



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of High School of Graphic Communication Arts (02M625) and Opening and Co-Location of a New High School (02M536) with Business of Sports School (02M393) and Urban Assembly Gateway School for Technology (02M507) in Building M625 Beginning in 2012-2013

Date of Panel Vote: April 26, 2012

Summary of Proposal

On February 27, 2012, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to close High School of Graphic Communication Arts (02M625, “Graphics”), an existing district high school in building M625 (“M625” or “Graphics Campus”), located at 439 West 49th Street, New York, NY 10019, within the geographical confines of Community School District 2. It currently serves students in grades nine through twelve. The DOE also proposed to immediately replace Graphics with New School (02M536, “New School”); a new district high school serving students in grades nine through twelve in building M625.

On April 20, 2012, the DOE posted an amended EIS that corrects the state approval status of some CTE programs offered at Graphics and at New School. Some typographical errors were also corrected. If this proposal is approved, Graphics 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.

Graphics is co-located with Business of Sports School (02M393, “BOSS”), an existing district high school that is phasing in, currently serving students in ninth through eleventh grades, and will serve students in ninth through twelfth grades at scale; and with Urban Assembly Gateway School for Technology (02M507, “Gateway”), an existing high school that is phasing in, currently serving students in ninth grade, and will serve students in ninth through twelfth grades at scale. In addition, the Graphics campus houses an Alternative Learning Center (88M882, “ALC”), where students attend school while they are suspended from their regular school, and a Work-Based Learning Center, which provides support to Career and Technical Education (“CTE”) schools and their students who have internships with industry partners. Graphics admits students through the Citywide High School Admissions Process through an Educational Option method. Graphics offers two Career and Technical Education programs for incoming ninth-grade students, and is in the process of phasing out two additional CTE programs currently serving students in grades ten through twelve.

BOSS and Gateway both admit students through the Citywide High School Admissions Process, and each offers one CTE program.

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 Graphics and replacing it with New School, the DOE is seeking to expeditiously improve educational quality on the Graphics campus. If this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen prospective staff – including Graphics staff who applies 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 immediately improving teacher quality and, by extension, improving the quality of learning. New School also 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 also will 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 Graphics and incorporate new elements, including new talent designed to better meet student needs. Thus, the immediate closure and replacement of Graphics 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 High School of Graphic Community Arts, Business of Sports School, and Urban Assembly Gateway School for Technology.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building M625 on April 3, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 35 members of the public attended the hearing, and 6 people spoke. Present at the meeting were Deputy Chancellor Kathleen Grimm; Community Education Council (“CEC”) D2 President Shino Tanikawa; CEC D2 member Tamara Rowe; Manhattan High School Superintendent Tamika Matheson; Graphics Principal Brendan Lyons; Gateway SLT representative Ellen Hogarty; BOSS SLT representatives E. Carredor and Josh Golons; Graphics SLT representative Richard Rocco; Citywide Council on High Schools (“CCHS”) President Paola de Kock.

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

1. Shino Tanikawa of CEC D2 commented:
 - a. The proposal to change 50% of teachers at the school punishes people who are committed to the school
 - b. The DOE has not proven the Turnaround model improves schools
 - c. It is not certain that these Turnaround schools will receive SIG funds
 - d. The 33 turnaround proposals could collectively result in a cost of \$180 million for teachers placed in the Absent Teacher Reserve (“ATR”) pool.
 - e. The CEC D2 passed a resolution calling for the DOE to withdraw all Turnaround proposals

- f. Changing teachers does not address the fact that 85% of students live in poverty and have no family support. We are not accurately diagnosing the problem, and we are asking too much of the schools.
2. Paola de Kock of the CCHS commented:
 - a. The Turnaround proposal does not seem to be a well-thought out plan
 - b. She is concerned about the hiring of teachers – if only 50% of current teachers can remain for federal Turnaround model, where will the other teachers come from? New teachers from Teach for America are not excellent teachers because they are new; hiring teachers from the ATR pool may be circulating other allegedly failing teachers
 - c. Supports differentiated instruction and iZone, but class sizes are too large for single teachers.
3. Graphics SLT representative Richard Rocco asserted the following:
 - a. Graphics has been making steady improvements
 - b. The staff is excited about the new principal Brendan Lyons
 - c. The current administration and staff should be kept together and allow Graphics to improve.
4. One commenter stated that the cost of the teachers placed in the ATR pool as a result of the 33 turnaround proposals would be \$180 million, and that the proposals are not educationally sound.
5. The UFT chapter rep from Graphics stated:
 - a. that teachers require time to form bonds with students, which would be harmed by the proposal to replace 50% of the teachers
 - b. replacing half the faculty would be a set back to the changes being implemented by the new principal; turnaround would slow progress.
 - c. The plan to reduce enrollment at Graphics so the number of seats equals the number of applicants is a positive move.
 - d. Graphics is not failing
 - e. The High School Superintendent had complimented the positive energy at prior meetings.
6. Alice O’Neill, the Manhattan UFT High school representative stated that no one was disputing the Graphics graduation rate or that there is work to be done at Graphics. She disagreed with the CEC representatives and stated that every student could learn, and the teachers were committed to working hard.
7. A special education teacher asserted that:
 - a. The turnaround model does not take relationships into account.
 - b. The withdrawal of 7 turnaround proposals was a political ploy
 - c. Changes are occurring at Graphics
8. An English teacher asserted
 - a. The DOE had allowed Graphics to flounder under poor leadership, as demonstrated by its declining progress report scores
 - b. The school has lacked licensed APs in several subjects, limiting the mentoring available to new teachers.
 - c. Teachers have been overwhelmed by the number of special education students, and have not received sufficient training
 - d. The teachers’ needs should be considered, and teachers should not be “dumped”
9. A parent spoke of the positive experience her son is having at Graphics. Her son was previously in a special education program. She opposed the closing because students need good schools.
10. An attendee submitted a question asking when the next progress report would be published, and whether it would have any impact on this proposal.

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

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

The DOE received the following comments about all closure/replacement proposals for PLA schools:

11. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
12. 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.
13. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
14. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
15. 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.
16. One commenter asked what supports are being offered to schools being closed and replaced.
17. 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).
18. One commenter asked about the timeline for the implementation of the new model.
19. One commenter asked about the supports that networks and other entities have provided to the schools that are in PLA/SINI status or have declining progress report grades.
20. One commenter asked about how summer school will be implemented.
21. 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.
22. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.
23. One commenter asked about who makes up the planning team for each school.
24. One commenter asked if the state mandates a JIT review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
25. 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.
26. One commenter asked if the JIT reports are available to the public
27. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
28. One commenter asked if rising ninth-grade students can opt out of a turnaround school.
29. 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?

30. 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.
31. One commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.
32. The DOE received a petition opposing the proposals to close and replace schools, which was signed by approximately 1,300 people, on the following grounds:
 - a. The DOE should not close schools and instead support them, including providing proven programs and curricula, professional development, health services for students, and additional student time for tutoring and enrichment.
 - b. End the policy of sending large concentrations of high needs students to schools then targeted for closure.
 - c. End the policy of co-locating charter schools in buildings with struggling district schools or district schools assigned large numbers of high needs students.
 - d. Create a new chancellor's district to support struggling schools and schools with large populations of high needs students, such as the one in place before the current administration.

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

Comments 1a, 3c, and 8d relate to the impact on current teachers if the proposal is approved. 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. As a result of this proposal, 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.

Although it is likely that not all current Graphics teachers would be re-hired at the new school, teachers would be able to seek other positions through the DOE's Open Market hiring process. Each year 3,000-4,000 teachers change schools through this process. Any teachers who did not find permanent positions in new schools would be placed in the Absent Teacher Reserve pool, whose members generally serve as substitute teachers. Thus, no current teacher would become unemployed as a result of this proposal.

Comment 1b states that the turnaround model is unproven. the. Since 2002 the DOE has phased out and eventually closed 58 high schools and opened 210 new high schools. During this time period, the graduation rate has improved by 19 percentage points (using the State calculation approach, graduation rates have increased 18 percentage points since 2005), and independent research has demonstrated that the new small high schools have higher graduation rates than other unscreened high schools, even among the highest need student populations. Since the inception of the federal School Improvement Grants program, 11 of these new school replacements have qualified for the federal Turnaround model. Thus, the DOE believes that there is evidence that Turnaround can be effective. While the specific turnaround plan for Graphics calls for the immediate closure and replacement of the school, rather than a phase-out and replacement, the DOE believes that the possibility of incorporating successful elements of Graphics into the new school justifies the choice of immediate replacement rather than phase-out.

Comment 1c raises the concern that the new school may not receive SIG funds. This comment is accurate, as SIG funding is dependent upon a determination by the State Education Department that the

new school meets all of the requirements of a federal school intervention model like Turnaround. However, as stated in the EIS, the DOE intends to proceed with this proposal regardless of whether SIG funding is available, because it believes that the proposed staff, structural, and programmatic changes at New School will better serve students.

Comments 1d and 4 relate to the total potential cost of the ATR pool that would result from the 33 closure and replacement proposals originally made by the DOE. The cost calculations in the comments assume that 50% of the staff at those 33 schools would become ATRs. That assumption is inaccurate for two reasons. First, the DOE has subsequently withdrawn 7 of the 33 proposals. Second, it is not possible at this time to predict the number of teachers who may be in the ATR as a result of these proposals. Teachers are able to apply for positions in the replacement for their current school, at any of the 10 new high schools the DOE is opening in September 2012, or at other existing schools that have openings. Many teachers are expected find new positions through these routes. Also, some teachers may choose to retire. Only those teachers who do not find other positions would be placed in the ATR pool, where they would be assigned as substitute teachers. So while there is likely to be some increase in the ATR pool, the exact impact is likely to be less than the total asserted by the commenters. Moreover, the DOE believes that it is more important to focus on the improvements to student outcomes anticipated as a result of this proposal and the similar proposals for other PLA schools, than the potential increase in the total number of teachers system-wide.

Comments 1e and 2a express general opposition to all closure-and-replacement proposals. 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. With regards to Graphics, the DOE believes that the closure-and-replacement strategy will give students on the campus a better chance to succeed in the future. The DOE has been working with the leaders of the schools proposed for closure and replacement in order to develop specific plans to address the needs of each school. The current principal at Graphics is the proposed new leader for the replacement school, and has been actively involved in the development of plans to improve the quality of instruction and school culture at Graphics. The plans for downsizing Graphics and reducing the number of CTE programs at this school were planned and began implementation a year ago. The DOE believes it must take action to support students who are not being well served in PLA schools.

Comment 1f suggests that schools are not able to address the needs of students who are affected by poverty and lack of home support. Schools are responsible for educating students regardless of their home circumstances. In addition to content teachers, schools provide counseling and guidance services, and a high school diploma is a critical tool in helping students expand their life opportunities beyond their current circumstances. Using a student's poverty or home life as an excuse for a school not providing the education a student deserves and needs suggests that students' futures are entirely dictated by their current circumstances, and blames children for the problems of the adults around them.

Comment 2b raises concerns about the quality of teachers that would be hired to replace current teachers, and where they would be hired from. Some of the teachers who are hired at the new school would be experienced teachers who apply through the Open Market. Teachers look for new jobs through the Open Market for many reasons, including the desire for a new challenge or different environment. Teachers in the ATR pool may be excellent teachers who were previously at schools that were proposed for closure; some teachers may not have been a good fit in a different environment, but may be highly qualified and work well in a different school. In addition to the Open Market, new schools may hire up to 40% of their teachers from outside the current DOE teacher pool. These may be new teachers, or teachers relocating from other cities.

Comment 2c raises concerns about class sizes and supports iZone and differentiated instruction. High school classes are targeted by contract to a maximum of 34 students. The 2011-2012 class size report shows average class sizes in all subjects at Graphics well below that figure, though there may be some classes at or above the maximum. The school may choose to program more or fewer class sections for different subjects based on the existing teachers, student needs, and alternate choices for how to allocate school funds vs. reducing class sizes. iZone programs will help teachers provide differentiated instruction to better meet individual student needs.

Comments 3a, 3b, and 5c support the efforts of the current principal, who is proposed to be the leader of the new school, and expresses the hope of allowing the staff to continue. The DOE is proposing that the current principal of Graphics serve as the principal of New School. Also, as noted above, in accordance with 18-D, at least 50% of the most highly qualified, senior applicants from Graphics will be hired as teachers at New School. While it is likely that some teachers will not be rehired, they will have the opportunity to apply for teaching positions at other high schools throughout the City.

Comments 5a and 7a speak about the need for time for teachers to build relationships with students, which the speakers imply would be compromised by the proposed changes to staff. While teacher relationships are important, it is also important to note the large number of students at enrolled at Graphics who are not succeeding in the current environment; the potential changes in staff may help these students develop positive relationships with different teachers.

Comment 5b suggests the change in teachers would slow progress at Graphics rather than accelerate it. There is no data to suggest this would be the case. By creating new schools and enabling principals to build teams of staff who share an instructional and cultural vision for the school, the DOE has demonstrated increased graduation rates for the highest needs students. The DOE believes the closure and replacement of Graphics will enable the school to accelerate its gains; whereas over the past decade Graphics' graduation rate has not kept pace with the improvements made at other high schools in the City, and Graphics has dropped from the 31st percentile Citywide in 2002-2003 to the 16th percentile in 2010-2011.

Comments 5c-e, and 7c speak to positive aspects of current changes at Graphics. This proposal is expected to build upon these positive changes and retain the aspects of Graphics that are working best for students.

Comment 6 did not raise a specific issue for response.

Comment 7b is about the withdrawal of closure and replacement proposals for seven other PLA schools, and thus does not relate to this proposal. However, the DOE continuously assesses all school situations. The seven proposals that have been withdrawn were all schools that, unlike Graphics, received A's or B's on their 2010-2011 Progress Reports. After further engagement with these schools demonstrated, we came to believe that these schools have a strong enough foundations to improve with a less intensive intervention.

Comments 8a and b suggests the DOE allowed Graphics to decline. The DOE has supported Graphics through its network, through changes in leadership, through changes to the programs offered, and the intentional enrollment reduction. Specific staffing and professional development are the responsibilities of school leadership and the school's network. Additional details of past supports provided are listed in the EIS on page 7. The DOE's assessment at this stage is that the proposal to close and replace the school will support rapid improvement for students.

Comment 8c suggests there has been an increase in special education students and insufficient training for teachers dealing with special education students. From 2009-2010 to the present, the number of students with IEPs at Graphics has been declining, in accordance with the overall planned enrollment reduction. The percentage of students with IEPs has been constant. As noted in the EIS, Graphics is providing improved outcomes for special education students, with 44% of students in Special Classes (“SC”) graduating, which is in the top 20% of high schools Citywide.

Comment 9 speaks to positive experiences at Graphics. As noted in the EIS, there are some positive elements at Graphics. The close-and-replace strategy will allow the new school to build upon those positive elements of Graphics to better serve more students.

With regard to Comment 10, the DOE Progress Reports are released in October or November; the State PLA list in December or January. Neither will impact this current proposal, which will be voted upon by the Panel for Educational Policy on April 26, 2012.

Comment 11 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 12 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 the 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 Graphics was posted on February 27, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for Graphics was held on April 3, 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.

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

Comment 13 suggests these plans will result in teachers moving between PLA schools. The guiding principle of this is work is to effectively match teacher capacity to the needs of the students in a specific school. The new replacement schools will seek to hire those teachers they believe will be effective and well-matched to their new school 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”), 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.

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.

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 14 and 15 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.

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 16 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. Finally, pending the availability of School Improvement Grant funding, Educational Partner Organizations (“EPOs”), which worked with schools previously implementing the Restart model, will continue to partner with replacement schools.

If these proposals are approved, during the 2012-2013 school year and beyond, as they implement the plans being made this spring and summer, new schools will be supported by their networks, the Division of Portfolio Planning, and, where relevant, their EPOs.

Comment 17 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 17 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 18 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 19 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. Specific supports provided to each school are listed in their respective EISs, available at the link above. Supports for Graphics included:

Leadership Support:

- Coached and trained leadership on implementing plans in support of Citywide instructional initiatives, including the Danielson Framework and Common Core Learning Standards.
- Advised leadership in developing strategies around Special Education compliance and supports and around preparing English Language Learners (ELLs) to succeed at higher learning standards.
- Supported leadership in fiscal and operational planning, including reviewing and planning budgets and planning for grants.

Instructional Support:

- Coached teachers in differentiating instruction, student goal setting, curriculum mapping, and other instructional tools to improve classroom pedagogy and advance student achievement.
- Trained teachers in tailoring instruction for Special Education students through differentiated instruction, flexible grouping (grouping created to provide a better instructional match or fit between students and their individual needs. Groupings can be created in a variety of ways including: readiness, interest, reading level, skill level, background knowledge, learning style, etc. This would allow teachers the opportunity to move away from the traditional stagnant method of organizing students by only one common element), and strategies for increasing student engagement.

Operational Support:

- Advised school staff on the hiring process, human resources issues, and teacher recruitment.
- Assisted teachers and school staff in documenting compliance with Special Education requirements.

Student Support:

- Partnered with organizations like the United Way, supported staff in analyzing and improving attendance through best practices geared at improving outreach to families and strengthening school culture.
- Offered professional development for teachers and counselors aimed at providing students with social and emotional supports, including training in counseling and in combating bullying behavior, as well as college advising.
- Facilitated the development of meaningful and rich relationships with various community organizations, including Junior Achievement, Justice Resource, K and L Law Firm, and Big Brother/Big Sister, in order to connect students with internship and mentoring opportunities to prepare them for success in college and careers.

Comment 20 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 21 asks about measurement of the new schools' student outcomes. New schools replacing closed schools will receive a progress report after the 2012-2013 school year; in other words, a progress report will be issued in the 2013-2014 school year assessing the school's progress during the 2013-2014 school year. The reports issued in 2013-2014 will only be based on those measures which provide "snapshots" of data over a one-year period, such as the percentage of students earning 10 or more credits

in their first year for high schools and the percentage of students earning a 3 or 4 on the State Math exam for middle schools.

These schools will not, however, receive an overall progress report grade in 2012-2013, as this measure is dependent upon year over year growth, which will only be available after the schools' second year in existence. Therefore, these schools will receive an overall progress report grade for the first time after the 2013-2014 school year.

Regarding goals, performance benchmarks are included in the SIG application for each of these schools. These include:

- Reduce the percentage of students in the All Students subgroup who are performing below the Proficient level (Levels 1 and 2) on NYSED ELA and Math assessments by 10% or more from the previous year
- Attain a minimum Total Cohort graduation rate of 60% after one year of implementation; (or) annually reduce the gap by a minimum of 20% between the school's Total Cohort graduation rate and the State's 80% graduation rate standard (for high schools only).

Comment 22 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 23 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 24, 25, and 26 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. Include date for relevant school

JITs that were conducted during the 2010-2011 school year can be found here:

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

Comment 27 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 28 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 XYZ, 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>.

Comments 29 and 30 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 31 is about funds spent to support Restart schools. The DOE is currently working with six Educational Partnership Organizations (EPO)s 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.

Comment 32 refers to signed by approximately 1,300 people opposing the proposals to close and replace schools. As stated earlier, the DOE has provided several supports to the schools in question, but

believes only their closure and replacement will accelerate the pace of change needed to achieve the desired improvement for current students in these schools.

The DOE does not have a policy of concentrating high needs students at specific schools. However, the DOE works to support schools which have above average percentages of students with high needs, including ELLs, students with disabilities, overage and under-credited students, students who come into schools “over-the-counter,” and others.

The DOE sites charter schools based on the availability of space, and these co-locations are not based on the quality of the schools already located within the buildings. The DOE believes that students should be provided with as many high quality options as possible.

The DOE currently supports struggling schools through the Children First Network selected by each school. In some cases, these schools work with the network to create an action plan for improvement. Also in some cases, such as for some of the schools approved for phase-out during the 2010-2011 school year, struggling schools are supported through a designated Transition Support Network. Additionally, schools are supported by the Division of Students with Disabilities and English Language Learners, as well as the Office of Postsecondary Readiness.

Changes Made to the Proposal

On April 20, 2012, the DOE issued an amended EIS. This amended EIS corrects the state approval status of some CTE programs offered at Graphics and at New School. Some typographical errors are also corrected. However, these changes did not significantly revise the proposal itself.