



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of Automotive High School (14K610) and Opening and Co-Location of a New High School (14K434) with Frances Perkins Academy (14K632) in Building K610 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 Automotive High School (14K610, “Automotive”), an existing district high school in building K610, located at 50 Bedford Avenue, Brooklyn, NY 11222, within the geographical confines of Community School District 14. It currently serves students in grades nine through twelve. The DOE is proposing to immediately replace Automotive High School with New School (14K434, “New School”), a new district high school serving students in grades nine through twelve in building K610.

If this proposal is approved, Automotive High School 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 a seat and automatically enrolled in New School.

Automotive High School is co-located with Frances Perkins Academy (14K632, “Frances Perkins”), an existing district high school that currently serves students in grades nine through twelve. Frances Perkins has a limited unscreened admissions method. A limited unscreened program gives priority to students who demonstrate interest in the school by attending a school’s Information Session or Open House events or visiting the school’s exhibit at any one of the High School Fairs. Students must sign in at these events in order to receive priority for admission to the school’s programs. In addition, K610 houses a Young Adult Borough Center (“YABC”). 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.

Automotive High School offers five Career and Technical Education (“CTE”) programs in four career clusters. Automotive admits students through the Citywide High School Admissions Process through the educational option and Limited Unscreened methods. It offers four different admissions programs under the Engineering interest area, including 1) Automotive Service Center Specialist, 2) Automotive Business Technology, Computer Repair and Electronics, 3) Auto Body Repair Technician, and 4) Pre-Engineering. Frances Perkins offers one CTE program in the Humanities and Interdisciplinary interest area and admits students through the Citywide High School Admissions Process through a Limited Unscreened 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 Automotive High School and replacing it with New School, the DOE is seeking to expeditiously improve educational quality in building K610. If this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen prospective staff – including Automotive High School 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 immediately 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. By improving the quality of teaching and learning in the school, DOE also will increase New School’s chance of receiving up to \$950,000 in supplemental federal funding under the federal School Improvement Grant (“SIG”) program. New School will build on the strongest elements of Automotive High School and incorporate new elements, including new talent, designed to better meet student needs. Thus, the immediate closure and replacement of Automotive High School 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 Automotive High School and Frances Perkins Academy.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building K610 on March 28, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 65 members of the public attended the hearing, and 21 people spoke. Present at the meeting were Automotive High School Leadership Team (“SLT”) Representatives Bill Kalogeras, Alisa Dialto, Ava Henton, Tiffany Judkins and Caterina Stanczuk; Frances Perkins SLT Representative Karla L. Chiluiza; Councilmember Stephen Levin’s Chief of Staff Ashley Thompson; Children First Network 403 Representative James Whitfield. Although Community Education Council (“CEC”) 14 was invited to the hearing and confirmed that at least one CEC member would attend, no CEC 14 members appeared at the hearing.

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

1. Several commenters voiced general opposition to the proposal.
2. Several commenters (including representatives of Automotive High School’s SLT and Councilmember Levin’s Chief of Staff) voiced general support for Automotive’s staff, teachers and students.
3. Multiple commenters noted the positive achievements and successes that some students have had at Automotive High School and after their graduation.
4. Multiple commenters noted that the school provides a positive and supportive community environment that helps students to succeed.
5. Several commenters expressed the belief that the changes in school leadership over the past few years have negatively impacted the school’s performance. These commenters also asked how the DOE or this proposal will address these leadership and administrative issues.

6. One commenter inquired as to why the Transformation Model was being stopped halfway though its implementation. The commenter felt that it did not make sense to propose closure without having fully implemented the transformation plan.
7. One commenter asked why the DOE established a method of tracking, retaining, and moving effective teachers to struggling schools under the Transformation model, but then departed from it with this turnaround proposal?
8. One commenter asked how the proposed closure and replacement of Automotive was distinct from the transformation plan that was recently implemented.
9. One commenter proposed that the school should be a Restart school, not a Turnaround school.
10. One commenter expressed concern that the Turnaround policy will place a fiscal burden on the city, and that excessing teachers and placing substitutes in the classroom will cost the city approximately \$180 million dollars annually.
11. Several commenters asked how bringing in new staff will address all the challenges that the school is facing, such as the overall lack of organization and communication in the school, as well as the lack of clarity regarding both short and long-term goals for teachers, staff and the larger school community.
12. Two commenters expressed the belief that the DOE has not provided the needed resources to Automotive.
13. Multiple commenters expressed the belief that the school is being closed only to receive funding from the state.
14. Several commenters asked why the DOE could not just give the money directly to the school instead of closing Automotive and opening another school under a different name.
15. One commenter claimed that the school was put on the Persistently Low Achieving list due to only one metric.
16. Two commenters claimed that in addition to the statistics cited regarding Automotive's overall performance, the DOE should consider the background of these students and the neighborhoods where they live.
17. One commenter stated that the DOE did not acknowledge that Automotive's graduation rate has increased since 2007. The commenter claimed that the school is, in fact, progressing.
18. Multiple commenters felt that the initiatives detailed in the EIS are vague and that it is not clear how this plan will help improve the school community.
19. Several commenters claimed that this proposal is a tactic aimed against the United Federation of Teachers and the Council of Supervisors and Administrators. These commenters further claimed that this proposal is not concerned with the students and/or their achievement.
20. One commenter asked how the DOE expects teachers to succeed when all the struggling students are placed into one school like Automotive, and the school is not given the appropriate resources to address those needs.
21. Two commenters expressed the belief that removing half the staff will destabilize the school and have a psychological impact on students.
22. One commenter asked how Automotive will improve by bringing in teachers with whom the students have no previous relationships.
23. One commenter felt that there would be nothing new about the school other than that fifty percent of the teachers would be new while the other teachers are assigned to schools elsewhere.
24. One commenter noted that CTE schools like Automotive High School are being closed throughout the city and the commenter felt that these schools are not being adequately replaced.

25. Several commenters voiced concern about the impact on the CTE programming if the proposal is approved.
26. Multiple commenters noted the importance of the school's history and legacy, and believed that students will be negatively impacted if this proposal is approved.
27. Multiple commenters suggested that the community members should come together to help improve the school.
28. One commenter proposed that we should improve Automotive High School by incorporating green technology and getting corporate sponsorships.

During the question and answer portion of the joint public hearing, the following questions were submitted:

29. If the proposal to close the school is approved, what will happen to the students who are currently enrolled?
30. If this proposal is approved, what will happen to the school's CTE programming and what programming will be offered in the future?
31. Why did the DOE decide to close the school instead of restructuring it?
32. Why are 50% of the school's staff being fired?

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

33. Multiple commenters voiced general opposition to the DOE.
34. One commenter voiced general opposition to the Panel for Education Policy ("PEP").
35. One commenter voiced opposition to the current mayoral administration.
36. Multiple commenters voiced opposition to the current educational reform movement.
37. One commenter noted that, according to the New York Times, only one in four students are college and career ready upon graduation.
38. Two commenters expressed the belief that the DOE only sees schools and students as numbers and statistics.
39. One commenter claimed that the community needs to regain control of the school system.
40. One commenter encouraged the public to join his organizing efforts at the Southside Community Schools Coalition.
41. One commenter noted that educators from Chicago visited Automotive High School and used the school as model for another school in Chicago.
42. One commenter noted that his activist group is working to save the Roberto Clemente school and preserve the history of the name.
43. One commenter asked why Automotive High School does not have an entry exam.
44. One commenter expressed a lack of trust in the DOE statistics and numbers. The commenter also claimed that the DOE should use qualitative data, not quantitative data, to measure student progress and school performance.
45. One commenter expressed the belief that the feedback given at the public hearing has no impact on the proposal or the PEP vote.

Summary of Comments Received at Other Public Meetings

An information session concerning proposals to close and replace schools, generally, was hosted by the Brooklyn Borough President at Borough Hall on March 12, 2012. The DOE attended that meeting to provide information to community members and answer questions.

The following questions, comments, and remarks directly related to the proposal to close and replace Automotive were made at this meeting:

46. One commenter noted that the school has experienced lots of instability, especially in the past four years where the school has had three different principals and six different English assistant principals. These inconsistencies have negatively impacted the school's performance and progress.
47. One commenter noted that it does not make sense that the Transformation model was implemented two years ago, the school was named a Restart school last year and is now a Turnaround school.
48. One commenter noted that there was violence at the school.
49. One commenter expressed concern about students dropping out of schools as a result of this proposal, and asked about what percentage of the cohorts are leaving before graduation.
50. One commenter asked about the financial cost of all turnaround proposals and recommended using the funds to instead support the existing schools, teachers, and programs.
51. One commenter stated that it is wrong to close schools because of a disagreement between the union and the mayor.
52. One commenter stated that the school was promised the Restart model, and the staff is getting worn down by broken promises.
53. One commenter stated that Transformation is a 3-year model, but is being changed after one and a half years.
54. One commenter asked why Boys and Girls HS got 2 consecutive F grades on its progress report, but isn't being closed.
55. One commenter asked why the DOE is closing schools that recently received A or B grades on their progress report.
56. One commenter asked who will write recommendation letters for students applying to college.
57. One commenter stated that parents should be included on 18-D hiring committees.
58. One commenter questioned the DOE's ability to fix schools in light of some minor confusion regarding joint public hearing dates.
59. One commenter asked from where all the new teachers will be hired.
60. One commenter asked about accountability in future years with the replacement schools. Specifically, if the replacement schools do not progress, will the DOE close them and open another new school?
61. One commenter asked about how a new school will be more successful when the student population being served will be exactly the same?

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

The DOE received 26 comments through the dedicated Web site and phone line for this proposal.

62. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
63. 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.
64. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
65. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
66. 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.
67. One commenter asked what supports are being offered to schools being closed and replaced.
68. 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).
69. One commenter asked about the timeline for the implementation of the new model.
70. 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.
71. One commenter asked about how summer school will be implemented.
72. 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.
73. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.
74. One commenter asked about who makes up the planning team for each school
75. One commenter asked if the state mandates a JIT review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
76. 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.
77. One commenter asked if the JIT reports are available to the public
78. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
79. One commenter asked if rising ninth-grade students can opt out of a turnaround school.
80. 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?
81. 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.
82. One commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.
83. One commenter asked if a new school replacing a restart school can choose not to keep its EPO.

84. One commenter asked what the new high school will be named if the proposal is approved.
85. One commenter stated that this plan is disruptive to the school community and has no continuity.
86. One commenter stated that the Turnaround proposals are causing tremendous lack of morale in schools' staffs
87. One commenter stated that any economic reasons cited for this proposal are unfounded.

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

Comment 1 concerns general opposition to the proposal to close Automotive High School. Automotive High School has struggled to provide high-quality outcomes to students. While the DOE recognizes that the school's closure and replacement will result in significant change, and the DOE believes that closing and replacing it will provide a better educational option to current students rapidly.

Comments 2, 3, and 4 voice general support for the students and staff at Automotive High School. The DOE commends and acknowledges the students and staff at Automotive High School for their hard work and successes. However, the DOE believes that the students in this community will be better served by the new school. This proposal aims to provide a new quality option which preserves the elements of Automotive that have led to improvement, while giving the new school the ability to build upon them while accelerating the pace of change.

Comments 5 and 46 suggest that the school's low performance is due to the change in leadership over the last few years and asks how this will be addressed by the proposal to close the school.

The DOE believes that the current state of the school and student outcomes are the result of many contributing factors. However, acknowledging the importance of strong leadership, the DOE has taken several measures to provide additional support to the proposed principals for the replacement schools, including the proposed principal for New School. These proposed leaders began working with the Office of School Development, within the Division of Portfolio Planning, in February and March, as part of the Turnaround Principals Institute. In this intensive workshop, proposed new leaders 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 have also been continually supported by their networks.

Comments 6, 7, 8, 9, 31, and 47 concern the DOE's rationale for implementing the Turnaround model so soon after the Transformation model. Comment 14 suggests that the DOE should provide funding directly to Automotive High School instead of implementing Turnaround.

As a preliminary matter, Automotive High School was not placed in the Transformation model. Rather, in May 2011, following the review of the schools designated as PLA, the DOE decided to place Automotive High School in the Restart model for this current school year. That decision was predicated on some positive trends in 2009-2010.

As stated in the Educational Impact Statement ("EIS"), under the Restart model Automotive High School was eligible for up to \$950,000 in SIG funding per year for three school years. However, Automotive High School's continuing eligibility for these funds was conditioned upon the DOE and UFT agreeing by January 1, 2012 to implement a new teacher evaluation system. Unfortunately, by the January 1, 2012 deadline, the DOE was unable to reach an agreement with the UFT on integral elements of this new teacher evaluation system. Because of this, SED informed the DOE that all New York City

PLA schools in either the Transformation or Restart models would no longer receive SIG funding to continue the school reforms supported by these models

Concurrently, the DOE reassessed the viability of Transformation and Restart as an effective intervention model for these schools and determined that a more intensive intervention was needed to achieve the desired student outcomes for current and future students. Regarding Automotive specifically, some of Automotive High School's metrics declined during the 2010-2011 school year, such as its four-year graduation rate, and other data indicated that the educational environment at Automotive was not improving with sufficient speed. Based on most recent data, the DOE determined that closing the current school and creating a new school to replace it was the most rapid way to achieve expeditious reform.

Comment 10 contends that the Turnaround proposals will cost the City \$180 million as a result of supporting excessed teachers in the ATR. This estimate depends upon several inaccurate and improbable assumptions: First, it assumes that 50% of the staffs in the 33 schools originally proposed for closure and replacement will be replaced. However, the DOE has since withdrawn several proposals. Furthermore, comment 10 does not take into account that new schools may in fact hire back more than 50% of current staff. Second, comment 10 assumes that all teachers who are not re-hired at New School will join the ATR. Yet, it is highly likely that some members of the teaching staffs at the schools proposed for closure 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. Therefore, these staff members will not join the ATR.

Comments 12 and 20 suggest that Automotive did not receive sufficient 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 level and need (incoming proficiency level and special education/ELL/Title I status). Therefore, Automotive High School is funded in the same manner as its peers which are achieving better outcomes for students. For example, Brooklyn High School for Law and Technology (16K498), a school in Automotive High School's peer group, is serving a similar population of students with IEP's and English Language Learners. In 2010-2011, 20% of the students at the High School for Law and Technology had IEP's and 5% of the students were ELL's. That school achieved a four-year graduation rate of 77% in 2011. During the same year, 25% of students at Automotive High School had IEP's and 5% of the students were ELL's. Yet, Automotive High School's four-year graduation rate was only 54%.

Comments 13 and 87 suggest that this proposal is only being implemented to receive State funding. As stated previously, the Department is proposing to close and replace this school because we believe that doing so will provide a better educational option to current students more rapidly and with more certainty than current interventions, which were simply not adequate to achieve the desired outcomes for current and future students. If the State approves the DOE's application to place New School into the Turnaround model, New School will be eligible for up to \$950,000 per year for one as part the School Improvement Grant program. However, the challenges at Automotive 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 15 contends that Automotive was identified as a PLA school based on a single metric. NYSED identifies high schools as PLA if they have a State graduation rate below 60% for three consecutive school years or if performance and improvement on the English and Math Regents exams are below a defined threshold. Automotive High School was first designated as PLA during the 2009-2010 school year and again in the 2010-2011 school year. As described in the EIS, in proposing to close

and replace Automotive, the DOE also considered several other metrics that indicated that Automotive is not serving its students well. For example:

- Automotive High School is not adequately preparing students for the rigors of college and career. Only 1% of students in the class of 2011 were prepared for college after four years in high school, well below the Citywide rate of 25%.
- The Progress Report measures the progress and performance of students in a school as well as the school environment, compared to other schools serving similar student populations. Automotive High School earned an overall C grade on its 2010-2011 annual Progress Report, with a B grade on Student Performance, a C grade on Student Progress, and an F grade on School Environment.
- The school's attendance rate remains below that of most high schools. The 2010-2011 attendance rate was 78%, putting Automotive High School in the bottom 10% of City high schools in terms of attendance.
- Safety issues have been a concern at the school in recent years. On the 2010-2011 New York City School Survey, only 59% of students reported feeling safe in the hallways, bathrooms, and locker rooms. This response puts the school in the bottom 2% of high schools Citywide. In addition, only 42% of teachers reported that discipline and order were maintained at the school.

Comment 16 suggests that the DOE should take student demographics into account when making school closure decisions. The DOE does take the student population into account when evaluating a school's performance. The overall Progress Report grade is designed to reflect each school's contribution to student achievement, no matter where each child begins his or her journey to career and college readiness. The methods are designed to be demographically neutral so that the final score for each school has as little correlation as possible with incoming student characteristics such as poverty, ethnicity, disabilities, and English learner status. To achieve this, the Progress Report emphasizes year-to-year progress, compares schools mostly to peers matched based on incoming student characteristics, and awards additional credit based on exemplary progress with high-need student groups. Each school's performance is compared to the performance of schools in its peer group, which is comprised of New York City public schools with a student population most like the school's population, according to the peer index. The peer index is used to sort schools on the basis of students' academic and demographic background, and the formula to calculate a school's peer index includes the percentage of students eligible for free lunch, the percentage of students with disabilities, the percentage of Black/Hispanic students, and the percentage of ELL students at the school. For middle schools, each school has up to 40 peer schools, up to 20 schools with peer index immediately above it and up to 20 with peer index immediately below it. Thus, Automotive was compared against its peer group, which is comprised of other New York City public schools with similar student academic and demographic background.

Significantly, the progress report offers additional credit to schools achieving success with high needs populations. Please refer to the response to comments 12 and 20 for more information.

Comment 17 concerns Automotive's graduation rates. The EIS acknowledges that Automotive's 6-year graduation rate has increased over the last three years, although its 4-year graduation rate has fluctuated. However, graduation rates at Automotive High School have been consistently low for over ten years in comparison to citywide averages. In 2011, Automotive High School's four-year graduation rate (including August graduates) was 54% — well below the 2010 Citywide graduation rate of 65.1%, and putting the school in the bottom 14% Citywide. In 2007-2008, Automotive High School's graduation rate was 53%, just 1 percentage point lower than the school's current 4 year graduation rate. Because the pace of progress at Automotive is not sufficiently rapid, the DOE proposes to close and replace it with New School.

Comment 18 suggests that the EIS does not explicitly state how the proposal will improve the school. The impact of the proposal on affected students, schools, and the community is outlined in section three of the EIS. Specifically, Section III A. describes in detail how the new school will be better equipped to raise student achievement and meet the needs of both current and future students. Please also see the response to comment 23 for more information.

Comments 11, 21, and 22 are related to how removing 50% of the staff will impact current students and address the challenges faced by the school. Comment 19 suggests that implementing this model is specifically designed to undermine the UFT and CSA, and not to benefit students.

As part of the proposal, the new school will implement a variety of structural and programmatic changes designed to improve student learning from the levels currently seen at Automotive High School. These structural and programmatic changes will be enabled and supported by the new school's hiring process which will allow the DOE to screen and hire those teachers with the specific skills and talent necessary to properly implement the changes. The proposal to close and replace this school does not require the new school to turnover any set percentage of staff. Our primary objective is to make the structural and staffing changes necessary to ensure the best possible student outcomes in the New School.

Given the number of structural and programmatic changes that must be made in order to ensure that New School is able to effectively serve the needs of the students currently attending Automotive High School, the DOE believes that the newly screened and hired staff will be among the most important changes at the new school. In addition, New 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.

Comment 23 suggests that the new staff will be the only new element of the school. To the contrary, based on available resources, student needs, and the availability of SIG funding, new elements planned for New School include but are not limited to: changes to the school day schedule, new approaches to professional development, revamping CTE programming, and a new instructional plan grounded in Common Core Learning Standards and data-driven instruction. Furthermore, as described in the EIS, New School will offer Small Learning Communities, which will be further sub-divided into four cohort groups. Each cohort group will be led by a Teacher Director. Teachers of the four core subjects will also serve as Advisors and will each be responsible for a group of roughly 25 students, ensuring that each student's learning is closely monitored.

Comments 24, 25, and 30 are related to the proposal's impact on Automotive's current CTE programming. As described in the EIS, while Automotive offers five CTE pathways, Entrepreneurship/Virtual Enterprise, Pre-Engineering, Automotive Technician, Marketing, and Collision Repair, beginning with the 2013-2014 school year, New School will only offer Entrepreneurship/Virtual Enterprise, Pre-Engineering, Automotive Technician—it will not offer the Marketing and Collision Repair CTE pathways. Students who are currently in the Marketing and Collision Repair pathways will have the opportunity to complete the coursework in these programs, but those programs will not be available to new ninth graders after the 2012-2013 school year.

The DOE has been informed by SED that for approved CTE programs in schools proposed for closure and immediate replacement (like the Automotive Technician program at Automotive), the programs would continue to be approved provided the factors underlying approval, such as CTE curriculum, partner relationships, postsecondary articulation agreements, and certain other elements contributing to program quality, are incorporated in New School. The Office of Postsecondary Readiness ("OPSR")

will support the leadership of New School to gain state approval for the Entrepreneurship/Virtual Enterprise and Pre-Engineering programs, and maintain approval for the Automotive Technician program.

The decision to reduce the number of CTE programs offered was based on labor market trends, low student demand for the eliminated programs, and a desire to focus the new school's efforts on developing the 3 remaining CTE programs, which the DOE believes have the potential to be vibrant, engaging elements of the new school. The DOE believes that the remaining CTE programs will better prepare students for careers in growth industries. Finally, the DOE will continue to evaluate the potential to add new schools that provide high-quality CTE education in available space across Brooklyn.

For descriptions of approved and pending proposals that impact CTE seats in Brooklyn, please visit: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/default.htm>. Also, as mentioned earlier, the list of schools in the City that also provide CTE programs in the pathways currently offered by Automotive can be found in the Appendix to the EIS. A full list of City High Schools with more detailed information is available in the New York City High School Directory, which is available in print at DOE middle schools, Borough Enrollment Offices, or on the DOE's Web site at <http://schools.nyc.gov/ChoicesEnrollment/High/Directory/default.htm>.

Comment 26 contends that the closure and replacement will negatively impact Automotive's legacy for previous graduates and current students. As a preliminary matter, the DOE believes that the interests of current students should be the highest priority, and the desire to provide these (and future) students with the best possible educational environment drives this proposal. The DOE also believes that Automotive High School's previous and upcoming graduates will be recognized for their individual merits. Furthermore, 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 27 suggests that community members should mobilize to improve the school. While we acknowledge the importance of community participation and engagement, the DOE does not believe that community support alone will enable Automotive to make the changes necessary to dramatically improve student outcomes. However, the DOE encourages and welcomes community feedback on all of its proposals. When the Educational Impact Statements (and Building Utilization Plans, where applicable) are issued, they are made available to the staff, faculty and parents at the impacted schools on the DOE's Web site, and in each school's respective main office. In addition, the DOE dedicates a proposal-specific website and voicemail to collect feedback on this proposal. Furthermore, all schools' staff, faculty and parent communities are invited to the Joint Public Hearing to provide further feedback.

Although the DOE recognizes that people in the community may oppose this proposal, the DOE believes that, if this proposal is approved, the school community will benefit from a new high-quality option. Community members are invited to become active participants in New School, which will serve the same students that currently attend Automotive and who do not graduate before the beginning of the 2012-2013 school year.

Comment 28 suggests that Automotive High School should secure corporate partnership and incorporate green technology in an effort to improve the school. The DOE does not believe that a single factor will dramatically and expeditiously improve Automotive's performance. As stated in the EIS, Automotive currently partners with several organizations including:

Community-Based Organizations: Good Shepherd Services, National Foundation for Teaching Enterprise, CAMBA, Automotive Youth Educational Systems (AYES), Consortium for Worker Education

Higher Education Institutions: Brooklyn College, New York City College of Technology, Bronx Community College, Columbia Green Community College, Hudson Valley Community College, Ohio Diesel, Lincoln Tech, University Technical Institute (UTI), Morrisville State College - State University of New York (SUNY), WyoTech

Cultural/Arts Organizations: Rooftop Films Corporate: NYPD Fleet Service, McCarren Motors, Mercedes, Toyota, Advance Fleet Maintenance, Major Chevrolet, FDNY Fleet Service Division, M.I.C. Tire Pros, All-Boro, Auto Lab, Central Auto Info, Inc.

Other: AmeriCorps CityYear Program

If this proposal is approved, the DOE will work with the new school to ensure the smooth transition of all of the above existing partnerships from Automotive High School to New School. In addition, the replacement school may cultivate new partnerships to bring additional resources to the school community.

Comment 29 asks what will happen to current students if this proposal is approved. As discussed in the EIS, if this proposal is approved, all current students who have not graduated before the start of the 2012-2013 school year will be guaranteed a seat and automatically enrolled in New School.

Comment 32 asks why 50% of Automotive's staff will be fired. It is important to note that this proposal to close and replace Automotive does not require the new school to turnover any set percentage of staff. Our primary objective is to make the structural and staffing changes necessary to ensure the best possible student outcomes in the New School. There is no quota of staff that must be removed as a result of this proposal.

Pursuant to Article 18-D of the existing contract between the DOE and the UFT, current Automotive teachers have the right to apply and be considered for positions at the new school. If sufficient numbers of displaced staff apply, at least 50% of the new school's pedagogical positions shall be selected by the Personnel Committee from among the appropriately licensed, most senior applicants from the closing school, who meet the new school's qualifications.

Comment 48 is related to safety at the school. The EIS acknowledges that safety issues have been a concern at the school in recent years. On the 2010-2011 New York City School Survey, only 59% of students reported feeling safe in the hallways, bathrooms, and locker rooms. This response puts the school in the bottom 2% of high schools Citywide. In addition, only 42% of teachers reported that discipline and order were maintained at the school.

Pursuant to Chancellor's Regulation A-414, every school/campus must have a School Safety Committee. The committee plays an essential role in the establishment of safety procedures, the communication of expectations and responsibilities of students and staff, and the design of prevention and intervention strategies and programs specific to the needs of the school. The committee is comprised of various members of the school community, including Principal(s); designee of all other programs operating within the building; United Federation of Teachers ("UFT") Chapter Leader; Custodial Engineer/designee; and In-house School Safety Agent Level III. The committee is responsible for addressing safety matters on an ongoing basis and making appropriate recommendations to the Principal(s) when it identifies the need for additional security measures, intervention, training, etc.

Each school building must also establish a Building Response Team that will consist of trained staff members from each of the campus' schools and programs, and which is activated when emergencies or large building-wide events occur. The members of this team must be identified and listed in the School Safety Plan.

Furthermore, school safety agents are allocated to schools based on each building's projected enrollment. The NYPD School Safety Division looks at a set of variables to determine the number of safety agents to deploy to a particular school building, including the crime rate, size and design of the building, enrollment, and grade span.

Comment 49 asks about the percentage of students not graduating. At Automotive, for the 2010-2011 school year, only 54 percent of students graduated in four years, and 67 percent graduated in six years. The DOE anticipates that the percentage of students who graduate from New School will increase.

Comment 50 concerns the financial cost of all the proposals to close and replace schools. In New York City schools are funded through a per pupil allocation. That is, funding "follows" the students and is weighted based on students' grade level and needs (as indicated by their incoming proficiency level and special education/ELL/Title I status). If a school's population declines from 2,500 to 2,100 students, the school's budget decreases proportionally—just as a school with an increase in students receives more money. Even if the Department of Education had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls.

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

Further, Automotive High School has struggled for several years. Although three and four years ago, the school received B grades on its overall progress report, the school's graduation rate has been between 53-60% for the past five years. As a result, the DOE believes that it is important to provide another option to students now.

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.

Please see response to comment 10 for more information.

Comment 51 expresses the opinion that these schools are being closed because the DOE and UFT failed to reach an agreement on the elements of a new teacher evaluation system. The DOE is closing these schools because it believes that a more intensive intervention is required to improve educational quality for students. New schools will incorporate the strongest elements of the former schools, while also allowing new staff and new programs to be put in place. They will provide a better educational option to students on the campus more rapidly and with more certainty than current interventions.

Comments 52 and 53 state that some schools were originally slated for other intervention models and should be allowed to continue implementing those. Automotive High School was placed in the Restart model in May 2011. However, after further consideration based on both the 2010-2011 school progress

report and feedback from SED about the pace of change in PLA schools, the DOE concluded that a number of PLA schools, including Automotive, should be closed and replaced with new schools. The DOE's intention in proposing the closure and replacement of these schools is to rapidly create an improved instructional environment that incorporates the best elements of the existing school with new elements in a new school, including an improved faculty that is better positioned to accelerate student learning.

By closing Automotive High School and opening a new school, the DOE will (1) align the DOE's intervention strategy with the school's most recent performance data and the DOE's most recent assessment of the steps which must be taken to improve performance at the school and (2) be able to immediately improve the quality of teachers serving students currently attending Automotive.

Comment 54 asks about why another school which has also been identified as PLA and has low progress report grades is not being closed. Decisions such as school closure and replacement are made on a case by case basis. There are a number of PLA schools which are not being proposed for closure/replacement. This is because the DOE believes that these schools have strong enough foundations to improve with a less intensive intervention..

Comment 55 asks about schools proposed for closure that received an A or B on the 2010-2011 progress report. When we began this process, we had concerns about the quality of teaching and learning in these schools. However, based upon community feedback and additional review by senior leadership at the Department, the DOE concluded that the improvements at these schools could lead to a successful school environment without closure and replacement.

On April 2, 2012 the DOE decided to withdraw the proposals to close and replace the seven schools which received an A or B grade on the 2010-2011 progress report. The DOE has also withdrawn the corresponding SIG applications to implement the Turnaround model that it submitted to the state for these schools.

Comment 56 concerns recommendation letters for students. Students will still be able to request that their teachers write recommendation letters for high school, college, or for jobs. The DOE anticipates that whether or not the teachers remain in the replacement schools, this will not impact their willingness to support students in this manner. Further, the new schools will assist students in locating teachers who may not be employed at the new school following approval of this proposal.

Comment 57 concerns parent involvement on 18-D personnel committees. The Personnel Committee for these new schools will consist of, at a minimum, the following five representatives: the school principal, two designees of the UFT President, and two designees of the Chancellor. This is consistent with how the 18-D personnel committees have functioned in previous situations.

Comment 58 concerns the scheduling of joint public hearings for proposals regarding Cobble Hill School of American Studies and Franklin Delano Roosevelt High School. A handout for these proposals, which was distributed at the Brooklyn Borough President's Forum on proposals to close and replace schools, contained errors regarding the hearing dates for these two schools. However, all communications with the schools themselves, and the notices which were backpacked home with students, contained the correct dates.

Comment 59 asks from where all the new teachers will be hired. Per Article 18-D of the DOE's collective bargaining agreement with the UFT, when a new school is created to replace a school that is being phased out or closed, the principal of the new school must develop and implement school-based competencies for hiring teaching staff. Then, a Personnel Committee is created to screen the teaching

applicants for the new school using these criteria. Personnel Committee membership consists of, at a minimum, two representatives appointed by the UFT President, two representatives appointed by the Chancellor and the principal of the new school.

The teachers in the school to be directly replaced by the new school have the right to apply and be considered for positions at the new school. If sufficient numbers of displaced staff apply, at least 50% of the new school's pedagogical positions shall be selected by the Personnel Committee from among the appropriately licensed, most senior applicants from the closing school, who meet the new school's qualifications. Any remaining teacher vacancies will then be filled by the Personnel Committee from applicants from the existing teacher pool, or as with all new district schools, if the school is unable to find sufficiently qualified applicants from within the existing teacher pool, the school will be provided an exception to hire at least up to 40% of its teaching positions from outside of the current teacher pool.

Comment 60 asks about accountability in future years for the replacement schools, and whether these schools would be closed if they do not show sufficient progress. The DOE holds all of its schools to the highest standards and counts on each school to provide a high-quality education to its students. If a school isn't getting the job done for students – whether it was opened recently or not – the DOE is compelled to take serious action to ensure its students don't fall even further behind. The DOE anticipates that the replacement schools will be successful. However, when new schools created under this administration struggle, the DOE follows the same process to phase out and replace that school.

Comment 61 asks how the closure/replacement plan will produce more successful schools when the student body remains the same. 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.

The DOE believes that all of these students are capable of high achievement, and that the replacement schools will be able to realize the potential of these students. In fact, in June 2010 MDRC, an independent research group, issued a report on NYC's new small schools strategy. MDRC concluded: "it is possible, in a relatively short span of time, to replace a large number of underperforming public high schools in a poor urban community and, in the process, achieve significant gains in students' academic achievement and attainment. And those gains are seen among a large and diverse group of students — including students who entered the ninth grade far below grade level and male students of color, for whom such gains have been stubbornly elusive." (MDRC, "Transforming the High School Experience," June 2010.). Please also refer to the response to comments 65 and 66

Commenter 62 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 63 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 Automotive High School was posted on February 27, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for Automotive was held on March 28, 2012, as well as through voicemail and email.

- The DOE also attended several meetings hosted by elected officials throughout the City. For example, the DOE attended a parent forum in Brooklyn, held at Brooklyn Borough Hall on March 12, 2012, regarding the proposals to close and replace schools, and 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 in the best interest of students.

Comment 64 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, along with structural changes to the new school that will enhance the its ability to best serve our students. In accordance with Article 18-D, the new schools will 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 calls for a Personnel Committee to consider all staff who apply to work at new school. The Personnel Committee consists of, at a 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 pedagogical staff who will be most effective will be hired by the new schools. As stated in the EIS, current teachers from Automotive High School 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 65 and 66 asks 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 67 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.
- Additionally, 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 68 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. The comment 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 69 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>

Comment 70 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 including. In particular, the DOE offered Automotive the following supports:

Leadership Support:

- Leadership training for the principal and assistant principals to help them set clear goals for the school while developing the school's Comprehensive Education Plan, Language Allocation Plan, and School Improvement Grant plan. Leadership support in implementing plans, including ongoing monitoring and revising based on student outcome data.
- Coached and trained leadership on implementing plans in support of Citywide instructional initiatives including common core learning standards and implementation of teacher effectiveness rubrics.
- Supported leadership and staff in generating meaningful strategies for improving the quality of classroom visitations and instructional feedback, as a way to improve teacher practice and improve student outcomes.

Instructional Support:

- Supported and trained teachers in classroom engagement strategies as a way to deepen instructional expectations, student interest, and classroom rigor. Supported teacher teams that engage in regular inquiry cycles including data analysis and review of student work, academic intervention planning and implementation, and ongoing monitoring and revising based on student outcomes.
- Supported school staff in Special Education instructional and compliance issues, including support for Integrated Co-Teaching ("ICT") classes, Individualized Education Program ("IEP") and other students with disabilities ("SWD"), IEP program implementations and timely writing of IEPs, alternative assessments, and other supports and strategies for improving instruction and plans for students with disabilities.

Operational Support:

- Advised school staff on school safety, budgeting, human resources, teacher recruitment and building management.
- Supported school staff on developing strategies and practices for improving student attendance and creating strategies for targeting attendance concerns addressing behavior and next steps for discipline issues.

Student Support:

- Facilitated comprehensive supports to review disciplinary and procedural protocols targeted at improving the school learning environment, school tone and culture, and impacting student outcomes.

- Facilitated the development of meaningful and rich relationships with various community organizations, including Good Shepherd Services, CAMBA, and Counseling in Schools. Good Shepherd Services promotes attendance improvement, fosters dropout prevention, raises college awareness, and provides counseling services and extended learning time opportunities. CAMBA offers a relationship abuse prevention program. Counseling in Schools provides Rites of Passage and other youth development services to targeted, high-need students.

Comment 71 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 with 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 72 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 SED English language arts 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 73 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 for this particular proposal.

Comment 74 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 Division of Portfolio Planning.

Comments 75, 76, and 77 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 Automotive High School can be found here:

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

Comment 78 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 79 asks about whether rising ninth graders can opt out of the replacement school. All students who currently attend a school proposed for closure and replacement, 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 Automotive, 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 80 and 81 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 82 asks if the DOE will have to repay the funding spent on the contracts with EPOs for 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 necessarily continue if the Department unable to gain access to SIG funding.

Comment 83 asks if a new school replacing a restart school can choose not to keep its EPO.

- 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.
- In many cases, EPOs have begun implementing improvement strategies with students at the closing school that we believe should be continued at the new school.
- For more information about the specific plans of the new school, including potential EPO partnerships, please see the EIS posted here:
<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/April2012Proposals.htm>.

Comment 84 is related to changing the name of Automotive High School.

A name for the proposed new school has not yet been determined. Consistent with Chancellor’s Regulation A-860, parents and community members associated with the proposed new school will be able to make suggestions for the name of the new school. As with all school names, the Chancellor retains final decision-making authority.

Comments 85 suggests that the closure and replacement plan at Automotive High School will be disruptive to the community. Comment 86 suggests that the proposal has resulted in low morale among the teaching staff.

This proposal is intended to provide current and future students with a better educational option. While we understand that this is a difficult transition for the school community, 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.

In addition, the DOE has determined that Automotive High School does not have the capacity to quickly improve student achievement. Rather, the DOE believes that the most expeditious way to improve the educational program for the students currently attending Automotive High School is to close the school and replace it with New School next year. 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 Automotive High School access to an improved faculty.

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.

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

No changes have been made to this proposal.