



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of Fordham Leadership Academy for Business and Technology (10X438) and the Opening and Co-Location of New High School (10X577) with West Bronx Academy for the Future (10X243), KAPPA International High School (10X374), Belmont Preparatory High School (10X434), Fordham High School for the Arts (10X437), and Bronx High School for Law and Community Service (10X439) in Building X435 Beginning in 2012-2013

Date of Panel Vote: April 26, 2012

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to close Fordham Leadership Academy for Business and Technology (10X438, “Fordham Leadership”), an existing district high school in building X435, the Theodore Roosevelt Educational Campus (“X435” or “Roosevelt Campus”), located at 500 East Fordham Road, Bronx, NY 10458, within the geographical confines of Community School District 10. Fordham Leadership currently serves students in grades nine through twelve. The DOE is proposing to immediately replace Fordham Leadership with New High School (10X577, “New School”), a new district high school serving students in grades nine through twelve in building X435.

If this proposal is approved, Fordham Leadership will close at the conclusion of the 2011-2012 school year. All current students who have not graduated before the start of the 2012-2013 school year will be guaranteed seats and automatically enrolled in New School.

Fordham Leadership is co-located with West Bronx Academy for the Future (10X243, “West Bronx Academy”), an existing secondary school serving students in grades six through twelve; KAPPA International High School (10X374, “KAPPA International”), an existing high school serving students in grades nine through twelve; Belmont Preparatory High School (10X434, “Belmont Prep”), an existing high school serving students in grades nine through twelve; Fordham High School for the Arts (10X437, “FHSA”), an existing high school serving students in grades nine through twelve; and Bronx High School for Law and Community Service (10X439, “BHSLCS”), an existing high school serving students in grades nine through twelve. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias. In addition, the Roosevelt Campus houses a Living for the Young Family Through Education (“LYFE”) program, and a community-based organization (“CBO”), Good Shepherd Services (“Good Shepherd”), which provides mentoring and support services to one school in the building.

Fordham Leadership admits students through the Citywide High School Admissions Process through the educational option method. West Bronx Academy admits middle school students through the District 9 and 10 Middle School Choice Process through a limited unscreened method; the school admits high school students through the Citywide High School Admissions Process through a limited unscreened method (with priority to continuing eighth-grade students). KAPPA International admits students through the Citywide High School Admissions Process through a limited unscreened method. Belmont Prep admits students through the Citywide High School Admissions Process through a screened method. FHSA offers a Career and Technical Education (“CTE”) program. It admits students through the Citywide High School Admissions Process based on school-based auditions. BHSLCS admits students through the Citywide High School Admissions Process through the educational option method.

The DOE strives to ensure that all students in New York City have access to a high-quality school at every stage of their education. By closing Fordham Leadership and replacing it with New School, the DOE is seeking to expeditiously improve educational quality on the Roosevelt Campus. If this proposal is approved, New School will develop rigorous school-specific competencies to measure and screen prospective staff – including Fordham Leadership staff who apply to work at New School. Based on these criteria, and in accordance with the staffing requirements in Article 18-D of the DOE’s existing contract with the United Federation of Teachers (“UFT”), New School will put in place a process aimed at hiring the best possible staff, thus improving teacher quality and, by extension, improving the quality of learning. New School plans to develop new programs and school supports that are intended to improve student outcomes. Doing this important work to improve the quality of teaching and learning in the school will also maximize New School’s chance of receiving up to \$2,000,000 in supplemental federal funding under the federal School Improvement Grant (“SIG”) program. New School will build on the strongest elements of Fordham Leadership and incorporate new elements, including new talent, designed to better meet student needs. Thus, the immediate closure and replacement of Fordham Leadership with New School should give students access to a higher-quality educational option while they continue to attend school in the same building.

The details of this proposal have been released in an EIS which can be accessed here:
<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/April2012Proposals.htm>.

Copies of the EIS are also available in the main offices of Fordham Leadership Academy for Business and Technology, West Bronx Academy, KAPPA, Belmont Prep, FHSA, and BHCSLCS.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building X435 on March 30, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 63 members of the public attended the hearing, and 10 people spoke. Present at the meeting were Deputy Chancellor Marc Sternberg; Community Education Council (“CEC”) 10 President Marvin Shelton; Fordham Leadership School Leadership Team (“SLT”) Representatives Novelette Foote, Judy Clemetson, Marisol Acosta, Wilfredo Gonzalez, and Donna Anglin; FHSA SLT Representatives Iris Blige and Michael Johnson; BHSLCS SLT Representative Michael Baraket; and West Bronx Academy SLT Representative Wilper Morales; Belmont Preparatory SLT Representative Marc Pascente. The SLT from KAPPA was invited to the hearing and two members confirmed attendance but did not appear at the hearing.

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

1. Several commenters (including representatives of Fordham Leadership's SLT) voiced general opposition to the proposal.
2. Multiple commenters voiced general opposition to the practice of closing schools.
3. Several commenters (including representatives of Fordham Leadership's SLT) voiced general support for Fordham Leadership as well as the staff, teachers and students.
4. Multiple commenters voiced support for the current principal of Fordham Leadership.
5. Several commenters (including representatives of Fordham Leadership's SLT) noted that many people, including representatives of the DOE, have acknowledged the positive achievements of the school. These commenters asked why the school is being proposed for closure if positive achievements are taking place at the school.
6. Several commenters noted that the previous principal of Fordham Leadership did not manage the school effectively and contributed to the school's challenges. Many commenters also noted that the previous principal had harassment charges filed against him and stated that he should have been removed from the principalship earlier.
7. Multiple commenters stated that the data the DOE cites is not accurate because they reflect the school's performance under the previous administration. These commenters stated that the data collected under the current leadership would show the improvements and positive achievements that are taking place at Fordham Leadership.
8. Several commenters expressed that the school is struggling because the DOE has not provide the needed resources and support for the school and its staff.
9. One commenter noted that the teachers at the school have not been provided with the necessary professional development, mentoring, and training. The commenter stated that the DOE should provide these supports instead of closing the school.
10. Two commenters noted that the school's student population includes a large number of ELL students, special education students and students who are socioeconomically disadvantaged, and these commenters claimed that this poses a challenge for the school's overall performance. These commenters also asked how student demographics are taken into consideration in making the decision to close a school.
11. One commenter stated that the EIS tells the students that their teachers are the problem and this negatively impacts student learning because it causes the students to lose respect for their teachers. Another commenter said that too much blame is being placed on teachers.
12. Multiple commenters noted the negative impact that the school closure will have on students, families, teachers, and the larger community.
13. Several commenters expressed concern about the psychological impact of a school closure on the students currently attending the school.
14. Two commenters expressed concern that the closure will negatively impact the legacy of Fordham Leadership for students who previously graduated from the school as well as the students who are currently enrolled.
15. One commenter stated that when a school is slated for closure or begins a phase-out, the idea of educating students is forgotten and the focus is placed on credit recovery.
16. One commenter stated that once the school starts its phase-out, the amount of after-school programs offered will decline significantly or all programs will be removed.
17. One commenter asked why the DOE implemented the Turnaround model right after implementing the Transformation model.
18. One commenter asked why the DOE is waiting until September to improve the school and place new structures within Fordham Leadership instead of making these changes now.
19. One commenter asked what new structures will be placed into the school.

20. Multiple commenters asked how the staff will be selected for the new school and which current staff will remain at the school.
21. One commenter asked which students will be able to remain enrolled at the school and which students will have to leave the school if this proposal is approved.
22. One commenter asked how the school will close.
23. One commenter stated that recruiting half the staff and getting rid of half of the staff will destabilize the school.
24. One commenter stated that the only thing that would be new about the proposed school is that 50% of the teachers would be new while the other 50% of teachers would be excessed.
25. One commenter stated that there are significant fiscal costs for this plan. He noted that removing 1,800 teachers and hiring substitutes will cost the city approximately 180 million dollars annually.
26. One commenter stated that the DOE does not actually collect feedback at joint public hearings and the commentaries offered at hearings have no impact on the proposals.
27. Multiple commenters expressed the belief that the closure/replacement proposals are a “political move” to oppose the United Federation of Teachers (UFT) and the Council of School Supervisors and Administrators (CSA).
28. Several commenters expressed the belief that the closure/replacement proposals are a means of avoiding reaching an agreement about a teacher evaluations with the UFT and CSA.
29. One commenter stated that the countries that are high-performing in their education systems don't use school closing as a means to improve their schools and asked to see the DOE data that proves this policy is effective.
30. One commenter noted that Turnaround proposals are just a part of the mayor's political agenda and do not do anything to help students.

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

31. One commenter stated his belief that trades should be taught in every school in New York City.
32. One commenter noted that Fordham Leadership used to offer a business enterprise program that helped the students develop business and communication skills. The commenter acknowledged the importance of this program.
33. One commenter stated that society as a whole needs to “step up.”
34. One commenter described his experience at a joint public hearing on the Taft campus.
35. One commenter expressed the belief that the DOE does not care for students, particularly students of color.

Summary of Comments Received at other public meetings

An information session was hosted by the Bronx Borough President at the Morris Educational Campus on March 15, 2012. The DOE attended that meeting to provide information to community members and answer questions.

The following questions, comments, and remarks were made at the meeting:

36. One commenter asked about the requirements for leadership change pursuant to the Turnaround model.
37. One commenter asked about SIG funding in relation to Educational Partner Organizations (EPOs). Specifically, since there are no EPOs in turnaround, who gets the equivalent money given to EPOs in restart, and who agreed to keep on the EPOs for these schools?
38. One commenter asked about the procedure for new schools to select the networks that will support them.

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

The DOE received the following written oral comments through the dedicated Web site and phone line for this proposal.

39. One written comment, submitted by New York Assembly Member Catherine Nolan, voiced the following:
 - a. General opposition to the proposal to close Fordham Leadership, and to the Turnaround model more generally.
 - b. Concern about the effect that this sudden change will have on the students, believing that it will particularly negatively effect outgoing seniors and incoming freshmen.
 - c. The proposal to close the school as well as the general announcement that it could be closed will negatively impact the school and decrease student enrollment.
40. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
41. One commenter asked about the DOE's engagement process for proposing to close the existing school and open a new school, and what part students, parents, and the community have in the process.
42. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
43. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
44. One commenter asked about what evidence the DOE has that this approach works, and whether a short-term measuring tool can be part of the model.
45. One commenter asked what supports are being offered to schools being closed and replaced.
46. One commenter asked what measures will be used to evaluate the progress of the new schools, apart from progress reports and quality reviews. The commenter also asked about what evaluations the DOE has done to assess progress made under previous interventions (i.e., transformation and restart).
47. One commenter asked about the timeline for the implementation of the new model.
48. One commenter asked about the supports that networks and other entities have provided to the schools that are in PLA status..
49. One commenter asked about how summer school will be implemented.
50. One commenter asked about how quickly new replacement schools will receive progress report grades, what short-term benchmarks are built into the Turnaround plan, and whether performance goals are built into the Turnaround plan.

51. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.
52. One commenter asked about who makes up the planning team for each school.
53. One commenter asked if the state mandates a JIT review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
54. One commenter asked if a JIT review was done for each of the 25 high schools on the turnaround list before the earlier intervention model (transformation or restart) was selected and before the Turnaround model was selected.
55. One commenter asked if the JIT reports are available to the public.
56. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
57. One commenter asked if rising ninth-grade students can opt out of a turnaround school.
58. One commenter asked about the \$58 million designated to New York City schools as SIG funding. Does this figure represent what was suspended as of January 3, 2012, or does it date back further?
59. One commenter asked if a school goes into turnaround, does it automatically get funding or is there a competitive process that takes place afterwards. The commenter also asked about how much funding each school would receive.
60. One commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.

The DOE received the following comments which are not relevant to the proposal.

61. One commenter asked about the supports that networks and other entities have provided to the schools that are in SINI status or have declining progress report grades.

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

Comments 1 and 39(a) voice general opposition to the proposal, and Comment 2 voices general opposition to the strategy of closing schools. Comments 12 and 13 suggest that the closure will have a negative impact on students, families, teachers, and the larger community. The DOE notes that the schools proposed for closure and replacement, including Fordham Leadership, have struggled to provide high-quality outcomes to students, and the DOE believes that closing and replacing the schools will provide a better educational option to current students because the new schools will preserve the school elements that had previously been successful while making the changes needed to accelerate the pace of improvement. While the DOE recognizes that the school is a central element to the community and its closure and replacement causes concern and implies a significant change, the DOE also believes that the benefits of closing and replacing the school, namely improved educational outcomes for students, make the proposal the right decision for this school community.

Comments 3 and 4 voice general support for the students and staff at Fordham Leadership. The DOE commends and acknowledges the students and staff at Fordham Leadership for their hard work and successes. However, the DOE believes that the students in this community will be better served by New School.

Comment 5 asks why the DOE is closing the school when it acknowledges positive achievements at the school. The DOE believes that while there have been some achievements at

Fordham Leadership, they are not consistent, frequent, or pervasive enough to signal that the school can rapidly improve outcomes for students in the same way that the closure and replacement of the school would allow.

Comment 6 suggests the school's challenges are the result of the former principal's leadership in the school, and Comment 7 states that the school should only be judged by the data generated under the current principal. The DOE believes that the current state of the school and student outcomes are the result of many contributing factors. That said, the DOE believes that the closure and replacement of Fordham Leadership is the best way to rapidly effect the significant improvement needed in the school. The current principal has been in the role for three months and is proposed to be the leader of New School. The DOE believes that this proposal will allow the new leadership the best opportunity to improve student outcomes at Fordham Leadership, and that to wait until there was a significant amount of data under the new leadership would mean risking a slower rate of change for students currently enrolled in the school.

Comment 8 suggests the school is struggling because of a lack of resources. In New York City, schools are funded through a per pupil allocation. Therefore, funding "follows" the students and is weighted based on students' grade levels and need (incoming proficiency level and special education/ELL/Title I status). Therefore, Fordham Leadership is funded in the same manner as its peers that are achieving better outcomes for students.

Comment 9 suggests the teachers in the school have not been provided sufficient professional development and that the plans for New School should instead be implemented in Fordham Leadership, and Comment 48 asks about support given to PLA schools in the past. PLA schools have been supported by their Children First Networks, as well as their EPOs, in the case of restart schools.

Regarding the first portion of Comment 9, the DOE believes that the school's staff has been supported in working to improve. As stated in the EIS, for the past several years, the DOE has sought to support Fordham Leadership in order to ensure that it was equipped to provide quality education for its students:

Leadership Support:

- Provided leadership training, coaching, and mentoring for the principal and leadership staff to help them set clear goals for the school and improve student performance, including around addressing targeted areas in need of improvement identified in the school's Quality Reviews, utilizing the Danielson Framework, and implementing Common Core Learning Standards.
- Discussed strategies with school leadership to utilize data analysis to address areas in need of improvement.

Instructional Support:

- Facilitated workshops and training to integrate Common Core Learning Standards through task deconstruction, analysis of student work, and curriculum alignment.
- Supported school staff in Special Education compliance issues and other supports and strategies for improving instruction and plans for students with disabilities.

Operational Support:

- Advised school staff regarding facilities management, and provided assistance, research, and

best practices, related to budgeting and procurement procedures.

- Assisted school staff with human resources issues.

Student Support:

- Facilitated the development of meaningful and rich relationships with community organizations like Lets Get Ready, in order to promote college readiness and provide students with SAT prep.
- Supported school staff on developing strategies and practices for improving student attendance and creating strategies for targeting attendance concerns.

Even with these supports, however, the DOE has determined that Fordham Leadership does not have the capacity to quickly improve student achievement.

Rather, and in response to the second portion of Comment 9 and to Comment 18, the DOE believes that the most expeditious way to improve the educational program for the students currently attending Fordham Leadership is to close the school and replace it with New School next year, rather than implementing the plans for a new instructional model, new strategic partnerships, new flexible scheduling, and new programs to engage parents in the existing school. This will allow the DOE to put in place a process to screen and hire the best possible staff for New School, giving all non-graduating students currently attending Fordham Leadership access to an improved faculty.

Comment 10 suggests that the large population of ELL students, special education students, and students with socio-emotional issues at Fordham Leadership provides a challenge to the school's overall performance. The DOE notes that while Fordham Leadership serves a higher percentage of students with IEPs than the borough average (20% of the population at Fordham Leadership, as compared with 17% of the population in the Bronx), the school serves the same percentage of ELL students as the borough average (both 17%). That said, the DOE takes student population into account when evaluating a school's performance. Specifically, the progress report offers additional credit to schools achieving success with these populations.

Further, the DOE notes that Fordham Leadership is more successful in serving this population than the school's general education population, relative to its peers. For example, in 2010, the school was in the 42nd percentile of Bronx high schools with respect to its graduation rate for students with IEPs, but was in just the 10th percentile with respect to its graduation rate for general education students. This data suggests that the population of students with special or greater needs is not the reason for the school's low overall outcomes. Regardless, all schools are expected to meet all students' needs, and the instructional outcomes of Fordham Leadership in recent years have not been adequate for general education, ELL students, or students with disabilities.

Comment 11 suggests that the EIS implies that teachers are the problem, which reduces student respect for teachers. If this proposal is approved, the New School will go through a process – in accordance with the DOE's existing contract with the United Federation of Teachers – to hire the best possible staff including current staff and new teachers. All teachers who apply to work at New School will be reviewed by a school-based Personnel Committee. The Personnel Committee will consider each candidate's teaching abilities and qualifications to contribute to a rigorous new school culture where every child is expected to succeed.

This will provide New School students access to an improved faculty. Our proposal to close and replace this school does not require the new school to turnover any set percentage of staff.

Comment 14 suggests that the closure and replacement will negatively impact the school's legacy for alumni and current students. The DOE believes that Fordham Leadership's alumni and future graduates will be recognized for their individual merits. Further, the DOE prioritizes the education of current students and will not forgo necessary educational interventions in the interests of preserving a legacy for past graduates. Current students in the school will graduate from the new replacement school, and therefore will have the legacy of the new school attached to their graduation achievement.

Comment 15 suggests that in a phase-out situation, the instructional focus shifts from educating students to credit recovery (where the aim is to get students credits to graduate, rather than provide rich instruction in traditional credit-bearing courses), and Comment 16 states that after-school programming will diminish for the same reason. While the DOE disagrees with this characterization, the proposal for Fordham Leadership is not for a gradual phase-out, but for immediate closure and replacement, under which all current students who do not graduate this year will be enrolled in the new school. As a result, the commenter's fears are unfounded—Fordham Leadership will not “wind down” and slowly reduce programming. New School will open for 2012-2013 ready and able to serve a similarly-sized student body.

Comment 17 asks why the DOE is implementing a new model, Turnaround, so soon after beginning to implement the Transformation model. In fact, Fordham Leadership was not placed in the Transformation model for this current school year. As stated in the EIS, while Fordham Leadership's 2009-2010 performance was declining in a number of areas, there were some indicators of improved performance, including a slight increase in the Class of 2010 graduation rate and Regents diploma rate, and the potential for continued improvement. As such, the DOE wanted to collect additional information to determine the most appropriate intervention for the school so instead Fordham Leadership was provided with \$300,000 in Title I funding to begin some initial improvement work.

Fordham Leadership's most recent Progress Report was released at the end of October 2011. The Progress Report indicated that the school's performance continued to decline during the 2010-2011 school year. Based on that data, the DOE identified Fordham Leadership as a struggling school requiring significant intervention and possible phase-out. As a result, the DOE initiated a comprehensive review of Fordham Leadership with the goal of determining what intensive supports and interventions would best benefit its students and the Fordham Leadership community. During that review, the DOE looked at recent historical performance and demand data from the school, consulted with superintendents and other experienced educators who have worked closely with the school, and gathered community feedback.

While Fordham Leadership's performance trends were concerning, the DOE determined at the end of its review that Fordham Leadership should not be phased out. Despite a number of challenges the school has faced, some data indicated that elements of Fordham Leadership are worth preserving. However, the DOE continued to have serious concerns about the school's ability to rapidly improve and began to explore other aggressive interventions that could quickly improve student achievement at the school.

In conjunction with the DOE's decision to close and replace a number of struggling PLA schools, the DOE has concluded that the right intervention is to close Fordham Leadership and replace it with a new school.

Comment 19 asks what new structures will be put in place in the school, and a portion of Comment 24

suggests that the new staff will be the only new element of the school. Based on available resources, student needs, and the availability of SIG funding, new elements planned for New School include but are not limited to: new strategic partnerships that reinforce the mission of the school to prepare students for college and careers, an updated instructional model that fosters project-based and interdisciplinary learning, small learning communities with flexible scheduling that encourage differentiated instruction, and new programs and learning opportunities to engage parents in their students' education.

Comment 20 asks how the staff will be selected at the school. Pursuant to the City's teacher contract, if this proposal is approved, pedagogical staff who apply to work at the New School will be reviewed by a school-based Personnel Committee. The proposed new leader will develop qualifications for positions in the New School, and the Personnel Committee will consider each candidate who applies. All teachers from the current school are eligible to apply to work at the new school. If sufficient numbers of staff from the closing school apply, at least fifty percent of the New School's pedagogical positions must be selected from among the appropriately licensed most senior, qualified applicants. There is no set percentage or limit on the number of staff from the closing school who can be hired to work at the New School. Decisions are made by the Personnel Committee of the New School.

Comment 20 also asks which of the current staff will be hired at the new school. This decision will be made by the Personnel Committee described above.

Comment 21 asks which students will be able to enroll in the new school and which will have to leave if this proposal is approved. All students who do not graduate before August 2012 will be enrolled in the new school. No students will have to leave the school.

Comment 22 asked how the school will close. This proposal is being presented for a vote of approval to the PEP at its April 26, 2012 meeting. If the PEP approves the closure of Fordham Leadership and the co-location of New School, then Fordham Leadership will close after the 2011-2012 school year. New School will open for the 2012-2013 school year, occupying the space in building X435 that Fordham Leadership previously occupied. New School will serve all current Fordham Leadership students who have not graduated prior to the start of the new school year, as well as all new ninth-grade students who would have otherwise attended Fordham Leadership.

Comment 23 states that the process of only keeping a portion of the current staff will destabilize the school, and Comment 39(b) and a portion of Comment 39(c) express concern about the impact of this change on the school. While closure may be a difficult experience for the school, the DOE believes that replacing Fordham Leadership with a new school, which preserves the best elements of Fordham Leadership but also has a process in place for putting the most effective educators in front of students, will allow the school's students to improve at a more rapid rate—and this will be a long-term stabilizing force for the school. With regard to the portion of Comment 39(c) that states that the school's enrollment will decrease as a result of this proposal, the DOE acknowledges that schools labeled PLA by the state have an additional obstacle for recruiting students. However, the DOE anticipates that the plans for the new school and how it will be an improvement upon Fordham Leadership will actually be helpful to the school in increasing student interest. Finally, it bears noting that Comment 23 inaccurately characterizes New School's policy for hiring staff, described in greater detail above.

Comment 24 inaccurately states that the new school's staff will be comprised of exactly 50% of existing Fordham Leadership teachers and 50% teachers new to the school. While the federal

Turnaround model requires that no more than 50% of a teaching staff in a school proposed SIG funding for Turnaround could be rehired, that the DOE's proposal to close and replace Fordham Leadership does not require a maximum number of current teachers who can be rehired through the 18-D process.

Comment 25 states that there are significant fiscal costs to the plan. The DOE notes that Comment 25's cost estimate of \$180 million dollars hinges upon several faulty assumptions. For example, it assumes that 50% of the staffs in the 33 school originally proposed for turnaround will be replaced. However, the DOE has since withdrawn several proposals. Further, new schools will be hiring no fewer than 50% of qualified staff, but may in fact hire back more. Finally, it is possible that some members of the teaching staffs at the schools proposed for closure and replacement who do not apply or are not rehired at the new schools may choose to retire or leave the system to find jobs in other districts or paths. However, regardless of the final number of teachers added to the ATR pool as a result of this and other turnaround proposals, the DOE believes that the new schools will be better positioned to promote student achievement than the schools proposed for closure, in light of their inability to improve quickly enough for the current students enrolled in the schools.

Comment 26 states that the DOE does not collect feedback at joint public hearings and comments have no impact on proposals, and Comment 41 asks about the engagement process and what part students, parents, and the community play in the process. Last Spring, the Department held meetings to begin or continue conversations with PLA schools and their communities about the schools' performance and possible improvement strategies. In January 2012, after taking into account a number of factors, the DOE decided to implement different, more intensive interventions at some PLA schools. At that time, Superintendents and Children First Network staff met with school communities to talk about the DOE's proposal to close and replace the school.

The DOE issued proposals to close and replace a number of PLA schools between February 27 and March 5, 2012, consistent with applicable New York State law and Chancellor's Regulations. The proposal for Fordham Leadership was posted on February 27, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for Fordham Leadership was held on March 30, 2012, as well as through voicemail and email. Parent feedback is incorporated throughout this document, which is presented to the PEP to help inform their decision about this proposal. The DOE also considered feedback received from the community in deciding whether to continue with the proposal.

The DOE also attended several meetings hosted by elected officials throughout the City. For example, the DOE attended a parent forum in the Bronx, held at Morris Educational Campus on March 15, 2012, which many community members attended. Feedback received at this forum is also incorporated throughout this document.

While the DOE understands that some parents disagree with the proposal, the DOE believes it is the right decision for students.

Comments 27, 28, and 30 states that the Turnaround proposals are a political move to oppose the United Federation of Teachers ("UFT") and Council of School Supervisors and Administrators ("CSA"), rather than one aimed at improving student achievement. As stated above, the DOE believes that closing Fordham Leadership and replacing it with New School will provide a better educational option to current and future students, which is expected to prompt student improvement more rapidly and with more certainty than previous interventions and supports, which have not led to adequate gains. Thus, this proposal is squarely aimed at improving student

achievement. Further, to the extent that this proposal may help secure SIG funding for DOE students, this is an educational aim, not a political one, as these resources are crucial to helping students succeed. However, even if the DOE does not receive SIG funding as a result of this proposal, the DOE believes New School will be better positioned to promote student achievement than is Fordham Leadership, in light of Fordham Leadership's inability to improve quickly enough.

Comment 36 asks about requirements for leadership change under the federal Turnaround model. In this model, if a principal has been in his or her role fewer than three years, then the principal may become the principal of the proposed new school, subject to a waiver by SED. If the individual has served as principal at the school for over three years at the time of the school's initial implementation of a SIG model, then the Turnaround model requires that he or she must be replaced.

Comment 37 asks about SIG funding for EPOs. Though it is strictly required as part of Restart, Education Law 211-e allows for Educational Partnership Organizations (EPOs) to work with any persistently lowest-achieving school, under any School Improvement Grant model. The decision whether or not to partner a new school with an EPO will be made on a case by case basis by the DOE.

Comment 38 asks about how new schools select networks. During the spring, new schools and networks have opportunities to learn about one another, after which new schools are asked to request networks (this occurs during at the same time as any requests from existing schools to change networks). Final decisions about school and network matches are expected in April.

Comment 40 asks about delays in implementation of Common Core as a result of these proposals. This proposal will not delay the implementation of the Common Core Learning Standards into curriculum and classroom instruction. In fact, the DOE believes that by closing and replacing the school, the Common Core will be implemented in a more thoughtful and substantial way. In particular, as part of this process, the new school has the opportunity to determine where there were instructional gaps in the old school's curriculum, and develop a plan to support teachers in implementing the Common Core Learning Standards effectively in the new school.

Comment 42 suggests these plans will result in teachers moving between PLA schools. The guiding principle of this work is to effectively match teacher capacity to the needs of the students in a specific school along with structural changes to the new school that will enhance its ability to best serve our students. This means that the new replacement schools will only hire those teachers they believe will be effective and well-matched to their new missions.

The schools will accomplish this through the staffing process set forth in Article 18-D of the DOE's existing contract with the United Federation of Teachers ("UFT"), which will allow a Personnel Committee to determine the best staff for the new school. The Personnel Committee consists of, at minimum, the following five representatives: the school principal, two designees of the UFT President, and two designees of the Chancellor. The school-based Personnel Committee will evaluate applicants' qualifications. The Personnel Committee should strive to seek consensus in its hiring decisions; however, if consensus cannot be reached, decisions are made by majority vote.

In this way, the DOE believes that only those teachers who will be most effective will be hired by the new schools. As stated in the EIS, current teachers from Fordham Leadership who are not hired at New School will remain in excess.

Barring system-wide layoffs, excessed teachers will be eligible to apply for other City positions, and any teachers who do not find a permanent position will be placed in the Absent Teacher Reserve (“ATR”) pool, meaning that they will continue to earn their salary while serving as substitute teachers in other City schools. This will not count as a cost or savings to New School, but could increase overall ATR costs to the DOE.

Comments 43 and 44 ask about past implementation of the 18-D process, and specifically which schools have done this successfully, how, and what measurements of success were used.

As described above, the hiring process for new schools replacing a closing/phasing out school is implemented according to Article 18-D of the existing contract between the DOE and the UFT.

All teachers from the current school are eligible to apply for positions at the new school.

In addition, comment 29 asks for evidence that the closure and replacement strategy is effective. Since 2002, the DOE has opened approximately 200 new high schools as replacements for high schools that have been phased out or closed. Each of these new schools has hired its teachers through the 18-D process. As a group, these new schools have outperformed the schools they have replaced.

Below are a few examples:

- The new schools located on the Springfield Gardens Campus in Queens had a graduation rate of 68.0% in 2010, compared to Springfield Gardens High School’s graduation rate of 41.3% in 2002.
- The new schools located on the Evander Childs Campus in the Bronx had a graduation rate of 69.1% in 2010, compared to Evander Childs High School’s graduation rate of 30.7% in 2002.
- The new schools located on the Park West Campus in Manhattan had a graduation rate of 70.4% in 2010, compared to Park West High School’s graduation rate of 31.0% in 2002.
- In 2010, the schools on the Van Arsdale campus in Brooklyn had a graduation rate of 82.9%—nearly 40 points higher than the former Harry Van Arsdale High School’s graduation rate of only 44.9% in 2002.
- The Erasmus Hall Campus graduated only 40.7% of student in 2002. The new schools on the Erasmus campus are graduating 75.8% of students in 2010, a 35 percentage point increase over the closed school.

Comment 45 asks about the supports offered to the new schools.

The existing schools will continue to be supported by their networks through the end of the school year. The students will also be supported through the efforts of the Office of Student Enrollment to ensure that students have a guaranteed seat in the new school and receive a clear understanding of their enrollment options. Replacement schools are being supported through several coordinated measures. Proposed principals for the replacement schools began working with the Division of Portfolio Planning, in February and March, as part of the Turnaround Principal Institute. In this intensive workshop, principals have been supported in planning for their schools along a wide spectrum, including such elements as mission-creation, curriculum planning, scheduling, and hiring, among other topics. Proposed leaders also continue to be supported by their Children First Network in this work.

Comment 46 asks about the measures that will be used to evaluate new schools in addition to progress reports and quality reviews. The Division of Portfolio Planning will work with the Networks that support each school to monitor each school's improvement plans and progress in these plans.

Comment 46 also asks about the evaluation of progress under previous interventions. For the first cohort of SIG schools, identified in the 2009-2010 school year, the DOE used the progress report grades and quality review scores through the spring of 2011 to evaluate the progress of these schools. For the second cohort of SIG schools, identified in the 2010-2011 school year, the DOE made qualitative assessments about the schools through visits to the school by Networks, superintendents, other DOE senior staff, and representatives from SED.

Comment 47 asks about the timeline for implementation of this proposal. This proposal will be presented to the Panel for Educational Policy on April 26, 2012. If it is approved, the school will then begin the 18-D process. The new school, with its planned new elements and staff (made up of returning teachers and teachers new to the school), would open in September 2012 and would serve all students currently in the school who have not graduated by that time, as well as any new students who would have otherwise begun attending the closed school.

Each school has unique elements in its new school plan, many of which will be implemented at the start of the 2012-2013 school year. However, some schools have plans to phase in the new elements more gradually. For more information about the specific plans of the new school, please see the EIS posted here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/April2012Proposals.htm>.

Comment 49 asks how summer school will be implemented. Summer school will continue to be implemented as in years past. Each year, a number of school buildings host summer school programs. Individual schools choose to affiliate to a particular building for summer school opportunities for their students, which may mean offering their own programs for their students, offering a summer school program in partnership with other schools.

Of the buildings that will be open to host summer school in 2012, some have schools which have been proposed for closure and replacement, though many do not. Regardless, all students currently attending a school proposed for closure and replacement will have the opportunity to attend summer school, either in their home building or in the one with which their school has affiliated. Students are typically assigned to summer school during June, and this same process will be in place this year for students in all schools, whether they attend one proposed for closure or not.

For more information about summer school, please see the DOE's Web site at: <http://schools.nyc.gov/ChoicesEnrollment/SummerSchool/default.htm>.

Comment 50 asks about measurement of the new schools' student outcomes. Fordham Leadership will receive its last Progress Report in fall 2012 reflecting its performance in the 2011-2012 school year; this Progress Report will not include a grade. Under current policy new schools in their first year receive Progress Reports with no grade. Under this policy, the new replacement school would receive an ungraded 2012-13 Progress Report. The Progress Report methodology is reevaluated each year and this policy is subject to change.

Comment 51 asks about the impact of the new schools and the closure/replacement approach.

The DOE believes that the strategy of closing and replacing PLA schools will provide a better educational option to current students more rapidly and with more certainty than current interventions, which were simply not adequate in order to make the school an acceptable choice for current and future students. The closure/replacement strategy will preserve the elements of former school that have led to improvement, while giving the new school the wherewithal to build upon it and accelerate the pace of change.

By closing this school and replacing it with a new school, the DOE is seeking to quickly create a high-quality school environment that children need to prepare for success in college, work, and life. Schools that have historically undergone this process have track records of shifting the culture of the school further toward one that sets high expectations that support student learning and achievement.

For more specific information regarding the anticipated impact of a proposal, please refer to the Educational Impact Statement(s) (and Building Utilization Plan, where applicable) for the particular proposal.

Comment 52 concerns planning teams for the new schools. Planning teams for each school are composed of the proposed leaders for the schools, as well as the schools' Children First Networks, and EPOs (where applicable). These teams are also receiving support from the Office of School Development, in the Division of Portfolio Planning.

Comments 53, 54, and 55 concern JIT reviews for the schools proposed for closure and replacement.

The DOE works with SED to conduct JITs for schools that become newly identified into one of the following categories:

- Restructuring, Year 1
- Restructuring, Advanced
- Persistently Lowest Achieving

JIT reviews are performed after the state identifies schools which are failing to make sufficient progress. JITs that were conducted during the 2010-2011 school year, including the one for Fordham Leadership on November 3-4, 2010, can be found here:

http://www.p12.nysed.gov/accountability/School_Improvement/Reports/1011/1011JIT.html.

Comment 56 concerns whether the new school will serve over-the-counter, ELL and/or over-age under-credited students. As stated in the EIS, new schools replacing closed schools will serve all types of students, including over-the-counter ("OTC") students, English language learner ("ELL") students, students with disabilities, and over-age, under-credited students. For more specific information, please refer to the EIS describing the proposal.

Comment 57 asks about whether rising ninth graders can opt out of the replacement school. All students who currently attend the school, as well as all of those who would otherwise have attended the existing school for the first time, will have a guaranteed seat in the new school. The DOE believes that New School will support student success at a level that the current school cannot, and therefore all students are encouraged to take advantage of their guaranteed seat in the new school.

As indicated in the EISs, students who listed a school proposed for closure on their high school admissions applications had the opportunity to submit a new application during Round Two. Schools with available seats as well as some new high schools designated to open throughout the City for the 2012-2013 school year were available for these students to consider in that round. If a student already

received a match in Round One (whether to a school proposed for closure, or any other school), that match will be nullified if the student receives a Round Two match, which are issued at the end of April.

In addition, all students in non-terminal grades who currently attend Title 1 Schools in Need of Improvement (“SINI”) Year 2 status or worse (including PLA schools), such as School Fordham Leadership, are also eligible to apply for a transfer to another non-SINI school through the DOE’s existing No Child Left Behind (“NCLB”) Public School Choice Process. More information about this process can be found at the DOE’s Web site at:

<http://schools.nyc.gov/choicesenrollment/changingschools/default>.

Comment 58 and 59 concern the availability of SIG funding. New York City received \$58,569,883 in funding from SED for 2011-2012 to support implementation of School Improvement Grants in 44 schools (19 Transformation, 14 Restart, and 11 phaseout replacements funded under the Turnaround model). As discussed in more detail in the EISs, outstanding funding for the Turnaround and Restart schools was suspended by the New York State Education Department after the DOE and UFT were unable to reach an agreement on a new teacher evaluation system by January 1, 2012. The DOE is hopeful that this SIG funding will be restored to some of these schools based on the new SIG proposals submitted to SED in March 2012. If the State approves the DOE’s application to place New School into the Turnaround model, New School will be eligible for up to \$2M per year as part the School Improvement Grant program. However, the challenges in these schools are too great, and the need to overcome those challenges is too urgent, to not take immediate action to address key aspects of the school’s culture, systems, and staffing, whether or not SED ultimately authorizes funding.

Comment 60 asks about funding for restart schools. The DOE is currently working with six Educational Partnership Organizations (“EPOs”) to support 14 schools. The DOE has committed to provide funding for the EPO contracts through the conclusion of this school year. This commitment should ensure that the programmatic initiatives that EPOs have in place this year at Restart schools can be completed with fidelity. This commitment to fund the contracts regardless of SED’s reimbursement is only for this school year. The future work of EPOs may not continue if the Department unable to gain access to SIG funding.

Changes Made to the Proposal

No changes have been made to this proposal.