of the review is on the development and maintenance of organizational structures that may be found in any school in any neighborhood. However, the Progress Report indexes each school's grade to a group of 40 schools that serve similar populations. As described below in the answer to comment 13, the DOE does look at Progress Report scores in making phase-out decisions.

Comment 11 concerns the DOE's definition of college enrollment in the Progress Report. Contrary to the statement made in comment 11, the Progress Report's measure of college enrollment includes students enrolled in a 2-year or 4-year degree program, whether or not that program is affiliated with the City University of New York.

Comment 12 concerns advice given to the Gateway staff on how to improve the school's performance. The DOE does not encourage schools to intentionally seek out and enroll students with high entering proficiency rates. City high schools should meet the needs of all students regardless of entering proficiency. Additionally, the majority (60%) of a school's Progress Report grade comes from the progress made by students in the school. Progress is measured against entering proficiency, which means that even students with the lowest entering proficiency can contribute to a positive mark on the Progress Report if their proficiency improves.

Comment 13 states the concern that the DOE targets specific communities and schools with a high percentage of minority students for phase-out. The DOE does not consider demographics when making decisions around interventions for struggling schools; rather, 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 considers 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 Persistently Lowest Achieving (“PLA”) by the State Education Department; and/or
- For high schools: Received a recommendation on their 2010-2011 Joint Intervention Team (“JIT”) review for significant change in organizational structure or phase out/closure.²
- For elementary and middle schools: Received a C or D recommendation on the 2010-11 JIT review.

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 City average. The City average for 2010-11 is 65.1% and/or
- Elementary and middle schools that have a higher English Language Arts and Math average proficiency than their district average or the City average (whichever is lower). The city average for 2010-11 is 50.6% proficient; and/or
- Schools that received an A or B on the 2010-11 Progress Report; and/or
- Schools that earned a Well Developed or Outstanding score on the most recent Quality Review; and/or
- Schools receiving a Progress Report for the first time in 2010-2011.

Schools that are removed from consideration for the most intensive support or intervention receive differentiated support from their Children First Network team, but are not in consideration.

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, 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.

² JIT is an NYSED mandated intervention designed to assess the school’s educational program, using multiple measures of quantitative and qualitative information and make recommendations to the Joint Intervention Team (JIT), comprised of a senior State Education Department (SED) representative and a senior DOE representative.

For the majority of schools investigated, 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– 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, analysis and engagement directed the DOE 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.

Comment 14 concerns the retrieval of documents from Gateway, should the school be phased out. Another school on the Stevenson Campus would retain and maintain student documents for Gateway. Former Gateway students would be able to retrieve documents from that school.

Comment 15 concerns the recognition of students in the armed forces in a school’s Progress Report. The DOE continues to work to improve the Progress Report by refining the current metrics used and by adding new metrics to make them more robust. The DOE’s Division of Accountability, Performance and Support has worked to include data around high school graduates who enter the armed forces but have encountered challenges in soliciting information from the armed forces.

Comment 16 concerns the impact of the phase-out proposal on students currently enrolled at Gateway. Current students will be supported as they progress towards graduation while remaining enrolled at Gateway. 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 Gateway completes phasing out.

Comment 17 concerns the role of teacher evaluations in phase-out decisions. The DOE’s proposal to phase out Gateway is not based on individual teacher evaluations. Rather, the decision is based on a number of criteria, enumerated above in the response to comment 13, and metrics that measure Gateway’s effectiveness.

Comment 18 concerns the declining availability of honors programs and free periods at Gateway. Throughout the city, principals are given latitude to structure their instructional program in the way they see as providing the maximum benefit for their students. Principals will often make adjustments to the structure and program of their academic schedule in response to changes in demand for certain programs or the availability of funding to support those programs. The DOE is typically not involved with specific, school-based decisions around instructional programming and the structure of a school’s academic schedule.

Comments 19 and 20 state concern about special education students and English Language Learners at Gateway. In the 2011-2012 school year, 25% of the students at Gateway have an individual education program (“IEP”) and 13% of students are English Language Learners (“ELL”). If this proposal is approved, all current Gateway students who have IEPs or are ELLs will continue to have their needs met as they progress towards graduation.

The school that replaces Gateway would be limited unscreened and would admit students through the Citywide High School Admissions Process in the same way that Gateway currently admits its students. This means that the replacement school will admit students with IEPs and ELL students, and will do so in the same manner as general education students.

Not only will future English Language Learners and students with IEPs be admitted in the same way at the replacement school as they are at Gateway, they will also have their needs met at the new school. The new school will create programs that meet the needs of all students, while ensuring access to a general education curriculum to the greatest extent possible.

Comments 21 and 22 concern enrollment policies and performance data for new schools, including Gateway's replacement. The school proposed to replace Gateway would have a limited unscreened admissions process, meaning that no students would be turned away based on their academic history or special needs. New high schools receive a Progress Report each year beginning in the year after the school opens. However, a new high school's Progress Report does not include the full range of performance measures until the school has graduated its first class of students.

Comment 23 notes that several schools opened under the Bloomberg administration, including Gateway, are proposed for phase-out and asks how the DOE can expect the new replacement schools to be successful if schools like Gateway couldn't be successful. This year, the DOE is proposing to phase out seven schools and truncate three schools that were opened under this Administration (since 2002). These ten schools represent less than 3% of the schools opened since 2002.

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

This comment also concerns the differences between Gateway and the proposed replacement school. The proposed replacement school will not just be a renamed Gateway. Rather, it will be fundamentally different from Gateway, offering a new organization and new structures to better support student learning. The school will develop programs to meet the needs of its students and the community and will provide New York City high school students with a new option.

Comments 24 and 33(d) concern the message that phasing out a school sends to that school's students. Decisions around the future of a school in no way reflect on the students who attend the school. Whenever the DOE makes the decision to move forward with a proposal to phase out a school, it is because students deserve a better option.

Comment 25 concerns whether community feedback is factored into the DOE's decision-making process. The DOE welcomes all feedback from the community regarding a proposal. When the Educational Impact Statement regarding the proposed phase-out of Gateway was issued, the document was made available to the staff, faculty, and parents and on the DOE's Web site. In addition, the DOE dedicates a proposal-specific Web site and voicemail to collect feedback on this proposal. Furthermore, all schools' staff, faculty and parent communities are invited to the Joint Public Hearing to solicit further feedback. The DOE has given thoughtful consideration to this input.

Although the DOE recognizes that people in the community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities at Gateway will be able to create productive and collaborative partnerships.

Comment 26 concerns the DOE's policy of replacing large, underperforming, comprehensive high schools with multiple smaller schools.

In 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.)

The findings of this report speak to the promise of small schools and undergird the DOE's commitment to opening small schools, as has been done on the Stevenson Campus.

Comment 32(a) concerns the value of Gateway's environmental science interest area. A number of schools in the City also offer programs in the same "Interest Area" (Environment) as Gateway. Appendix A in the EIS lists City schools offering programs in the Environment interest area. Appendix A also includes the percentages of ELL students and students with disabilities that attend each of these schools so that families can understand more about the demographics at certain schools and can use this information to help determine the appropriateness of other options.

According to the New York City High School Directory, Gateway's mission has been, in part, to attract students "interested in learning about the environment with emphasis placed on science and math." The Bronx offers a number of other high school programs emphasizing science and math. Appendix B in the EIS lists Bronx schools in the Science & Math interest area.

Additionally, as indicated by the school's name (the Gateway School for Environmental Research and Technology), the school has also sought to provide targeted instruction in technology. Please see Appendix C in the EIS for a list of other schools in the Bronx in the Computer Science & Technology interest area. Appendices B and C also include the percentages of ELL students and students with disabilities at each school listed.

The DOE recognizes the importance of educational programming in the Environment, in Science & Math, and in Computer Science & Technology, and will work to continue providing quality educational options in those fields.

Comment 32(b) concerns the need for local high school options in the Bronx. The DOE is proposing to open a new school on the Stevenson Campus concurrent with its proposal to phase out Gateway. In addition to the other schools currently co-located on the Stevenson Campus, the new school will provide residents of the community with a local high school option.

Comment 32(c) concerns the comparison of Gateway with its higher performing neighboring schools. The Progress Report indexes Gateway's performance to a group of 40 peer schools with similar demographics. Only one of those 40 schools, Pablo Neruda, is co-located with Gateway

on the Stevenson Campus. The DOE encourages all co-located schools to collaborate and leverage their resources for mutual benefit.

Comment 33 concerns class sizes in New York City public schools. 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.