



Amended Public Comment Analysis

Date: March 22, 2011

Topic: The Proposed Phase-out of I.S. 231 Magnetech 2000 (29Q231)

Date of Panel Vote: March 23rd, 2011

This amended Public Comment Analysis is being further amended to include additional comments received at the hearing held on March 15, 2011.

Summary of Proposal

I.S. 231 Magnetech 2000 (29Q231, “I.S. 231”) is an existing zoned middle school located at 145-00 Springfield Boulevard, Springfield Gardens, NY 11413, in Community School District 29, in Building Q231 (“Q231”). It currently serves students in grades six through eight. An Alternative Learning Center (Q987, “ALC”) is also located at Q231. The New York City Department of Education (“DOE”) is proposing to phase out and eventually close I.S. 231 based on its poor performance and the DOE’s assessment that the school lacks capacity to turn around quickly to better support student needs.

If this phase-out proposal is approved, I.S. 231 would no longer admit sixth-grade students after the conclusion of the 2010-2011 school year. Current students in grades six and seven will continue to be served by I.S. 231 and be supported as they progress toward completion of middle school. Current students in grade eight will be supported in using the High School Admissions Process to select a high school as anticipated. The school will serve one grade less each subsequent year until it completes phasing out in June 2013. In 2011-2012 students in grade six would be served in one of the new zoned middle schools proposed to be opened in Q231, as described in more detail below and proposed in a separate Educational Impact Statement (“EIS”) posted on December 17, 2010 and amended on January 25th, 2011. Current fifth graders zoned to I.S. 231 would be accepted to sixth grade based on a campus choice model: all students currently zoned to I.S. 231 would be zoned to the Q231 campus and would be guaranteed a seat in one of the two new schools proposed. These students would use a middle school choice model to apply to the proposed new schools.

In 2009-2010, Q231 had a target capacity to serve 1,226 students. I.S. 231 had a target capacity to serve 1,134 students and enrolled 931 students, yielding a target organizational utilization of 82%, which does not include the ALC. This means that the building was slightly “underutilized” and had extra space to accommodate additional students.

As noted above, in a separate EIS, the DOE has also proposed the siting of two new unscreened, zoned middle schools in Q231, I.S. 355 (29Q355, "I.S. 355") and I.S. 356 (29Q356, "I.S. 356"), which will both serve grades six through eight when fully phased in.

Copies of the original and amended EIS for both the phase-out and co-location proposals are available in the main office of I.S. 231 and at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Mar232011Proposals.htm>.

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 six written comments in support of I.S. 231, explaining that it should remain open because the commenters believe it is a good school.

Summary of Comments Received at the Public Hearings

A joint public hearing regarding this proposal was held at I.S. 231 Magnetech 2000 on January 26, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 195 members of the public attended the hearing, 25 people offered comments on the proposal and 16 questions were submitted. Present at the meeting were I.S. 231 School Leadership Team members Desmond Poyser and Joanne Bouillion Middleton; CEC 29 members Herman Bagley and Bill Perkins; Deputy Chancellor Shael Suransky; District 29 Superintendent Lenon Murray; Anthony Conelli of the Division of School Support and Instruction; CCHS representative Monica Ayuso; Donovan Richards representing Councilman Sanders and Ernest Flowers representing Assemblyman William Scarborough.

An additional public hearing regarding this proposal was held at I.S. 231 on February 28, 2011. Approximately 44 members of the public attended the hearing, 17 people offered comments on the proposal and 1 question was submitted. Present at the meeting were I.S. 231 School Leadership Team members Desmond Poyser and Joanne Bouillion Middleton; Deputy Chancellor Marc Sternberg; District 29 Superintendent Lenon Murray; Melissa Harris of the Office of Family Information and Action; Cluster Leader Debra Maldonado; and Network Leader Mae Fong. CEC 29 was invited to attend the hearing but no CEC 29 representatives attended.

A second additional public hearing regarding this proposal was held at I.S. 231 on March 15, 2011. Approximately 40 members of the public attended the hearing, 12 people offered comments on the proposal and 15 questions were asked or submitted to the panelists. Present at the meeting were I.S. 231 Principal Emmanuel Lubin; Deputy Chancellor Marc Sternberg; District 29 Superintendent Lenon Murray; Melissa Harris of the Office of Family Information and Action; Francisco Baez representing Cluster Leader Debra Maldonado; and Annette Kunin representing the CFN. The I.S. 231 SLT and CEC 29 were both invited to the hearing and at least one member from each organization had indicated that they were available to attend, but no SLT members (besides Principal Lubin) or CEC 29 representatives attended the hearing.

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

1. Herman Bagley, member of CEC 29, read a statement on behalf of the CEC expressing support for I.S. 231 and disappointment that I.S. 231 had been proposed for phase-out. He cited the New York State Education Department's reconfiguration of scores and said that all schools should be given another year to prove themselves. He expressed support for the students, teachers and staff at I.S. 231. He noted that the CEC tried to dissuade the DOE from having the hearing due to the weather.
2. Desmond Poyser, Academic Coordinator for the Carson Academy and SLT Chairman, made a statement in support of I.S. 231. He said that I.S. 231 is a school on the rise and spoke to the administration's efforts over the summer to improve the school. He asked for time for the changes made at I.S. 231 to mature.
3. During the February 28th hearing, Desmond Poyser elaborated on his support for I.S. 231 by presenting a film about the school. Mr. Poyser noted I.S. 231's performance in mathematics and reiterated that the school is on the rise. He said that because I.S. 231 was not on any state or federal lists, it did not receive Race to the Top funding. He once again asked that I.S. 231 be granted more time to demonstrate improvement as a result of the changes made last summer.
4. Joanne Middleton, president of the PTA, said I.S. 231 had not been provided adequate funding to support its students, and she said more funding is needed to improve the school.
5. Donovan Richards spoke on behalf of Councilman Sanders. Mr. Richards spoke of the need to support and reward teachers and his confidence that I.S. 231 was ready for change. He said that community involvement was necessary in every choice made with regard to I.S. 231's future. Mr. Richards said that I.S. 231 needs more funding and other resources to improve. He encouraged the I.S. 231 community to be proactively involved with the school and he advocated a "facelift" for the I.S. 231 building.
6. Ernest Flowers spoke on behalf of Assemblyman Scarborough. Mr. Flowers spoke of his pride in I.S. 231's students, faculty, staff and community and his intention to continue advocating for I.S. 231.
7. William McDonald, member of CEC 29, stated that schools and students haven't failed, but have been let down by the entities entrusted to support them. He said that conversations with I.S. 231 around school improvement should have begun much earlier. He said the community has been asking for more resources and support for years. He said communities "on the other side of the Grand Central Parkway" were included in the decision-making process and provided with proper supports and resources.
8. At the February 28th hearing, Jackie Wolfson, representing Community Board 13, said the community board opposes the phase-out of I.S. 231. She asked how the DOE evaluates schools slated for phase-out and said that part of the evaluation process ought to include consultation with the principal and the school community. She knows there are other elected officials who are opposed to the phase-out and she asked the panel how they would feel if their children were to be impacted by the proposal.

9. One commenter stated that I.S. 231 is being sacrificed for the failures of the DOE. He stated that it is the DOE's responsibility to fix schools rather than close them. He questioned the lack of support and resources provided to I.S. 231 as its enrollment has increased and noted that the school was rated "proficient" in its most recent Quality Review. He noted recent initiatives to improve the school's performance, and he asked that the DOE be held accountable for low-performing schools.
10. Two commenters said the DOE's proposal feels like a one-sided proposal that does not take into account community feedback.
11. Multiple commenters said I.S. 231 needs to be given more time for new initiatives to go into effect and improve the school.
12. One commenter voiced his opposition to the phase-out of I.S. 231 and questioned the strategy of replacing large schools with multiple, smaller schools. He said the DOE has consistently sent high needs students to schools which it then proceeded to phase out. He advocated increasing resources and supports for struggling schools rather than phasing them out.
13. One commenter took issue with the DOE's literature around the I.S. 231 phase-out proposal, saying there were more detailed figures around the percentage of failing students than there were details around the supports provided to those students. She questioned whether the replacement schools showed more promise of success than I.S. 231 and voiced concern that her child would be stigmatized for having gone to I.S. 231.
14. Multiple commenters advocated providing I.S. 231 with more funding rather than replacing it with new schools. One commenter suggested that new school funds should be used to support the current school instead of creating the new schools.
15. One commenter spoke of the high quality education his sons received in New York City public schools years before, asking what had happened to the DOE that it had to phase out under-performing schools. He questioned how I.S. 231 was allowed to decline to the point where phase-out was the last remaining option. He also questioned whether anyone is in a position to provide oversight for the DOE. He said phase-out hearings only happen in black and Hispanic communities and cited that as evidence of racism in the DOE.
16. One commenter noted that I.S. 231 was a "school of last opportunity" that welcomed students who had been kicked out of other schools or were failing in their previous schools. He said this is the reason I.S. 231 has been labeled a failing school. He noted Principal Lubin's ability to draw talented teachers to I.S. 231 and spoke of the principal's efforts to break down the school into smaller academies similar to what has been proposed by the DOE. He said I.S. 231 needed more time for those efforts to bear fruit.
17. One commenter who graduated from I.S. 231 said that it was a model of excellence when she was there and questioned the cause of its decline. She said that the EIS included substantial information about supports provided to the faculty and staff but little information about supports provided to students. She cited the DOE's concern that I.S. 231 lacks the ability to turn around quickly and asked how the DOE defines quickly.

18. Multiple commenters voiced concern about the provision of adequate supports for students currently in the 6th and 7th grades who would remain at I.S. 231 as it phases out.
19. Multiple commenters voiced concern that I.S. 231 would have an experience similar to Jamaica High School after it was proposed for phase-out.
20. One commenter encouraged the community to be vocal in its opposition to I.S. 231's phase-out, noting the success of the lawsuit against the DOE that prevented schools from being phased out in 2010.
21. One commenter critiqued the format of the hearing, saying that the DOE is doing only what is legally mandated as a result of the lawsuits that prevented phase-outs in 2010. He said the DOE has no plans for the schools and is trying to incite divisions among communities. He asked who would hold accountable the administrators at the DOE who allowed schools decline to the point where phasing out was the last remaining option.
22. One commenter noted that the teachers at I.S. 231 had not given up on the school and detailed the work they have put into improving the school since this past summer.
23. Multiple students made comments in support of I.S. 231, asking the DOE not to proceed with its proposal to phase out the school.
24. Multiple commenters spoke of the negative impact on children who attend schools labeled as failing.
25. Multiple questions were submitted asking whether the Chancellor or other DOE staff had visited the school previously; and if not, why they had not been there to help. An invitation was extended for the Chancellor to visit.
26. One commenter refuted the previous supports to the school as described in the EIS and stated that no help has been provided to any of the 25 schools proposed for phase-out.
27. One commenter asked why the community should believe that their input matters since no school closing decision has been changed as a result of community feedback.
28. One commenter asked what supports were implemented to improve the school before this proposal was made.
29. One commenter stated that they understood that students in the school were not prepared for junior high, and wanted to know what the solution was for future students.
30. A commenter asked when the DOE would announce the new location for the ALC in the building and which organization it would be co-located with.
31. One commenter asked why students who don't make Level 3 and 4 would be pushed out of the school.
32. One commenter asked why I.S. 231 was selected for phase-out.
33. One commenter cited that the school currently shares facilities with the neighboring elementary school and asked how the DOE planned for four schools to share facilities starting in September.
34. At the February 28th hearing, one commenter asked for an elaboration on which structures weren't working at I.S. 231.
35. At the February 28th hearing, one commenter asked whom from the community the DOE consulted with regard to scheduling the additional February 28th hearing.

36. Multiple commenters stated that other middle schools take the students with 3s and 4s leaving I.S. 231 with the struggling students with 1s and 2s. The commenter asked why I.S. 231 isn't being given the opportunity to improve since it has these struggling students, and she said that after I.S. 231 closes, another school will end up with those same struggling students and it will be phased out a few years later.
37. At the February 28th hearing, several commenters questioned whether the February 28th meeting would be official without representation from the District 29 CEC.
38. On February 28th, one commenter noted that parents were notified of the hearing on the Friday afternoon before the winter holiday. The commenter said meetings should be held at different times of day so more people could attend and they should be advertised on radio and television. The commenter said that the I.S. 231 community loves their school and the turnout is not indicative of how the community feels.
39. On February 28, one commenter stated that the DOE is going to ignore the students who are already enrolled in I.S. 231 and are trying to distract the community from seeing that. The commenter claimed that turnout for the hearing was low because people don't believe they are being heard.
40. On February 28, one commenter noted that the DOE was the only school in District 29 to have been awarded 7 grants. He noted the school's new literacy programs and effective teacher collaboration team. He also noted the school's award-winning chapter of the FBLA and a partnership with the City Council. He also noted that the school is filled to capacity and has 12 classes that are oversized.
41. On February 28, one commenter said that the primary difference between I.S. 231 and the other schools being phased out is that, by dividing itself into two smaller academies, I.S. 231 has already implemented the strategy that underpins the DOE's plan to replace I.S. 231 with two new schools. One commenter said he does not recall having seen anyone from the DOE come through the I.S. 231 building since the public hearings began.
42. At the March 15th hearing, one commenter expressed frustration that despite Chancellor's Regulation A-660 which provides that the DOE must provide 10 days notice for public hearings, the DOE did not provide ample notice for the hearings.
43. At the March 15th hearing, one commenter complained that the DOE had never placed programs in schools like I.S. 231 that would prepare students for blue collar jobs.
44. At the March 15th hearing, multiple commenters stated that charter schools do not have to accept students with special needs.
45. At the March 15th hearing, one commenter said that the hearings feel like a dog and pony show.
46. At the March 15th hearing, one commenter noted that all of the members of the Panel for Educational Policy had been invited to visit I.S. 231. The commenter noted that the school appreciated Chancellor Black's recent visit but none of the Panel members had accepted the invitation to visit the school. The speaker also asked how the DOE can phase out I.S. 231 without seeing results from the state math and literacy tests. The speaker asked why the DOE does not want data to support the proposal. Finally, the speaker stated that the numbers don't support phasing out I.S. 231.

47. At the March 15th hearing, one commenter noted a concern about students eating lunch at 10:30am and asked that the DOE allow I.S. 231's network to help the school and provide them with feedback on how to improve their performance.
48. At the March 15th hearing, one commenter asked whether students currently enrolled in the 6th and 7th grade in I.S. 231 would have the right to apply to the two new schools.
49. At the March 15th hearing, one commenter asked why students would have to remain in a failing school.
50. At the March 15th hearing, one commenter asked how the DOE would respond if I.S. 231 were to improve its test scores.
51. At the March 15th hearing, one commenter noted that I.S. 231 is not on the State's list of Persistently Low Achieving schools and asked why the DOE would come to a different conclusion than the State.

The DOE received comments at the Public Hearings which did not directly relate to the proposal.

52. Multiple commenters, including members of the CEC, expressed frustration with the decision to move forward with the joint public hearing despite the inclement weather. One commenter cited the mayor's declaration of a state of emergency and questioned the wisdom of continuing to hold the hearing. The commenter noted that a marching band of 150 children that had been gathered outside the building had to be sent home because of the weather.
53. Multiple questions were submitted regarding the decision to move forward with the hearing despite weather conditions:
 - a. How much community input was expected as a result;
 - b. If the mayor appoints the Chancellor and her deputies, why can they not postpone the meeting;
 - c. How can the DOE show such disregard for the safety of the community;
54. One question was submitted asking how DOE staff can sleep at night.
55. One commenter stated that Councilman Sanders had arranged for funding for computers and smartboards for District 29 schools, and asked when they would be received and when teachers would be trained to use them.
56. One commenter questioned the DOE's use of Race to the Top funds.
57. One commenter noted that I.S. 231 is having a negative impact on the value of his property and his quality of life and spoke of his support for homeowners and community stakeholders who had not been involved in conversations around I.S. 231's future.
58. One commenter voiced opposition to the absent teacher reserve and the mayor's efforts to reform civil service laws.
59. One commenter said the DOE needed to be audited so that it would stop receiving federal funding.
60. One commenter stated that the mayor runs the school system like a business, but that children are not goods and schools should not be treated as sweatshops.
61. One commenter stated that the school system is ruining children who look like him. He then said that the mayor appoints only people who look like him to run schools

- and that Chancellor Black did not deserve to be granted a waiver. He stated that the DOE should use funds to support existing schools rather than open new schools. He said he hopes the NAACP and the UFT will work together to file a law suit to prevent proposals from being approved.
62. The commenter said the mayor likes to play politics with students' educations in communities where he knows he can get away with it. The commenter went on to say the mayor has done nothing good for education. The commenter encouraged the audience to attend the March 1st PEP meeting but said it would be a puppet show.
 63. One commenter referred to the DOE's reforms as education neglect and said the DOE is trying to crucify the city's children.

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

64. A commenter stated that the reason for the proposed phase-out was to get more money from the federal government, and that this could be achieved by splitting up the grades into different schools within the I.S. 231 organization. The commenter suggested that calling I.S. 231 a failing school was a false pretense and the DOE should be honest with families about finding creative ways to get more funding. The commenter also stated that this was only done in communities where parents do not pay attention or fight back.
65. The DOE received a document from the Tri-Community JHS 231 Parents Association regarding the phase-out and replacement of I.S. 231. Regarding the proposed phase-out, it stated:
 - a. The community feels that school leadership is lacking in vision, direction and sense of urgency and that new leadership is needed. The community would like to be involved in the decision-making process.
 - b. The community feels that a review of administrative support staff is in order.
 - c. Based on recent changes in curriculum and program offerings, the community is requesting that no further changes be made, for continuity and because the new program offerings have worked in the past.
 - d. Based on public perception and concerns about disruption, the community suggests that current program offerings be re-evaluated at the end of the year and if necessary, new structures could be phased in under the same leadership. The community feels that two organizations in the building would be detrimental to the environment and public perception.
66. 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.
67. The DOE received a comment from a local resident who has lived in the vicinity of I.S. 231 for 20 years. The commenter expressed support for the phase-out proposal, noting that she had witnessed the decline of I.S. 231 over the past several years in particular. The commenter cited concerns around the deterioration of safety in the neighborhood which has paralleled the decline of I.S. 231's student performance.

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

With regard to comment 1, the DOE accounted for changes in cut scores when making decisions to propose to phase-out schools. All schools are judged against a peer group, all of which experienced the same drop in cut scores.

With respect to the portions of comments 2, 5, 9, 11, 16, 17 and 65(d) stating that I.S. 231 requires more time to demonstrate improvement, the DOE has judged that I.S. 231 is not capable of turning around quickly due to the school's continual decline in its learning growth rate over the past three years. Even if this trend were to reverse and learning growth rates increased substantially, several more cohorts of students would pass through IS 231 before the school would see real improvement. The DOE believes that incoming students would be served much better by two new schools than by I.S. 231 as it attempts to reverse its downward trend in student achievement and learning growth.

With regard to the portion of comments 2, 3 and 9 stating I.S. 231 is on the rise, the DOE looked carefully at the school's performance outcomes. Neither student performance and learning growth data nor progress report scores indicate that I.S. 231 is on an upward trend. More detailed information about I.S. 231's performance over time can be found in the "Performance and School Environment at I.S. 231" section of the EIS for this proposal.

With respect to the portion of comment 3 regarding Race to the Top grants, each year, the New York State Education Department assigns an accountability status to each school in the state pursuant to the mandate of the federal No Child Left Behind Act. I.S. 231's current State accountability status is "In Good Standing." Because of this status, I.S. 231 is ineligible for any State improvement funding, including funding through the Race to the Top program.

With regard to comment 4, 5, 7, 9, 12, and 14 regarding the funding and resources provided to of I.S. 231, the DOE provides all schools, including I.S. 231, funding on a per-pupil basis. In an effort to turn I.S. 231 around, the DOE has provided the school with numerous additional supports in the areas of school leadership, instruction, and operations. Given the extent of these investments and the negligible improvements that resulted, the DOE does not believe that extra funding or resources are the appropriate approach to dramatically improving the school.

With respect to comments 5 and 8 concerning community involvement, the DOE has worked to involve the community throughout this process, including holding meetings in the fall at the school with the Principal, SLT, and parents. As mentioned in the Analysis of Public Comment for the proposal to replace I.S. 231 with two new middle schools, the DOE has sought feedback from the community regarding what it would like to see in the new schools. Finally, with regard to comment 5's suggestion that I.S. 231 be provided a "facelift," the School Construction Authority makes capital improvements to school buildings throughout the city and prioritizes projects based on need.

With respect to comment 7, the DOE began the investigation process of I.S. 231 as soon as the most recent Progress Report figures were available, and began conversations with the school

explaining that it was under investigation shortly thereafter. Finally, the DOE engaged in this same process for all schools investigated for poor performance, regardless of geography.

With respect to comments 8 and 32, I.S. 231 was selected for phase-out based on several factors, including but not limited to its continued low academic outcomes for student proficiency and progress. For more information on this decision making process, please see the EIS.

With respect to comment 9, the DOE believes that I.S. 231 does not have the capability to turn around quickly. The commenter indicates that the enrollment at I.S. 231 has increased; this is not true; in fact the enrollment has decreased in recent years. I.S. 231 has continued to be supported by its Children First Network and has been funded according to the per-pupil formula. I.S. 231 was rated Proficient on its most recent Quality Review, but the Quality Review is just one of many factors taken into account as we determine whether a school ought to be phased out. No single factor in itself provides an accurate portrait of any school's performance, and the DOE believes that, taken altogether, the factors around I.S. 231 indicate that the school's phase-out and replacement with two new schools represents the best path forward for students and families in District 29. Finally, with respect to this comment and comments 15 and 21 concerning holding the DOE accountable for low-performing schools, the DOE believes it is holding itself accountable by replacing I.S. 231 with two high quality new schools.

With respect to comments 10, 27 and 39 concerning the DOE's consideration of community feedback, the DOE does take community input into account, though this does not always change the DOE's final decision, as was the case with the proposal to phase-out I.S. 231. However, the DOE used the community input concerning the proposed phase out of I.S. 231 to plan the two proposed replacement schools, as explained in the Analysis of Public Comment of the replacement proposal.

With respect to comment 12 regarding the rationale for replacing low-performing larger schools with smaller schools, the DOE believes that small schools are structurally better able to provide students a high quality education. Small schools allow more personalized learning environments and individualized instruction for students and greater opportunities for professional development for teachers. Additionally, the DOE compares schools to peer schools according to their student populations. With respect to I.S. 231, there are schools with similar populations of high needs students that are achieving significantly better results. Only those schools in each peer group consistently showing low performance have been proposed for phase-out.

With respect to comments 13 and 24, the DOE ensures students will not be stigmatized for having attended a phase out school by running and administering the High Schools Application Process centrally. No high school has a screening process which selects or denies students based on the middle school that they attended.

With respect to the portions of comments 13, 17 and 28 concerning the supports provided to I.S. 231 students and staff, the Educational Impact Statement provides that the following supports were implemented:

- Helping the school implement Reach for Tomorrow, which includes a computer program that allows students to work independently on math skills.

- Working with the school to secure student incentives for improved attendance; incentives included flights in single-engine planes with the Young Eagles at Calabro Airport, the opportunity to participate in a DNA extraction at the Brookhaven Laboratory and the chance for a free summer program at the University of California-San Diego.
- Supporting enrichment partnerships with the Lincoln Center Theatre, Manhattan Chamber of Dance, Flushing Arts Council, Center for Culture, Studio in a School, Classroom Inc. Chelsea Bank Program and Urban Advantage.

Any supports provided to teacher and administrators are intended to positively impact the educational experience of the students of I.S. 231.

With respect to comment 14, new schools funds are minimal—the annual support of \$30,000 is less than a first-year teacher’s salary. The DOE does not believe that this sum, if provided over the 3 years new schools receive it, would be a significant means of turning I.S. 231 around.

With respect to comment 15 regarding the rationale for phasing out schools, the DOE proposes to phase-out schools based on their overall performance, including many factors. While schools are judged against peer groups which account for student demographics, decisions to propose phase-out are made without regard to the race or ethnicity of the students in the schools. Regarding the comment about the decline of the school over a number of years, the DOE has continuously made efforts to support the school through its Children First Network each year.

With respect to comment 16 which implies that I.S. 231 has been labeled failing because of its admissions policy, the DOE believes strongly in unscreened schools, like I.S. 231, which accept all students, but also believes that these students should be held to the same high standards as other students. The Progress Report formula places more weight on student progress than it does on student performance. This ensures that schools which accept students on an unscreened basis are judged more by how much they help those students grow than on the absolute level of proficiency of those students.

With respect to the portion of comment 17 concerning how the DOE defines a schools ability to turn around “quickly,” the DOE does not quantify the amount of time required to turn a school around “quickly.” I.S. 231 has demonstrated a three-year trend of stagnant academic progress and the DOE has not seen or heard any evidence that the school is capable of reversing this trend given its existing systems and structures. The DOE believes that phasing out I.S. 231 and phasing in two new district middle schools will be the fastest way to improve educational opportunities for the students and families of this community.

With respect to comments 18, 24, 29, 36 and 39 concerning students currently enrolled at I.S. 231, current I.S. 231 students in sixth and seventh grades would continue to be supported by the school’s Children First Network. In past cases, measures of student performance (e.g. graduation rates) tend to improve as schools phase out, suggesting the support of the school as it phases out has been helpful.

With respect to comment 19, this question is too vague for the DOE to provide a response.

With respect to comment 21, Joint Public Hearings are part of the legally mandated process for the DOE to implement significant changes to school utilization. The process is set forth in Chancellor's Regulation A-190. Joint Public Hearings were also held in 2010, prior to the lawsuit the commenter mentioned. This year, in addition to holding Joint Public Hearings, the DOE has held several additional meetings with communities with schools proposed for phase-out. The DOE has carefully prepared plans for the replacement of I.S. 231, as mentioned in the EIS and Analysis of Public Comment for that proposal. The DOE also held two additional hearings and postponed the scheduled vote on the I.S. 231 proposal in order to allow more time for the I.S. 231 community to provide feedback on the proposal.

With respect to comment 25, Chancellor Black visited I.S. 231 on Monday, March 7th. The chancellor visited classrooms, spoke with teachers and met with I.S. 231's principal. With respect to comments 26, 28 and 41, other DOE staff, including the District 29 Superintendent and the school's Children First Network Leader and other Network support staff have been to the school on multiple occasions to observe and provide support. A detailed description of these supports is included in the EIS and earlier in this document.

With respect to comment 30, the DOE has announced that it is moving the ALC into Building Q883 in District 28 for the 2012-2013 school years, which is the first year when that building will be available for a new occupant. The ALC will not be co-located with any other school once it moves to this building.

With respect to comment 31, no students, especially those performing at levels 1 and 2, will be "pushed out of the school." I.S. 231 will continue to educate all students currently in sixth and seventh grade over the next two years, and the two new schools will educate all students entering the school as sixth graders next year and in all future years, regardless of their proficiency levels.

With respect to comment 33, I.S. 231 and P.S. 251 are not co-located. While the buildings are connected, the two schools and buildings do not share any spaces. Regarding I.S. 231 and the two proposed new schools, the Borough Director of Space Planning for Queens has determined that all four schools can fit within the larger tandem building; specifically, I.S. 231 and the two new schools will be co-located in the Q231 portion of the building. As with all co-located schools, I.S. 231, I.S. 355 and I.S. 356 will all have representatives on the Building Council, including all principals, UFT representatives, and parents from each school. The Building Council meets monthly to update plans for the shared spaces and find shared solutions to any concerns. If necessary, the Borough Director of Space Planning is available to assist in these meetings.

With regard to comment 34, the DOE believes that the large school structure cannot serve the I.S. 231 community as well as the two proposed smaller schools. Even though I.S. 231 has developed two academies, it still functions as a single school organization. The DOE believes that two smaller school organizations would be able to respond to student needs more nimbly and quickly than a single large school organization. The DOE's decision to phase out I.S. 231 is based on other factors, like performance and culture, in addition to the school's structure. I.S. 231's performance has been declining for several years and students have reported that they are unaware of what they need to learn next, preventing them from taking ownership over their

education. More detailed information about I.S. 231's performance and school culture can be found in the "Performance and School Environment at I.S. 231" section of the EIS for this proposal.

With respect to comments 35 and 38 regarding the timing and planning of the February 28th hearing, the DOE believes that adequate notice was provided to the I.S. 231 community. This proposal was initially scheduled to be voted on at the February 1st PEP meeting. In response to community feedback indicating that the official public hearing was cut short because of inclement weather, the DOE delayed the vote in order to provide the community with additional time to comment on the proposal. Based upon communications with the CEC and SLT, the DOE offered as a courtesy to hold an additional hearing on February 28th. The SLT and PTA confirmed that this would work for the community and they participated in the hearing. The DOE worked with the school to provide notice to all families consistent with the procedures contained in Chancellor's Regulation A-190. The CEC was included in all relevant communications and but did not attend the hearing. All hearings are held in the early evening in order to allow the greatest number of community members to attend.

With respect to comment 36 regarding the difficulty of serving students with 1s and 2s, I.S. 231's performance is measured against a peer group of schools that serve similar populations, including schools with high numbers of students performing at levels 1 and 2. Many of these schools performed better than I.S. 231 in both student performance and student progress (learning growth). However, I.S. 231's peer index value of 2.55 places it near the boundary of the first and second quartile of the citywide peer index, indicating that I.S. 231 does not have a substantially greater number of 1s and 2s than other schools in the city.

With respect to comment 37, the official joint public hearing for this proposal was held on January 26th, 2011, pursuant to Chancellor's Regulation A-190. The additional hearing on February 28th was held as a courtesy to provide community members with another opportunity to comment on the proposal. The hearing was scheduled in consultation with the District 29 CEC, but it was not an official joint public hearing and, therefore, did not require participation by a member of the CEC.

With respect to comment 41, the DOE recognizes that I.S. 231 has a committed staff that has worked hard to support its students, including the development of two academies within the school that were launched at the beginning of the 2010-2011 school year. These academies attempt to imitate the structure of smaller schools in some ways, but I.S. 231 is still effectively administered and structured as a single, large school. The DOE believes that smaller schools are better poised to support students. Moreover, I.S. 231 has been performing poorly for years despite support and assistance provided by the DOE, and we do not believe it has the capability to change course quickly. The DOE believes that the I.S. 231 community cannot wait several years to see whether the academy structure will result in improved performance. Accordingly, the DOE believes phasing out the school is the best way to immediately improve the quality of education provided to the community.

With respect to comment 42, joint public hearings for significant changes in school utilization are governed by Chancellor's Regulation A-190 rather than Chancellor's Regulation A-660,

which governs parent association meetings. Chancellor's Regulation A-190 does not specify the number of days notice that must be provided prior to a hearing. Nonetheless, for all three hearings, the DOE coordinated closely with I.S. 231 to notify the community of hearing dates as soon as those dates were confirmed. This included backpacking notices home and, in the case of the March 15th hearing, calling families to notify them of the new hearing.

With respect to comment 43 regarding the lack of career and technical education programs at I.S. 231, the DOE offers 330 Career and Technical Education (CTE) programs at 120 high schools across the city. These programs are intended to provide students with the tools necessary to begin a technical career directly upon graduation from high school. CTE programs are not offered at the middle school level because students cannot begin a technical career without graduating from high school.

With respect to comment 44, charter schools are mandated to enroll all students accepted via the lottery admission system, regardless of the students' needs. Charter schools may not deny admission to students based on their needs and are expected to create a program to meet each student's needs. The two new schools proposed to open in Q231 are not charter schools but rather are DOE public middle schools.

With respect to comment 46 regarding I.S. 231's invitation to members of the Panel for Educational Policy to visit I.S. 231, Panel members are unable to visit every school concerned in the proposals they consider. However, Panel members are provided with detailed background information around every proposal, including this document which summarizes and analyzes community feedback concerning the proposal.

With respect to comments 46 and 50, the DOE fully hopes that I.S. 231 state math and literacy test results demonstrate improvement in student achievement. However, given the history of I.S. 231's performance over the last several years, the DOE believes that it is unlikely that I.S. 231 will see marked improvements in its students' test scores. The DOE's conclusions around I.S. 231 are based on many years of data and many factors other than test scores and, given that I.S. 231 was the lowest performing middle school in District 29 in 2009-2010 and has a history of stagnant academic progress over the past three, a single year's testing results would not provide enough evidence of a positive trend to lead the DOE to change its conclusion that I.S. 231 lacks the capacity to turn around quickly.

With respect to comment 47, although Building Q231 would house three school organizations as a result of this proposal, the total number of students served in the building would remain unchanged from the current number served by one school. The principals of the three schools will work together to determine a schedule for the cafeteria that accounts for each school's needs. Additionally, I.S. 231 has already been receiving supports and feedback from its network but the school has been unable to turn around despite the network's involvement. The DOE does not believe that further support and feedback from I.S. 231's network would be enough for the school to turn around quickly.

With respect to comments 48 and 49, current 6th and 7th grade students at I.S. 231 would continue at I.S. 231. The DOE would continue to provide all necessary supports to those

students until they graduate from I.S. 231. In many cases, achievement has increased among students enrolled in schools in the process of being phased out. Students currently enrolled in I.S. 231 would not be able to attend the new schools next year because those schools would only serve sixth graders. However, if a student at I.S. 231 does not meet promotional standards and must repeat a grade no longer offered by I.S. 231 as it phases out, that student would be transferred into one of the new schools phasing into the building.

With respect to comment 51 regarding the discrepancy between the DOE's evaluation of I.S. 231 and its State accountability status, the DOE looks at a number of different factors to reach an evaluation about a school. New York State's list of Persistently Low Achieving (PLA) schools is comprised of the bottom 5% of Title I schools that have the lowest combined performance on the English language arts (ELA) and mathematics tests and that have failed to demonstrate progress on these assessments. In addition to test scores, the DOE considers historical data about performance, progress report grades, student proficiency and growth rates, environmental survey data and the opinions and experiences of community members including teachers, the district superintendent and the school's support staff. Based on this evaluation process and considering the DOE's experience with other schools with similar performance indicators, the DOE believes that the proposal to phase out I.S. 231 and replace it with two new, smaller schools is the best and right decision for future students in the I.S. 231 community.

With regard to comment 55, the school can work with CM Sanders on the materials and training for these technological additions. I.S. 231's Children First Network will also support the school in these efforts.

With respect to comment 66, the central goal of the mayor's 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.

With respect to comment 64, the DOE does not believe that splitting up the grades into schools of only one grade would be an appropriate instructional decision. Further, while the commenter suggested the phase-out proposal is about "finding creative ways to get more funding," the decision to propose the school's phase-out was made based on school performance, not with regard to funding opportunities or anticipated parent response.

With respect to comment 65(a), the DOE sought feedback from the community around the possibility of phase-out in the fall of 2010. The DOE has also sought and continues to seek community feedback regarding the proposal to replace I.S. 231 with two new schools.

With respect to comment 67, safety concerns at I.S. 231 figured into the DOE's decision to move forward with a proposal to phase out I.S. 231. On the 2010 New York City School Survey, 33% of students reported feeling unsafe in the hallways, bathrooms and locker rooms at school.

Parents also reported concerns about their children’s safety at I.S. 231, with 24% indicating that they felt their children were unsafe at school.

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.

Portions or all of comments 2, 6, 20, 22, 23, 40 and 65(c) and (d) voiced general support for I.S. 231 and opposition to the proposal without raising specific issues requiring a response. Again, the DOE recognizes that I.S. 231 staff and families have worked hard to improve the school. The DOE also provided considerable support to I.S. 231, including extensive training for school leaders and teachers, helping the school restructure into small learning communities, and working with the school to secure partnerships with community-based organizations. Unfortunately, these efforts have not turned the school around, the DOE believes that only the most serious intervention—the gradual phase-out and eventual closure of I.S. 231—is the action we must take to best serve students and the community. It will allow for new school options to develop in Building Q231 that will provide the highest quality options to families.

Changes Made to the Proposal

No changes were made to the proposal.