



Public Comment Analysis

Date: February 2, 2011

Topic: The Proposed Phase-out of Beach Channel High School (27Q410)

Date of Panel Vote: February 3, 2011

Summary of Proposal

Beach Channel High School (27Q410, “Beach Channel”) is an existing high school located at 100-00 Beach Channel Drive, Rockaway Park, NY 11694, located within the geographical confines of Community School District 27. It currently serves students in grades nine through twelve. The New York City Department of Education (DOE) is proposing to phase out and eventually close Beach Channel 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, Beach Channel would be phased out gradually over the next several years. Beach Channel would no longer admit new ninth-grade students at the end of the 2010-2011 school year. Current students would be supported as they progress towards graduation while remaining enrolled in Beach Channel. In cases where students do not complete graduation requirements by the June 2014 closure date, the DOE will help students and families identify alternative programs or schools that meet students’ needs so that they may continue their education after Beach Channel completes phasing out.

Beach Channel is located in building Q410 and is currently co-located with Channel View School for Research (27Q262, “Channel View”), Rockaway Park High School for Environmental Sustainability, (27Q324, “RPHSES”), and a District 75 Special Education Teacher Support Services (“SETSS”) school (75Q256, “P256”). Channel View is a school that opened in 2004 that serves students in grades 6-12. RPHSES is a new high school that opened in September 2010 with its first cohort of 9th grade students. The school is still phasing into the building, adding a new grade of students annually. When RPHSES completes its expansion in the 2013-2014 school year, the school will serve students in grades 9th through 12th. P256 serves emotionally disturbed, autistic, or multiply handicapped students in grades 9-12. Building Q410 also offers free childcare and support services for student parents through the Living for the Young Family Through Education program (“LYFE”).

In 2009-2010, Q410 had a target capacity to serve 3,254 students. The three schools within the building last year enrolled a total of 1,947 students—1,275 students at Beach Channel,

564 students at Channel View, and 108 students at P256. Thus, the building utilization rate was 61% of total capacity. This current year there are 1,848 students projected to be enrolled in the building—1,094 at Beach Channel, 548 at Channel View, 98 at P256, and 108 at RPHSES, yielding an estimated utilization rate of 57% of target capacity. This means that the building is “under-utilized” and has extra space to accommodate additional students. If this proposal is approved, the other schools located in the Q410 building would continue serving their current students, with RPHSES adding one grade per year as it continues to expand to full scale by 2013-2014.

In a separate Educational Impact Statement (EIS), posted on December 13, 2010 and amended on January 12, 2011, the DOE also proposed that 27Q351, a new high school with a “limited unscreened” admissions policy, begin phasing into the Q410 campus. If approved, 27Q351 would enroll a ninth-grade class in the 2011-2012 school year. This new school would continue growing to full scale as Beach Channel phases out, and would complete its expansion during the 2014-2015 school year, at which point it would serve students in grades 9-12. The amended EIS can be accessed here:

<http://schools.nyc.gov/community/planning/changes/queens/BeachChannel>

A copy of the amended EIS is also available in the main offices of Beach Channel High School, Channel View School for Research, Rockaway High School for Environmental Sustainability, and P256.

Summary of Comments Received Prior to the Official Public Comment Period

Certain comments were received during meetings with parents and community members prior to the comment period on this proposal. Although these comments were not received during the comment period, as a courtesy, the DOE wishes to acknowledge it received one written comment explaining that the problem with the school was the administration, and the teachers currently at the school would serve it much better if the school were fixed.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at Beach Channel High School on January 13, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 80 members of the public attended the hearing, 14 people offered comments on the proposal, and 9 questions were submitted. Present at the meeting were Beach Channel SLT members David Pecoraro and April Wallach; Channel View SLT member Craig Dorsi, CEC 27 representative Charlyene Blunt; CCHS representatives Martin Krongold and Monica Ayuso; High School Superintendent Juan Mendez; Deputy Chancellor Shael Suransky; Anthony Conelli of the Division of School Support and Instruction; Keith Dumanski from Assemblywoman Audrey Pheffer’s office; Assembly District Leader Lew Simon; and Ciara Donley from Council member Eric Ulrich’s office.

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

1. Beach Channel SLT Member David S. Pecoraro stated his belief that the hearing was null and void for being in violation of Chancellor's Regulation A-660, because a public notice for the hearing was sent out in Spanish only two days previously, not ten days in advance.
2. Beach Channel SLT Member David S. Pecoraro asked whether new schools that open in buildings to replace phase out schools accept the same number of ELL, overage and other high needs students.
3. Beach Channel SLT Member David S. Pecoraro stated that there has been no support for the students and staff of Beach Channel High School, despite what is stated in the EIS.
4. Beach Channel SLT Member David S. Pecoraro commented on the loss of extracurricular activities and programs at Beach Channel over the years. He stated that Beach Channel High School is the last school on the Rockaway Peninsula that guarantees a seat for students who live there. He disputed Deputy Chancellor Suransky's statement that new schools admit students similar to previous schools that have phased out.
5. Beach Channel SLT Member April Wallach stated her sadness at the loss of resources and extracurriculars at Beach Channel.
6. High School Superintendent Juan Mendez stated that Beach Channel is on New York State's list of Persistently Lowest Achieving (PLA) schools. He stated that we must do better if schools are not graduating over 50% of students in a timely fashion. He stated that the principals in the Beach Channel building have worked together on protocol to share resources between the schools in the building.
7. Citywide Council on High Schools Representative Martin Krongold stated that the phase out and closure of high schools is handled poorly by the DOE. He asked parents to stay informed about the process of phase out. He stated five problems with the EIS: one, why didn't the DOE's support for Beach Channel succeed?; two, students left behind due to the phase out should get priority to new school options; third, will Clusters and Superintendents work hard to support failing schools; fourth, DOE must ensure the remaining staff is experienced and high quality as Beach Channel phases out; fifth, the phase out policy causes remaining struggling schools to become overcrowded and next in line for phase out. He stated that he does not believe Beach Channel should phase out.
8. Citywide Council on High Schools Representative Monica Ayuso stated that during the pre-engagement sessions, after Beach Channel was placed on the Persistent Low-Achieving Schools (PLA) list the DOE did not provide a long-term plan with regard to the support and resources it was going to give the school. She continued by stating that the EIS fails to provide details about what kind of

- resources and support were given to the school over the past two years and that the troubles for Beach Channel began when Far Rockaway was phased out 5 years ago and students that would have gone there came to Beach Channel. She finished by stating that as a part of the lawsuit the DOE was required to give the proposed phase out schools additional resources and that did not happen.
9. Assembly District Leader Lew Simon called for the return of extracurriculars that used to be available at Beach Channel, and for a five-year education plan to help the school turnaround.
 10. One commenter asked whether every student would have a seat in a community school in his or her district.
 11. Multiple commentators stated that Beach Channel has received more high needs students over the past few years, and have not gotten corresponding resources to support those students.
 12. Multiple commentators stated that Beach Channel has lost many of the programs that made the school so successful in previous years, such as Oceanography and Marine Biology, and that the proposed new schools are simply replacing them.
 13. Multiple commenters stated that one of the main reasons Beach Channel has seen a decline in recent years is because they have had an influx of very needy students and they have not been provided with the support or the resources to be able to meet their needs.
 14. Multiple commenters stated that the decline in performance at Beach Channel began 5 years ago when the DOE began to implement other changes in Queens and that many of the changes have simply forced high needs students to attend school in other parts of the district which has led to overcrowding and to some schools having to accept a disproportionate amount of high needs students which has led to a decline in their success.
 15. Multiple commenters expressed concern that the proposal is an indictment of the work the teachers have been doing at Beach Channel and that despite the many changes over the last several years, the staff at Beach Channel has always tried very hard to deliver a high-quality education to its students.
 16. Multiple commenters expressed concern that the proposal appears to be one of a concerted effort by the DOE to shut down all traditional high schools in the city.
 17. Multiple commenters expressed concern that closing down old schools coupled with opening new schools exacerbates segregation in the school system.
 18. Multiple commenters stated that comparing Beach Channel to other schools on the basis of graduation rates is unfair because so many students come in behind or are new immigrants and therefore need 5 or 6 years to graduate.
 19. Multiple commenters stated that proposals like the one to phase out Beach Channel are part of an overarching plan to privatize education by turning everything over to charter schools and that charter schools have far more resources than traditional schools because they have received millions of dollars in contributions.

20. Multiple commenters stated that the DOE has not done enough to help support the school by way of resources, programs or professional development and it is the administration's fault they are on the PLA list.
21. One commentator stated that the money being used to bring in the new school should be used to fix Beach Channel High School instead.
22. One commenter stated that Beach Channel's progress report grade is not an accurate reflection of the school's progress because they have much higher percentages of ELLs and Special Education students than the schools in their peer group.
23. One commenter stated that the DOE treats new schools different than schools that may be struggling by providing them with additional resources and support. The commenter further stated that in the past in the Chancellor's District there were a host of resources that went into struggling schools in order to turn them around that were effective and should be replicated again.
24. One commenter stated that the proposal to phase out Beach Channel was a disregard to the history of the community and that the DOE should consider the loss of that history when we propose to phase out a school.
25. One commenter stated that the school should be given additional attendance teachers so that they may stay in close contact with the students in order to ensure they are coming to class and getting enough seat time in order to succeed.
26. One commenter stated that the joint public hearing is not really a place to get feedback because the decision to phase out the school has already been made and the DOE is not going to reverse its decision.
27. One commenter stated that Beach Channel plays a vital role in the community because it is very difficult for students living in the immediate area to attend schools in other areas of the city because of long commutes. The commenter went on to say that the students in the area need to have options within their own community where they can receive the education they would elsewhere, including AP classes like Calculus and extra-curriculars like swimming, and that will bring the community together.
28. One commenter stated that the school's instructional support services have made significant progress under current leadership, as noted in the Progress Report and evidenced by the 2010 graduation rate.
29. One commenter asked how many students enrolled in the school through the application process last year and how many 9th graders did the school actually take in and how are classes for those students functioning now.
30. Multiple commenters asked about the types of support and resources provided to the school.
31. An issue was raised as to why the school was being considered for closure if its graduation rate is rising.

32. An attendee asked how the community can believe the DOE when it says that they will support new schools on the campus if they have not seen the support from the DOE at Beach Channel.
33. An attendee raised the issue that the idea of a principal of a small school knowing his or her staff better than a principal of a large school is not always true.
34. An attendee asked why the school has not been allowed to excess any of its supervisory staff in order to meet the budget reductions while still serving the students.
35. An attendee asked whether there would be a priority in the enrollment process for students that currently reside in the zone.
36. An attendee asked how the DOE can justify sending kids to Manhattan or Staten Island for high school.
37. One attendee asked why the EIS states that the current utilization of the building is 57% capacity but that after phasing in the building will be 51% utilized?
38. An attendee asked what ‘limited unscreened’ meant with regard to the enrollment policies of the new schools in the building.
39. An attendee asked what happens to students with special needs – ELLs and students with disabilities within the new schools.
40. An attendee asked why there are no drug counselors available for a student body with a history of drug abuse and exposure to drugs, when this service was once available.
41. An attendee asked why there was no representation from the District 27 DLT or CEC.
42. Beach Channel SLT Member David S. Pecoraro questioned the DOE’s progress report and utilization rate methodology. He also expressed his displeasure with the high school superintendent in attendance.

The DOE received a comment at the Joint Public Hearing which did not directly relate to the proposal.

43. Beach Channel SLT Member Craig Dorsi stated his pleasure that the community was attending the joint public hearing. One commenter stated that the DOE should be ashamed of itself for destroying schools in New York City and taking away resources.
44. One commenter expressed his disappointment that the Superintendent did not follow up on a meeting to tour the school with the commenter.
45. One commenter mentioned the qualifications for schools Chancellor.
46. An attendee asked how the residents of the Peninsula who are dependent upon public assistance will survive when the services are cut off.

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

47. The DOE received a comment concerning all phase-out proposals calling for a moratorium on school closings, which stated that the DOE is the servant of the people and is not acknowledging the community's opposition to these proposals. The commenter suggested a facilitated discussion process which would work towards consensus.

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

Comment 6 expresses general support for the proposal and does not require a response.

With regard to comment 1, Chancellor's Regulation A-660 does not require translated materials ten days prior to a joint public hearing. Rather the regulation sets forth the basic rights and responsibilities for parent associations and presidents' counsels. The notice requirements for meetings under Chancellor's Regulation A-660 apply to parent association meetings and not joint public hearings concerning significant changes in school utilization which are governed by Chancellor's Regulation A-190

With regard to comments 2 and question 39, which question the types of students the new schools will serve on the Beach Channel campus: Beach Channel currently serves a high-need population: 20% of students require special education services and 10% are English Language Learners. While it is impossible to predict these percentages for the new schools in the building, the DOE has every expectation that these schools will serve similar high-needs populations and the new school leaders have planned their schools accordingly. Improving services to high-needs students is a key element in the creation of new, small schools. Overall, there is every expectation that over the course of their development and growth, the new schools will become integral parts of the Beach Channel community and respond to the particular academic, social and extra-curricular needs of local students. In addition, there are a number of new schools that opened in 2010 which would continue to serve as options if the proposal to phase out Beach Channel is approved. Schools in Queens that are currently phasing in include, Rockaway Park High School for Environmental Sustainability, Hillside Arts & Letters Academy, High School for Community Leadership, Queens Metropolitan High School, and Cambria Heights Academy.

With regard to comment 3, 7(i), 8, 20 and 30, which question the supports that have been provided to the school: As outlined in detail in the EIS, the DOE has offered considerable support to Beach Channel, including:

Leadership Support:

- Helping the principal develop Beach Channel's Comprehensive Education Plan and set school goals.
- Connecting administrators with other schools to learn effective practices that could be replicated at Beach Channel.

Instructional Support:

- Training for the principal and assistant principal on writing effective observations, using data to make instructional decisions, ARIS, and new state standards.
- Offering teachers workshops about curriculum planning, understanding by design curriculum, standards-based lesson plans, theory of action, curriculum coherence, and instructional rounds.
- Training and on-site support to help teacher teams use data to improve instruction for English Language Learners, special education students, and students performing below grade level.
- Helping the school develop more coherent assessment and grading policies.

Operational Support:

- Working with the school to implement \$182,000 in grant funding, \$142,000 of which was used to create Small Learning Communities and \$40,000 of which supported after-school clubs and activities.
- Providing one-on-one support to school staff on budgeting, human resources, recruiting and retaining talented teachers, and compliance issues.

Student Support:

- Working with the school to help students monitor their progress toward graduation, plan for careers, and get ready for college.
- Training for guidance counselors on how to use scholarship reports and graduation tracking systems.
- Working with the school to introduce an extended-day program that focuses on credit recovery.
- Helping the school improve student attendance and reduce suspensions by using technology to communicate with students who have poor attendance, having attendance teachers make phone calls to parents and visit homes, and working with social workers and guidance counselors to address gang-related issues at the school.

Given these failed attempts to support the school—whether a part of centralized effort to support all schools or individualized plans for Beach Channel—it is apparent that Beach Channel has failed to develop the proper infrastructure and supports to meet the needs of its students and families. It is incumbent upon the Department to attain better outcomes for students.

With regard to comments 4, 5, 8, 9,11, 12, 13, 20, 21, 25 and 40, which question the amount of funding and resources the school has received to fund in-school programs and after school extra-curricular activities: in New York City public schools, funding follows the students and is allocated based on student needs (e.g. increased funding for students with disabilities and English language learners). If a school's population declines from 2,500 to 2,100 students, the school's budget decreases proportionally—just as a school with an increase in students receives more money.

Since the 2005-2006 school year, Beach Channel has experienced a register drop of nearly 1,400 students. As a result of this drop, the school's budget has been reduced accordingly—schools need fewer dollars to educate fewer students.

Like all schools, Beach Channel has endured several rounds of budget reductions since the 2008-2009 school year. However, the school's budget has not been reduced disproportionately compared to other schools. Moreover, principals are empowered to make decisions about how they budget their resources and they are ultimately responsible for determining which in-school and after-school programs should be funded from year to year, based on that budget and student interest.

With regard to comment 7(iii and iv) , which asks about how schools are supported during the phase out: the DOE is particularly focused on ensuring that once schools begin to phase out remaining students are supported throughout the process and have every opportunity to achieve academically and graduate on time. Typically, the staff to student ratio shrinks during a phase-out and students receive greater attention and academic support as they complete their degrees over the 3 years. The make-up of the staff members who remain at the school from year to year will vary depending on individual staff choices and UFT-DOE excessing policies. Phase-out schools continue to be supported by a Network, which assists principals in managing their resources in a way that best serves remaining students as the school shrinks over the 2-3 year phase-out period.

With regard to comment 7(ii), students currently enrolled in Beach Channel will continue as part of the school as it phases out and will have the opportunity to graduate assuming they continue to earn credits on schedule.

Current 9th grade students at Beach Channel will also have the opportunity to apply to a different school for the 10th grade through the High School Admissions Process. High School admissions applications were due December 3, 2010. Current ninth-grade students at Beach Channel High School may have already taken part in this process. If this proposal is approved in February 2011, there is another opportunity for current ninth-grade students to participate in the High School Admissions Process.

Those interested in applying to attend a different school as a tenth grader in September 2011 should meet with a guidance counselor. In early February, a new high school application called the New High Schools Choice Form will be available. These students should submit a New High Schools Choice Form to their guidance counselor by February

28, 2011. Students may receive a match as part of the Main Round of the Admissions process.

If approved, the new school proposed to replace the seats lost at Beach Channel will accept incoming 9th graders in September 2011. While entry to 27Q351 would not be limited to District 27 students, 27Q351 would provide another option to students and families who live in the community. The new school would serve students from throughout the City, giving priority to those students who live in Queens.

With regard to comment 7(v), the phase-out of Beach Channel will not cause other schools to become overcrowded. As is outlined in the EIS, there are sufficient high school seats in Queens to support all students. Few zoned students currently seek to attend Beach Channel High School. In 2009-2010—the most recent year for which audited data is available—only 9% of ninth grade students residing in the Beach Channel High School zone enrolled at the school, meaning that 91% of students guaranteed a seat at the school chose to apply and attend elsewhere. Students residing in the Beach Channel zone do not receive priority admission to the new schools currently phasing in to the Beach Channel campus. If approved, the new proposed high school will also be un-zoned. That said, this proposal has the potential to positively impact students residing in the Beach Channel zone by offering higher-quality options on the campus to families who currently send their children elsewhere in the City—in some cases at a significant distance from their homes. Already, students residing in the Beach Channel zone represent 48% of students enrolled in the new school currently phasing in to the building. As those schools continue to grow and as an additional new high school is introduced to the campus next year, we anticipate that those schools will attract local students back to the building in greater numbers.

In addition to Beach Channel, this year, the DOE is proposing to phase out a second school in Queens: Jamaica High School. Despite the overcrowding experienced in the borough as a whole, Beach Channel is underutilized. If both of the proposals to phase-out Beach Channel High School and Jamaica High School are approved by the PEP, the DOE believes it has effective plans to replace lost seats. Based on the November 1, 2010 enrollment register, Beach Channel High School and Jamaica High School are serving a total of 218 new ninth grade students. This figure represents the current and future demand for combined seats at these two schools.

The DOE is proposing to co-locate a new school in the Q470 and Q410 buildings, respectively. The anticipated total enrollment between these two schools is approximately 220 new ninth grade unscreened high school seats as Jamaica High School and Beach Channel High School phase out. This would offset the 218 ninth grade seats anticipated to be lost by these two proposed phase-outs. Although the utilization of the building is projected to decline due to declining enrollment over the past few years, these new schools will meet anticipated demand for seats in Q470 and Q410. To the extent the DOE observes an increase in demand for seats in future years, it will consider utilizing the remaining space in this building to open yet another school. In addition, the DOE is also proposing to open 24Q585, which would open with a ninth grade cohort in 2011-2012 in

its temporary location in building Q686. It would be permanently sited in building Q585 in 2012-2013, which is located within the geographical confines of Community School District 24.

It should also be noted that given both Beach Channel High School and Jamaica High School were proposed to be phased out last year, in January 2010, the DOE proposed new schools for both buildings which were already approved by the PEP and are currently phasing-in with a cohort of ninth grade students. For Jamaica (Q470), the DOE proposed to phase in two schools: Hillside Academy and Community Leadership. In the Beach Channel building (Q410), as previously noted, the DOE proposed the phase in of RPHSES. Currently, these three schools collectively serve 264 ninth graders. By opening new schools in these two buildings last year and this year, the DOE will have created the capacity for approximately 484 new ninth grade seats in the Beach Channel and Jamaica buildings.

Additionally, the DOE also opened two other new schools in Queens this year: Queens Metropolitan High School and Cambria Heights Academy. In addition to providing new options for Queens students, these schools also helped reduce some of the overcrowding in Queens high schools. There are 411 ninth grade students currently served in the Queens Metropolitan High School and 79 ninth grade students served in Cambria Heights Academy. Although Queens Metropolitan High School is zoned, the other new schools in Queens are all unscreened and represent new and diverse options for students. In total, in September 2010, 754 new ninth grade seats were opened last year and to serve students in Queens. Lastly, Metropolitan Expeditionary Learning School opened in District 28 in 2010, serving students in the sixth and seventh grades. This school is expected to add a grade a year until it serves students in grades 6-12. The DOE anticipates there will be 100 new ninth grade seats available at this school in 2012-2013.

With regard to comment 8, in November 2010 the DOE stated that based on the school's performance history and its status as a PLA school, it was developing an action plan to better support students over the long term. That action plan would take one of two directions:

- *Keep the school open and supporting it through new and more intensive interventions.*

OR

- *Replace the school by phasing out and establishing a new high-quality option.*

Based on all of the research and evidence presented in the EIS the DOE has opted to pursue the 2nd action plan.

With regard to comment 8 and 14, part of which blames Beach Channel's challenges on the previous phase-out and replacement of Far Rockaway High School, and states that Beach Channel has a disproportionate amount of high needs students which has led to a decline in their success:

Like most New York City public schools, Beach Channel serves a high-need population: 20% of students require special education services and 10% are English language learners. But other schools serving similar students have achieved far better results.

- At Explorations Academy, a Bronx school, 20% of students require special education services and 13% of students are English language learners. The school achieved a 70% four-year graduation rate in 2009-2010, with 52% of students earning Regents diplomas.
- At Information Technology High School, a Queens school, 16% of students require special education services and 10% of students are English language learners. The school achieved a 72% four-year graduation rate in 2009-2010, with 56% of students earning Regents diplomas.
- While all students are still not where we'd like them to be, these schools are getting far better results while serving a similar mix of students to Beach Channel.

With regard to comment 8, which asserts that the 2010 lawsuit required the DOE to give proposed phase-out school additional resources, this is incorrect. The lawsuit did not require the DOE to increase funding for these schools above their Fair Student Funding allocation.

With regard to comment 9, in which the attendee requested a five-year education plan to help the school turn around: as expressed in the EIS, at the hearing and in this document, the DOE has supported Beach Channel in a variety of ways over the past several years, but the school has been unable to gain enough traction to demonstrate it has the capacity to rapidly turn around and improve student achievement. The DOE believes that phasing out the current organization and establishing new, small schools in its place is a proven method for improving student results immediately, starting in September 2011.

With regard to comments 4, 10, 27 35 and 36, which relates to availability of high school seats in the Beach Channel community: when the new schools are phased-in to the Beach Channel building, the four organizations will serve approximately 1,458-1,608 students. While local student students will not have priority to these seats, they will be provided with new, high-quality options to replace the current school, which has seen very low interest in its zoned program. Currently, Beach Channel's zoned program attracts only 12% of eligible students, demonstrating that the vast majority of zoned students chose to attend high school elsewhere. Conversely, students residing in the Beach Channel High School zone represent 48% of students enrolled at RPHSES in its first year, demonstrating that the DOE's new school options are attracting student and family interest. As the school grows and it's budget increases, it will add academic programs and extra-curricular activities that respond to the needs and interests of its student body.

To the extent that the DOE observes an increase in demand for seats in future years, it will consider utilizing the remaining space in this building to serve more students.

With regard to comment 15, the DOE recognizes that teachers and staff at Beach Channel have made efforts to improve the school and student performance. However, at the end of the day, a school must be evaluated on student results, not simply teacher efforts.

With regard to comments 16, 17, 19 and 33, which question the overall strategy to improve school performance by phasing out struggling schools and improving them with new, small school options and charter schools: the DOE strives to create a system of great schools. To accomplish this goal, the DOE has replaced 91 of the lowest-performing schools with better options and opened 474 new schools over the past eight years. Of the 474, 365 are traditional public schools and 109 are public charter schools. As a result, the DOE has created more high-quality options for students and families. In some cases, the phased-out schools have been large, traditional high schools, replaced by smaller, more student-centered schools. In all of these cases, the Department believes these smaller schools:

- offer a strong culture where the students are the focus;
- are driven by student achievement and teacher empowerment; and
- provide an environment in which every student is known by the adults in their school.

In other cases, the struggling school has been phased-out and replaced by a single new school. Overall, the vast majority of new high schools have unscreened admissions policies and are serving students with disabilities and English Language Learners at higher rates than schools citywide.

With regard to comments 18 and 22, which indicate that the school's Progress Report grade should not be considered because of the high number of high-needs students served by the school: the DOE progress reports account for and reflect the number of students with disabilities and English Language Learners served by particular school.

With regard to comment 23 and the resources provided to new schools: Small schools are funded in the same manner as our other schools – funding follows a student and is based on student need (ELL, Special Education, below standards, etc). While it is true that new schools receive start up funding, the start-up funding they receive is an average of \$30,000 per year over the first five years for an elementary or middle school and \$34,000 for a high school. Neither of these amounts is large enough to even cover the salary of a first year teacher. In short, this amount of money would not be able to support the significant interventions that would be needed to rapidly turn around the Beach Channel organization under its current structure.

With regard to comment 24 on the importance of a school's history in the community: while every school's history and traditions within a particular community are significant, it is the school organization's current academic performance that must take precedence when making decisions about how to best serve current and future students.

With regard to comment 26 that the decision to phase out the school has already been made: no phase out decisions are final until the PEP votes on the proposal. In previous years, proposals for significant changes in utilization – including phase-out – have been altered in response to community consultation and feedback.

With regard to comments 28 and 31, Beach Channel's graduation rate did improve

slightly, but it still remains in the low 50% range—way below the citywide average. Moreover, there has also been a decline in the 6-year graduation rate. These mixed results do not mitigate the need to for a significant intervention in this school in an effort to make much more significant gains. The DOE recognizes that a lot of effort has been contributed toward improving the school, but the school has not turned around. It is clear to us that some students have had positive experiences and that there are strong student/teacher relationships in some of our most struggling schools. However, we must ultimately make a decision around the academic rigor of a school and whether or not it has the capacity to support its students. It is our belief that Beach Channel does not have the capacity to turn around quickly to meet the needs of its students.

In response to comment 29, Beach Channel enrolled approximately 260 new ninth-grade students in 2009. In addition, 59% of the incoming class was admitted via the High School Application Process.

In response to comment 32 which questions whether the DOE will support Beach Channel and the new schools phasing into the building, the DOE is committed to providing to necessary supports for all schools as they phase out. In addition to the supports mentioned earlier in this document, the DOE will build on past efforts to help the school by:

- Providing teacher training around issues including curriculum planning, improving teaching practices, and tailoring instruction to individual student needs.
- Fostering opportunities for teachers and administrators to connect with colleagues in other more successful schools, allowing them to learn from one another, improve teaching, and better support students.
- Facilitating partnerships with community-based organizations to support youth development initiatives at the school.

All schools receive support and assistance from their superintendent and Children First Network team, a group of educators who work directly with schools. This team helps schools identify best practices, target strategies for specific students in need of extra help, and prioritize competing demands on resources and time. Each school community chooses the network whose support best meets its needs, and each network works to improve student achievement in all of its schools. Beach Channel as well as the new schools will receive support from their Children First Networks

With regard to question number 33 about DOE support for Beach Channel vs. support for the new schools, at the hearing Shael Suransky clarified that between 2002 and 2010, there has been a 43% increase in public funding of DOE schools. He also clarified the Fair Student Funding formula and explained how resources follow student need, both at existing school and a new school. Finally, he explained that the small school campus model is focused on the idea that a smaller group of teachers can form a common educational vision and collaboratively execute that vision through an intense focus on their students.

With regard to question 34, school principals have discretion over the hiring of other supervisory staff. Any excessing of supervisory staff must be in accordance with the relevant collective bargaining agreement.

With regard to question number 37 on building utilization, at the hearing Paymon Rouhanifard explained that gap in current utilization of 57% compared to expected 51% utilization when the new schools are phased in is due to the large number of current hold-over students at Beach Channel. The expectation is that these students, who are currently registered at Beach Channel, will graduate and the new schools that are fully phased in will not carry this same number of hold-over students and will be smaller by comparison. Rouhanifard also clarified that the DOE will open up an additional school in 2012, should there be sufficient student demand and this 4th school would provide other options to students on the peninsula and would more efficiently utilize the current space.

With regard to question number 38, at the hearing Paymon Rouhanifard explained that “limited unscreened” admissions meant that students who demonstrate interest in the school by attending a school’s information session or Open House events or by visiting the school’s exhibit at any one of the High School Fairs receive priority. Students must sign in at one of these events to be granted priority admission to the school’s program.

With regard to question 41 about the participation of D27 CEC and DLT, at the hearing Paymon Rouhanifard clarified that the CEC agreed to this meeting date and was invited to participate. In fact, a CEC 27 representative was present at the hearing but arrived late. DLTs are not required to be part of the scheduling of the public hearing, but they were invited to attend.

In response to comment 42, which questions the DOE’s utilization rates and progress report methodology: detailed information about the capacity, enrollment and utilization of every building is available in the Blue Book and guides decision-making about proposed co-location. In addition, The Office of Space planning conducts a building walk through and space survey to determine that there is sufficient capacity and they layout supports the proposed co-location.

As described in more detail in the Enrollment, Capacity, Utilization Report, which is available at http://source.nycsca.org/pdf/capitalplan/2009-10/BB_2009_2010.pdf, a building’s target utilization rate is calculated by dividing the aggregated enrollment of all the school organizations in the building by the aggregated “target capacities” of those organizations. Each school organization’s “target capacity” is calculated based upon the scheduled use of individual rooms as reported by principals during an annual facilities survey, the DOE’s standards for maximum classroom capacities (which are lower than the UFT contractual class sizes and differ depending on grade level), and the efficiency with which classrooms are programmed (i.e., the frequency with which classes are scheduled in a given classroom).

The most recent year for which target capacity has been calculated for buildings is 2009-2010. As described earlier in this EIS, the DOE’s projected utilization rates for the 2010-

2011 school year and beyond are based on the 2009-2010 target capacity, which assumes that the components underlying that target capacity (scheduled use of classrooms, maximum classroom capacity, etc.) remain constant. Thus, projected utilization rates for 2010-2011 and beyond provide only an approximation of a building's usage because each of the factors underlying target capacity may be adjusted by principals from year to year to better accommodate students' needs. For example, changing the use of a room from an administrative room to a homeroom at the high school level will increase a building's overall target capacity because for high schools administrative rooms are not assigned a capacity. Holding enrollment constant, this change would result in a lower utilization rate. Similarly, if a room previously used as a kindergarten classroom is subsequently used as fifth grade classroom, the building's target capacity would increase because we expect that a fifth grade class will have more students than a kindergarten class. This is reflected in the fact that the DOE's standard for maximum classroom capacity is higher for fifth grade classrooms than for kindergarten classrooms. In this example, as well, assuming enrollment is constant, the utilization rate would decrease.

Progress Report Grade: This letter grade (A through F) provides an overall assessment of the school's contribution to student learning in three main areas of measurement: (I) School Environment, (II) Student Performance, and (III) Student Progress. Schools also receive letter grades in each of these three categories. Schools receive additional recognition for Exemplary Student Outcomes by students most in need of attention and improvement. The overall Progress Report Grade is designed to reflect each school's contribution to student academic progress, no matter where each child begins his or her journey to proficiency and beyond. Schools are compared to all schools Citywide and to schools with student populations most like their own.

The school administration was presented with all of the data underlying the calculation of all Progress Report measures – including graduates' diploma type – during the Progress Report verification period in October 2010, and had ample opportunity to review and update that data. The Graduation Rate and Regents diploma rate reflects that post-verification data.

With respect to comment 47, the central goal of the Children First reforms is to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school – led by a dedicated leader with a vision for student success. To ensure that as many students as possible have access to the best possible education, since 2003 New York City has replaced 91 of our lowest-performing schools with better options and opened 474 new schools: 365 district schools and 109 public charter schools. As a result, we've created more high-quality choices for families.

Based on feedback from communities in 2009 and 2010, the DOE made improvements to its timeline and process for communicating with schools and families early and often throughout the investigation and decision making process. This year, we talked to school leadership, parents, SLTs, CECs, elected officials, and local CBOs about our ideas about how to improve struggling schools. We convened these meetings to discuss our proposals and to hear feedback and new ideas.

The Department developed and distributed “Fact Sheets” for each school we talked with. These fact sheets described proposals, the rationale behind them, included relevant data, and provided clear instructions for how to offer feedback. They were posted on our website and distributed at meetings.

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

In January, Joint Public Hearings were held for all proposals and public feedback was collected at these meetings and through dedicated email and phone numbers. The Department’s analysis of public comment is contained in this document.

Changes Made to the Proposal

No changes have been made to this proposal as a result of public comment.