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Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of Sheepshead Bay High School (22K495) and the Opening and Co-Location of a New High School (22K453) with a District 75 Inclusion Program (75K811) in Building K495 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 Sheepshead Bay High School (22K495, “Sheepshead Bay”), an existing district high school in building K495 (“K495”), located at 3000 Avenue X, Brooklyn, NY 11235, within the geographical confines of Community School District 22. It currently serves students in grades nine through twelve. The DOE is proposing to immediately replace Sheepshead Bay with a new school (22K453, “New School”), a district high school serving students in grades nine through twelve in K495.

If this proposal is approved, Sheepshead Bay 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.

Sheepshead Bay is co-located with a District 75 inclusion program (75K811, “P811K@K495”). In an inclusion program, a student with special education needs receives services in a general education classroom along with general education students. Students in the P811K@K495 program are enrolled in Sheepshead Bay’s general education classes based on their respective Individualized Education Program (“IEP”) recommendations and receive Special Education Teacher Support Services (“SETSS”) from a District 75 special education teacher.

If this proposal is approved, beginning in September 2012, the students in P811K@K495 who are currently served in Sheepshead Bay’s general education classes will be enrolled in New School’s general education classes.

Sheepshead Bay offers five Career and Technical Education (“CTE”) programs in four career clusters. It admits students through the Citywide High School Admissions Process through both the educational option and the zoned method. Additional information about CTE programming and the High School Admissions Process is contained in Sections III.A of this proposal. New School is planning to continue programming in all of the same CTE career clusters that Sheepshead Bay currently offers and, therefore, students enrolled in CTE programming at Sheepshead Bay would have the opportunity to enroll in CTE programming at New School.

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 Sheepshead Bay and replacing it with New School, the DOE is seeking to expeditiously improve educational quality in K495. If this proposal is approved, New School will develop rigorous school-specific competencies to measure and screen prospective staff – including former Sheepshead Bay 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 doing this important work to improve student outcomes, the DOE also will maximize New School’s chance of receiving up to \$1,550,000 in supplemental federal funding under the federal School Improvement Grant (“SIG”) program. New School will build on the strongest elements of Sheepshead Bay and incorporate new elements, including new talent, designed to better meet student needs. Thus, the immediate closure and replacement of Sheepshead Bay 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 Educational Impact Statement (“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 office of Sheepshead Bay High School.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at K495 on March 28, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 140 members of the public attended the hearing, and 54 people spoke. Present at the meeting were the Chancellor’s Designee, Deputy Chancellor Marc Sternberg; Sheepshead Bay School Leadership Team (“SLT”) representative Thaddeus Russell; Community Education Council (“CEC”) representative Christopher Spinelli; and Citywide Council on High Schools (“CCHS”) representative Monique Lindsay. Representatives from the P811K@K495 SLT were invited to the hearing, but they were ultimately unable to attend. New York City Council Member Lewis A. Fidler and New York State Assembly Member Helene E. Weinstein’s chief of staff also attended the hearing.

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

1. The CEC representative stated that the CEC does not support the proposal for the following reasons:
 - a. Sheepshead Bay has improved with the current staff and administration.
 - b. Closing Sheepshead Bay and removing its teachers would jeopardize the progress that Sheepshead Bay has made.
2. The SLT representative stated that the SLT does not support the proposal for the following reasons:
 - a. Sheepshead Bay is a zoned school, and it accepts all students, including students who have recently immigrated to the United States from Eastern Europe, Africa, and the Caribbean. Thus, Sheepshead Bay’s staff must contend with students who have more challenging needs than other high schools. Because these students often require more than four years to graduate, Sheepshead Bay’s four-year graduation rate is unfairly lowered.

- b. Implementing the Turnaround model at Sheepshead Bay would result in current Sheepshead Bay students losing familiar staff members, which would be disruptive to current students, particularly the aforementioned students who recently immigrated to the United States.
 - c. Sheepshead Bay has improved since the school was initially ranked “Persistently Lowest Achieving,” and the school should be allowed to continue to implement school improvements under the Restart model.
3. The CCHS representative stated that Sheepshead Bay was not given sufficient time to implement improvements under the Restart model and asked if there was evidence that the Turnaround model worked.
4. Council Member Fiddler opposed the proposal for the following reasons:
 - a. Sheepshead Bay has improved under the Restart model.
 - b. Elected officials, including Council Member Fiddler, are committed to helping Sheepshead Bay improve if it remains open.
 - c. Removing current teachers from Sheepshead Bay who have contributed to the improvements that have already been made would jeopardize the overall progress the school has already made.
 - d. The proposal to close Sheepshead Bay and replace it with New School is primarily politically motivated and not aimed at improving instruction for students.
5. A representative of Assembly Member Helene E. Weinstein stated that Assembly Member Weinstein has asked New York State Education Department Commissioner John King to deny Sheepshead Bay’s Turnaround proposal.
6. A representative of the Council of School Supervisors & Administrators (“CSA”) stated the CSA opposed the proposal for the following reasons:
 - a. New staff would be hired at New School, but the qualifications have not yet been stated.
 - b. The potential loss of half of Sheepshead Bay’s staff would be disruptive to students.
 - c. If all of the Turnaround proposals are implemented, almost 1,800 teachers would be placed in the Absent Teacher Reserve (“ATR”), which would impose a cost of nearly \$180 million on the City. These are funds that should instead be used to support schools throughout the City.
7. Multiple commenters stated that closing Sheepshead Bay and releasing 50% of Sheepshead Bay’s staff into ATR would disrupt Sheepshead Bay’s progress under the current Restart model.
8. Multiple commenters opposed the proposal and stated that Sheepshead Bay should be allowed to continue to implement improvements under the Restart model.
9. A commenter opposed the proposal and stated that removing 50% of Sheepshead Bay’s staff would be ineffective because the majority of the teachers at Sheepshead Bay were recently hired and highly qualified.
10. A commenter opposed the proposal and stated that the proposal would threaten the partnerships that Sheepshead Bay has established that have benefited the school.
11. Multiple commenters stated that the proposal is politically motivated and not intended to benefit students.
12. A commenter stated that forcing experienced and highly qualified staff members who have worked at Sheepshead Bay for years to apply for positions at New School if Sheepshead Bay is closed is unfair and disrespectful to Sheepshead Bay’s staff.
13. Multiple commenters opposed the proposal and stated that, contrary to the DOE’s claims, Sheepshead Bay has successfully prepared students for college and careers.

14. Multiple commenters opposed the proposal and stated that New School would not be able to accept students of various backgrounds or allow current Sheepshead Bay students to explore and identify their passions.
15. Multiple commenters stated that there is no evidence that the Turnaround model is more effective than the Restart model.
16. Multiple commenters opposed the proposal and stated that Sheepshead Bay's successful programs, such as Council for Unity and the sports medicine, mock trial, and moot court programs, would be jeopardized by the proposal.
17. Multiple commenters stated that Sheepshead Bay's student demographics should be considered when analyzing Sheepshead Bay's academic performance because it should be evaluated by a different standard than other New York City schools.
18. Multiple commenters contended that closing Sheepshead Bay would sacrifice the school's assets from its extensive network of alumni and relationships within the community.
19. A commenter stated that Sheepshead Bay has been negatively affected by budget cuts, which resulted in fewer textbooks for students to take home.
20. A commenter asked a question about what would happen to SIG funding if the UFT does not approve the DOE's application to the New York State Education Department ("SED") to implement the Turnaround model in Sheepshead Bay.
21. Multiple commenters asked questions about where students would go to get all of the services and choices that they get at Sheepshead Bay.
22. Multiple commenters asked questions about the criteria that will be used to evaluate teachers.
23. Multiple commenters asked questions about the qualifications of the panel that will evaluate teachers.
24. A commenter asked a question about where the teachers who would be fired and/or excessed will be placed.
25. Multiple commenters asked why the original plan to implement the Restart model was canceled and the Turnaround model is now being implemented.
26. A commenter asked why Sheepshead Bay has been proposed for closure.
27. A commenter asked how a shuffle of 50% of Sheepshead Bay's teachers would help the school.
28. A commenter asked if feedback from the community and stories about student success outweighed Sheepshead Bay's statistics in deciding whether Sheepshead Bay should stay open.

Summary of Comments Received at other public meetings

An information session was hosted by the Brooklyn Borough President at Brooklyn 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 were made at the information session:

29. If the proposal is approved, New School should be allowed to remain named "Sheepshead Bay High School."
30. The community is pleased with the improvements that the current principal has implemented since 2005.
31. Though there are problems with the Restart model, particularly around the collaboration with the Educational Partner Organization, it seems that the Restart model is working.
32. Replacing 50% of Sheepshead Bay's staff will not benefit students.

33. The DOE needs to recognize that Sheepshead Bay's students, often because of their challenging backgrounds, require more than four years to graduate. In many cases, they graduate within six years.
34. A commenter asked about the financial cost of all Turnaround proposals and recommended using the funds to instead support the existing schools, teachers, and programs.
35. A commenter stated that it is wrong to close schools because of a disagreement between the UFT and the Mayor.
36. A commenter stated that Transformation is a three-year model, but it is being changed after one and a half years.
37. A commenter asked why Boys and Girls High School, which received two consecutive overall F grades on its Progress Report, is not being closed while Sheepshead Bay is being closed.
38. A commenter asked why the DOE is closing schools that recently received overall grades of A or B on their recent Progress Reports.
39. A commenter asked who will write recommendation letters for students applying to college.
40. A commenter questioned the DOE's ability to fix schools in light of some minor confusion regarding joint public hearing dates.
41. A commenter asked from where all the new teachers will be hired.
42. A 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?
43. A 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 twenty written comments and fifteen oral comments through the dedicated Web site and phone line for this proposal.

44. Multiple commenters stated that the proposed closure of Sheepshead Bay and opening of New School is not fair to Sheepshead Bay's staff because it forces them to apply for positions that they already hold.
45. Multiple commenters stated that the proposal would result in replacing experienced staff members with inexperienced teachers who would not be familiar with the needs of Sheepshead Bay's students.
46. Multiple commenters stated that Sheepshead Bay's problems stem from the fact that its students are not all from the Sheepshead Bay neighborhood and that the school would improve if school's enrollment policies were revised to only enroll students from the Sheepshead Bay neighborhood.
47. Multiple commenters stated that Sheepshead Bay should be allowed to continue under the Restart model.
48. Multiple commenters contended that the proposal would be detrimental to students because it would disrupt their educational experience and existing relationships with supportive teachers.
49. Multiple commenters contended that closing Sheepshead Bay would endanger Sheepshead Bay's successful programs, such as its law program.
50. Multiple commenters contended that the proposal would be costly because the City would need to continue to pay the salaries of teachers who would not be hired at New School.
51. A commenter stated that Sheepshead Bay should remain a comprehensive high school instead of being split up into small academies.

52. A commenter asked if current Sheepshead Bay students are required to attend New School in the 2012-2013 school year.
53. Multiple commenters contended that the proposal is politically motivated and should not be approved because it would not benefit students.
54. Assembly Member Catherine Nolan submitted a letter stating her opposition to the proposal for the following reasons:
 - a. Sheepshead Bay has not had sufficient time under the Restart model to see the full effects of the changes it implemented under that model.
 - b. The proposed closure of Sheepshead Bay has damaged the school's reputation and deterred parents from sending students to Sheepshead Bay, which would further damage the school because it would lead to a smaller school budget.
 - c. The proposed closure of thirty-three schools and opening of thirty-three new replacement schools pose a strain on personnel and resources that would cause structural and organizational problems for the DOE.
55. A commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of the Turnaround proposals.
56. A 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.
57. A commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
58. A commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
59. A 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.
60. A commenter asked about the supports that are offered to schools that are implementing school closure and replacement.
61. A commenter asked about the measures that 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., the Transformation and Restart models).
62. A commenter asked about the timeline for the implementation of the Turnaround model.
63. A commenter asked about the supports that networks and other entities have provided to the schools that have been designated as Persistently Lowest Achieving or as a School in Need of Improvement or have declining progress report grades.
64. A 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.
65. A commenter asked about the impact of the new schools and implementing the closure/replacement approach.
66. A commenter asked about who makes up the planning team for each school.
67. A commenter asked if the state mandates a Joint Intervention Team ("JIT") review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
68. A 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.
69. A commenter asked if the JIT reports are available to the public.
70. A commenter asked if the proposed new school will receive over-the-counter, English Language Learner, and over-age under-credited students.

71. A commenter asked about the \$58 million designated to New York City schools as SIG funding and whether this figure represented what was suspended as of January 3, 2012, or whether it dates back further.
72. A commenter asked about whether a school that enters the Turnaround model would automatically get funding or whether there would be a competitive process that takes place afterwards. The commenter also asked about how much funding each school would receive.
73. A commenter asked if the DOE will have to repay the funding spent on the contracts for schools currently implementing the Restart model.
74. A commenter asked about how summer school will be implemented.
75. A commenter contended that the new schools will be exempt from evaluation.

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

- Comment 26 relates to the reason for the DOE's proposal to close and immediately replace Sheepshead Bay.

The New York State Education Department ("SED") identifies a school as Persistently Lowest Achieving ("PLA") either because the school failed to meet performance index targets and/or had a graduation rate less than 60% for three consecutive years. SED identified 54 schools in New York City as PLA as of December 9, 2010. In May 2011, the DOE assigned 44 of 54 schools designated as PLA to one of the four federally-approved intervention models and submitted SIG applications to SED where appropriate. Following SED's review and approval, 19 schools were assigned to the Transformation model and 14 schools were assigned to the Restart model. Sheepshead Bay was one of the schools assigned to the Restart model. Eleven schools which the DOE concluded were not able to quickly improve student performance were assigned to implement the phase in/phase out version of the Turnaround model, where one or more new schools replace the PLA school over a number of years, while the PLA school stops accepting students and phases out gradually. In the remaining 10 schools, the DOE wanted to collect additional information to determine the most appropriate intervention, and thus these schools were not assigned a SIG model. Instead, the DOE provided \$300,000 in Title I funding to each of those 10 schools to support them to begin some initial improvement work and plan for more intensive intervention in subsequent years.

The continuing eligibility for state funds under the Transformation and Restart model was conditioned upon the DOE and the UFT agreeing by January 1, 2012 to implement a new teacher evaluation system. Unlike the Turnaround model, the Transformation and Restart models require the implementation of a comprehensive teacher evaluation system based on multiple measures. This new teacher evaluation system is intended to enable schools to improve student achievement through a more robust and rigorous teacher evaluation process, which in turn would result in more targeted support for struggling teachers and greater accountability for ineffective teachers by allowing for their expedited removal when they are not serving students well.

The DOE was unable to reach an agreement with the UFT by the January 1, 2012 deadline 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.

After SED informed the DOE that the Transformation and Restart models were no longer available to New York City schools and that funding had been suspended, the DOE began to look at alternative approaches it could take to ensure that the supports and funding started under the

Transformation and Restart models could continue and be strengthened. Furthermore, the continuing lack of a new teacher evaluation system led the DOE to further evaluate other options that were available to improve teacher quality.

After these evaluations, the DOE concluded that a number of PLA schools, including Sheepshead Bay, should be closed and replaced with new schools. By closing Sheepshead Bay 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 increase the quality of teachers serving the students currently attending Sheepshead Bay.

- Comment 38 asks about schools proposed for closure that received an A or B on the 2010-2011 Progress Report.

The DOE originally proposed these schools for closure and replacement because student achievement is not as strong as it needs to be, and/or the rate of improvement is too slow. However, based upon feedback received from the school communities and additional review by senior leadership at the DOE, 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 SIG applications for Turnaround that it submitted to SED for these schools.

- Comment 19 contends that Sheepshead Bay was negatively affected by budget cuts, which resulted in fewer textbooks for students to take home.

While the DOE acknowledges that budget cuts have impacted schools across the City, budget cuts have not disproportionately impacted Sheepshead Bay specifically or schools that have been proposed for closure and immediate replacement generally. In 2010-2011, individual school budgets Citywide were cut by an average of 4%. It should be noted that principals have discretion over their budget and make choices about how to prioritize their resources.

- Comments 13 and 28 contend that Sheepshead Bay has successfully prepared students for success in college and their careers.

Contrary to the commenters' claims, Sheepshead Bay is not adequately preparing students for the rigors of college and career. Only 10% of students in the class of 2010-2011 were prepared for college after four years in high school, according to the DOE's College Readiness Index, which is well below the Citywide average of 25%. Furthermore, if Regents diplomas alone counted toward graduation—as will be the case for most students in the 2012-2013 school year—the four-year graduation rate at Sheepshead Bay would drop from 63% to just 50%, putting the school in the bottom 36% of high schools Citywide in 2010-2011.

First year credit accumulation is a key predictor of student success because students who fall behind early in high school often have trouble getting back on track to graduate. In 2010-2011, only 62% of first-year students at Sheepshead Bay earned at least 10 credits. (The Progress Report defines students earning 10 or more credits as students who earn at least 6 of those 10 credits in 3 of the following 4 subjects: Math, English, Science and/or Social Studies.) This rate of credit accumulation puts Sheepshead Bay in the bottom 11% of high schools Citywide.

- Comments 2(a), 17, 33, and 46 relate to Sheepshead Bay’s student demographics and the contention that Sheepshead Bay should be evaluated differently because of its student demographics.

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 which are matched based on incoming student characteristics, and awards additional credit based on exemplary progress with high-needs 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 English Language Learner (“ELL”) students at the school. For high 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, for accountability purposes, Sheepshead Bay is grouped in its peer group with other New York City public schools with similar student academic and demographic background.

Regarding the contention that Sheepshead Bay’s six-year graduation rate should be considered, in 2010-2011, Sheepshead Bay’s six-year graduation rate placed the school in the bottom 18% of high schools citywide, in the bottom 12% of high schools in Brooklyn, and in the bottom 4% of the schools in Sheepshead Bay’s peer group.

- Comments 1(a), 1(b), 4(c), 7, 9, 27, 30, and 32 are related to the contention that the improvements Sheepshead Bay has made due to the efforts of the current staff and administration would be jeopardized if a significant percentage of Sheepshead Bay’s current staff and administration were not hired to work at New School.

The proposal to close and replace Sheepshead Bay does not require the turnover of any set percentage of staff at Sheepshead Bay. If this proposal is approved, New School will go through a process to hire the best possible staff. Pursuant to the City’s contract with the UFT, teachers who apply to work at New School will be reviewed by a school-based Personnel Committee through the 18-D process. New School will be able to retain Sheepshead Bay’s current teachers who meet the rigorous, school-specific competencies established by the Personnel Committee, and the DOE will encourage the most effective teachers at Sheepshead Bay to join New School to anchor the school with their commitment to effective teaching and focus on student achievement. In addition, New School may have the opportunity to hire highly-qualified new teachers who will infuse new talent into the community. Thus, New School will be able to match teacher capacity to the needs of the students in a specific school. Along with structural changes that will differentiate New School from Sheepshead Bay, the possible change in staff and administration will enhance New School’s ability to best serve students.

- Comments 2(b), 6(b), 45, and 48 relate to the contention that the proposal would result in disruptions to students’ relationships to current Sheepshead Bay staff and administration, which would be detrimental to Sheepshead Bay’s students’ educational experience.

As stated above, the proposal to close and replace Sheepshead Bay does not require New School to turnover any set percentage of staff. The DOE will encourage the most effective teachers at Sheepshead Bay to join New School to anchor the school with their commitment to effective teaching and focus on student achievement. The DOE also believes that New School may have the opportunity to hire highly-qualified new teachers who will infuse new talent into the community. Thus, the DOE believes that the proposal will lead to improved educational experiences for current Sheepshead Bay students and future students at New School.

- Comments 2(c), 3, 4(a), 8, 25, 31, 36, 47, and 54(a) are related to the contention that Sheepshead Bay should continue under its current Restart model.

As stated above, in May 2011, the DOE assigned 44 of the 54 total schools designated by SED as PLA to one of four federally-approved intervention models and submitted SIG applications to SED, where appropriate. Sheepshead Bay was selected to implement the Restart model. Unfortunately, by the January 1, 2012 deadline, the DOE was unable to reach an agreement with the UFT on the integral elements of a new teacher evaluation system. In the wake of this inability to come to terms with the UFT on a teacher evaluation, SED informed the DOE that all New York City PLA schools, including Sheepshead Bay, would no longer receive SIG funding to continue the school reforms supported by either the Transformation or the Restart model. After SED informed the DOE that the Transformation and Restart models were no longer available to New York City schools, the DOE reassessed the viability of Transformation and Restart models as adequate intervention models for the PLA schools. The DOE determined that the challenges in Sheepshead Bay are too great, and the need to overcome those challenges too urgent, to not take immediate action to address key aspects of the school's culture, systems, and staffing. Consequently, the DOE concluded that a number of PLA schools, including Sheepshead Bay, should be closed and replaced with new schools. In conjunction with this proposal, the DOE submitted applications to SED to implement the Turnaround model in a number of PLA schools, including Sheepshead Bay, in order to hopefully restore SIG funds that will support Sheepshead Bay.

- Comments 10, 16, 18, and 49 contend that this proposal would negatively impact Sheepshead Bay's partnerships, successful programs, and the school's relationships to its alumni and the community. Comment 4(b) stated that elected officials are committed to helping Sheepshead Bay improve if it remains open.

If this proposal is approved, New School will be organized to offer four unique, career-based "vertical" learning communities, including a Sports Medicine and Careers pathway and a Law, Humanities, and Business pathway. Thus, programs such as the Council for Unity, and the sports medicine, the mock trial, and the moot court programs will be incorporated into the "vertical" learning communities.

The DOE will work with New School to ensure the smooth transition of all of Sheepshead Bay's existing partnerships from Sheepshead Bay to New School.

The DOE also recognizes that Sheepshead Bay has formed relationships with the community and with Sheepshead Bay alumni and alumnae. It should be noted that the goal of this proposal is to 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 DOE hopes that elected officials, the Sheepshead Bay community, and Sheepshead Bay's alumni and alumnae will support New School as they have supported Sheepshead Bay in the past.

- Comments 3 and 15 contend that there is no evidence that the Turnaround model is effective.

The immediate closure and replacement of Sheepshead Bay with New School should give students access to a higher-quality educational option while they continue to attend school in the same building. Through the 18-D hiring process for hiring instructional staff into a new school, the DOE historically has demonstrated an ability to hire high quality teaching staff into the new school and not rehire staff from the closing school who do not meet the new school's qualifications. Thus, the creation of New School will allow the Department to immediately increase the quality of teachers serving the students currently attending Sheepshead Bay. Increasing the quality of teaching through the creation of new schools has been shown to be an effective improvement strategy for New York City. In fact, in June 2010 MDRC, an independent research group, issued a report on New York City's new 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.)

The DOE has chosen this immediate replacement approach because Sheepshead Bay already has school improvement work underway. The DOE also believes that by closing Sheepshead Bay and replacing it with New School, New School could satisfy the requirements of the Turnaround model, which would make New School eligible to receive SIG funding.

- Comment 54(b) relates to the contention that the proposed closure of Sheepshead Bay has deterred parents from sending students to Sheepshead Bay, which then causes a detrimental effect to Sheepshead Bay's school budget.

Funding for the current school year is based on the October 31, 2011 audited register, which was finalized before the proposal to close and replace Sheepshead Bay High School, which was posted on February 27, 2012. Therefore, the public notice to close and replace Sheepshead Bay had no effect on the school's budget.

- Comment 20 asked whether the UFT's approval would affect whether New School would receive SIG funding.

The DOE submitted applications to SED to implement the Turnaround model in a number of PLA schools, including Sheepshead Bay, in order to hopefully restore SIG funds that will support Sheepshead Bay. The application will be evaluated and either approved or disapproved by SED, not the UFT.

- Comment 5 opposes the proposal without citing a specific reason. Comments 4(d), 11, and 53 contend that the proposal is politically motivated and not aimed at improving instruction for students.

The DOE intends to proceed with this proposal because it believes that the proposed staff, structural, and programmatic changes at New School will better serve students. The challenges in Sheepshead Bay are too great, and the need to overcome those challenges too urgent, to not take immediate action to address key aspects of the school's culture, systems, and staffing. Closing Sheepshead Bay

and replacing it with New School through the Turnaround model provides a mechanism to quickly improve teacher quality in a school, and it also calls for the implementation of programmatic supports, reforms, and strategies to substantially improve student achievement outcomes and increase high school graduation rates. Thus, this proposal is squarely aimed at improving student achievement. Furthermore, to the extent that this proposal may help secure SIG funding for DOE students, this is an educational aim, not a political one, as these resources are crucial to helping students succeed. However, even if the DOE does not receive SIG funding as a result of this proposal, the DOE believes New School will be better positioned to promote student achievement than is Sheepshead Bay, in light of Sheepshead Bay's inability to improve as demonstrated by its most recent performance data.

- Comments 2(a), 14, 21, 46, and 52 relate to Sheepshead Bay's current admissions processes and New School's admissions processes.

If this proposal is approved, all current Sheepshead Bay students who do not graduate before the start of the 2012-2013 school year will have a guaranteed seat and will be automatically enrolled in New School. This includes all ninth-, tenth-, and eleventh-grade students, as well as any twelfth-grade students who do not graduate by the start of the 2012-2013 school year.

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 New School. However, all students currently attending Title 1 schools that are in Improvement Year 2 status or worse (including PLA schools), like Sheepshead Bay, are eligible to apply for a transfer to another 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>.

Sheepshead Bay currently offers five Career and Technical Education ("CTE") programs in four career clusters. It admits students through the Citywide High School Admissions Process through both the educational option and the zoned method, under which all zoned students are guaranteed a seat. New School is planning to continue programming in all of the same CTE career clusters that Sheepshead Bay currently offers and, therefore, students enrolled in CTE programming at Sheepshead Bay will have the opportunity to enroll in CTE programming at New School. However, the zoned program at New School will give a priority to zoned students instead of a guaranteed seat. In addition, the educational option programs at New School will also give a priority to zoned students.

- Comment 51 relates to New School's organization.

Sheepshead Bay offers five CTE programs in the following four career clusters: Business Management and Administration; Health Science; Hospitality and Tourism; and Law and Public Safety. Four of the programs are in development and not yet approved by the state and one of the programs is already approved.

New School is planning to continue programming in all of the same CTE career clusters that Sheepshead Bay currently offers and, therefore, students enrolled in CTE programming at Sheepshead Bay will have the opportunity to enroll in CTE programming at New School. New School will pursue State approval of the four programs currently in development. The Office of Postsecondary Readiness will support the leadership of New School as the school works to gain

State approval for all of its CTE programs and maintain approval for the fifth program. New School is also exploring the option of adding programming in the Health Science cluster to provide more career opportunities for students at New School; however, no plans have been made yet to create a new pathway.

Pending additional planning, New School will offer four unique, career-based “vertical” learning communities – pathways that students progress through to graduation: (1) Law, Humanities, and Business; (2) Health and Science Research; (3) Sports Medicine and Careers; and (4) Arts and Media. There will be one “horizontal” learning community for incoming ninth-grade students to ensure additional support. Each of the vertical academies will enroll approximately 500 students, will continue to take advantage of the industry resources with which Sheepshead Bay already has partnerships, and continue to seek new partnerships in thematic areas. As students progress through their chosen field of study, they will participate in real world community service and internships with industry partners.

All ninth-grade students in the “horizontal” learning academy will be a full member of the “vertical” learning community they selected, while receiving additional, intensive support.

A dedicated assistant principal will be assigned to each of the five academies whose sole responsibility will be the supervision and administration of the academy. Two additional assistant principals will have school-wide responsibilities in the areas of budgeting, purchasing, data collection and analysis, safety and youth development, and overall strategic planning.

The DOE believes that this shift from a culture of teacher-centered academics to a culture of student-centered academics focused on individual student needs will benefit students. Teams of teachers who share students will work together on a daily basis to analyze formative assessments and look at student work to inform instructional practices and ensure that all students are making the necessary progress for the summative assessments.

- Comment 29 relates to New School’s name.

New School needs a name and school identification number that is different from the existing school. 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 New School. As with all school names, the Chancellor retains final decision-making authority.

- Comments 6(a), 12, 22, 23, and 44 relate to teacher staffing under Article 18-D of the UFT contract.

The 18-D process applies to all UFT pedagogical titles. The 18-D staffing process does not apply to Council of School Supervisors and Administrators or DC-37 titles. Pursuant to the City’s contract with the UFT, teachers who apply to work at New School will be reviewed by a school-based Personnel Committee. As stated above, if this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen prospective staff, including staff from Sheepshead Bay who apply to work at New School. Then, a school-based Personnel Committee will be created to screen and select teachers for New School, including applicants from Sheepshead Bay and any new applicants. It should be noted that all current Sheepshead Bay teachers are eligible to apply to work at New School. Of the most senior qualified applicants from Sheepshead Bay who meet New School’s qualifications, at least 50% must be hired. New School may fill the remainder of the positions from additionally qualified staff from Sheepshead Bay, from other schools citywide, and new hires.

Personnel Committee membership, at minimum, consists of two representatives appointed by the UFT President, two representatives appointed by the superintendent (or the Chancellor), and the principal of the new school. The Personnel Committee should strive to seek consensus in its hiring decision; however, if consensus cannot be reached, decisions are made by majority vote. The Personnel Committee will also decide what evidence will determine whether an applicant is qualified to teach at New School.

- Comment 34 concerns the financial cost of all the Turnaround proposals. Comments 6(c), 24, 50, and 54(c) relate to the contention that the DOE's proposals to close and immediately replace schools throughout the City will impose a strain on personnel and resources, including significant financial costs.

As a result of this proposal, staff in Sheepshead Bay will be excessed. Consistent with the New School hiring process, excessed staff can be hired back into the New School if they apply to the New School and are deemed to be qualified. In addition, barring system-wide layoffs, excessed teachers will be eligible to apply and be hired into other City positions, which would not create a net cost to the system. Any teachers who do not find a permanent position will be placed in the 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.

One of the comments estimated that the Turnaround proposals will cost the City \$180 million as a result of supporting excessed teachers in the ATR pool. This estimate depends upon several inaccurate and improbable assumptions: First, it assumes that 50% of the staffs in the 33 schools originally proposed will be replaced. However, the DOE has since withdrawn several proposals. Furthermore, that figure does not take into account that new schools may in fact hire back more than 50% of current staff. Second, the commenters assume 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 be in the ATR.

- Comment 35 expressed the opinion that the DOE has targeted schools for closure and immediate replacement 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.

- Comment 37 asked 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 and for which the DOE has not submitted new SIG applications to SED. This is because the DOE

believes that those schools are making sufficient improvement as they are currently structured and that closure/replacement would not assist the pace of this improvement.

- Comment 39 relates to 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 would not impact their willingness to support students in this manner. Further, New School will assist students in locating teachers who may not be employed at New School following approval of this proposal.

- Comment 40 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 Turnaround schools, contained errors regarding the hearing dates for these two schools. However, all communications with the schools themselves, the notices that were posted on the DOE's website, and the notices which were backpacked home with students, contained the correct dates.

- Comment 42 relates to the DOE's accountability for new schools.

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 is not 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 43 asked how the closure/replacement plan will produce more successful schools when the student body remains the same.

The DOE believes that the low student outcomes and underperformance of the PLA schools proposed for closure are the effect of a confluence of factors, including organizational structures, members of the school staff, and members of the school administration and leadership. However, the DOE believes that all of students are capable of high achievement, and that the replacement schools will be able to realize the potential of these students.

Again, as stated above, in fact, 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.)

- Comment 55 relates to implementation of Common Core Learning Standards.

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 Sheepshead Bay, the Common Core will be implemented in a more thoughtful and substantial way. In particular, as part of this process, New School has the opportunity to determine where there were instructional gaps in Sheepshead Bay's curriculum, and develop a plan to support teachers in implementing the Common Core Learning Standards effectively in the new school.

- Comment 56 relates to the engagement process and what part students, parents, and the community play in the process.

Last spring, the DOE 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 Sheepshead Bay was posted on February 27, 2012. The DOE solicited feedback from parents through the joint public hearings, which was held on March 28, 2012 for Sheepshead Bay, as well as through voicemail and e-mail. Parent feedback is incorporated throughout this document, which is presented to the PEP to help inform their decision about this proposal. The DOE also considered feedback received from the community in deciding whether to continue with the proposal.

The DOE also attended several meetings hosted by elected officials throughout the City. For example, the DOE attended a parent forum in Brooklyn, held at Brooklyn Borough Hall on March 12, 2012, which many community members attended. Feedback received at this forum is also incorporated throughout this document.

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

- Comment 57 suggested these proposals will result in teachers moving between PLA schools.

The guiding principle implementing the Turnaround model is to effectively match teacher capacity to the needs of the students in a specific school along with structural changes to the new school that will enhance its ability to best serve students. This means that the new replacement schools will only hire those teachers they believe will be effective and well-matched to their new missions.

The schools will accomplish this through the staffing process set forth in Article 18-D of the DOE's existing contract with the UFT, which will allow a Personnel Committee to determine the best staff for the new school. Personnel Committee membership, at minimum, consists of two representatives appointed by the UFT President, two representatives appointed by the superintendent (or the Chancellor), and the principal of the new school. The school-based Personnel Committee will

evaluate applicants' qualifications. The Personnel Committee should strive to seek consensus in its hiring decisions; however, if consensus cannot be reached, decisions are made by majority vote.

In this way, the DOE believes that only those teachers who will be most effective and qualified to teach at New School will be hired, regardless of where the teachers come from, be it from a high performing school, a struggling school, or outside of the DOE.

As stated in the EIS, current teachers from Sheepshead Bay 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 ATR pool.

- Comments 58 and 59 relate to the 18-D process.

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 60 relates to the supports that are offered to schools that implement closure and receive replacement.

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.

The 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 Networks in this work. 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 Educational Partnership Organizations (“EPOs”).

- Comment 61 relates to a question 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 Children First Networks that support each school to monitor each school’s improvement plans and progress in these plans.

The comment also asked 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 62 relates to the timeline for the implementation of the Turnaround model.

This proposal to close and replace Sheepshead Bay will be presented to the PEP on April 26, 2012. If it is approved, Sheepshead Bay will then begin the process for hiring staff into New School. New School, with its planned new elements and staff (made up of returning teachers and teachers new to the school), will open in September 2012 and will 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 each new school, please see the EISs posted here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/April2012Proposals.htm>.

The decision by SED to fund this proposal under the Turnaround model will occur in the coming months; however, to date, the Department has not received any additional detail regarding timeline for approval or rejection of its SIG application for the Turnaround model.

- Comment 63 asked 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 schools that are implementing the Restart model.

For the past several years, the DOE has supported Sheepshead Bay in order to ensure it was equipped to provide a quality education for its students.

The DOE provided leadership training, coaching, and mentoring for the principal and assistant principals to help them set clear goals for the school, including designing plans to improve instruction and developing teachers. The DOE also supported and trained teachers in classroom engagement strategies as a way to deepen instructional expectations, student interest, and classroom rigor. It also trained leadership on implementing plans in support of Citywide instructional initiatives, including implementing Common Core Learning Standards. In addition, the DOE provided support to the school staff on budgeting and human resources.

Even with these supports, however, the DOE has determined that Sheepshead Bay 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 Sheepshead Bay 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 Sheepshead Bay access to an improved faculty.

- Comment 64 and 75 relate to the measurement of the new schools' student outcomes.

Sheepshead Bay will receive its last Progress Report in fall 2012 reflecting its performance in the 2011-2012 school year; this Progress Report will not include a grade. Under the current policy, new schools in their first year receive Progress Reports with no grade. Under this policy, the new replacement school would receive an ungraded 2012-13 Progress Report. The Progress Report methodology is re-evaluated each year and this policy is subject to change.

- Comment 65 asked about the impact of the new schools and implementing 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 EIS (and Building Utilization Plan, where applicable) for the particular proposal.

- Comment 66 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 67, 68, and 69 concern JIT reviews for the schools proposed for closure and replacement.

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

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

JIT reviews are performed after the State identifies schools which are failing to make sufficient progress.

JIT reviews that were conducted during the 2010-2011 school year, including the one for Sheepshead Bay, can be found here:

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

- Comment 70 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 students, ELL students, students with disabilities, and over-age, under-credited students. For more specific information, please refer to the EIS describing the proposal.

- Comments 71 and 72 concern the availability of SIG funding.

New York City received \$58,569,883 in funding from SED for 2011-2012 to support implementation of SIG in 44 schools (19 Transformation, 14 Restart, and 11 phase out/replacements funded under the Turnaround model). As discussed in more detail in the EIS, outstanding funding for the Turnaround and Restart schools was suspended by SED 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 \$2 million per year as part the SIG 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 73 relates to the funding spent on the contracts for schools in the Restart model.

As stated above, Sheepshead Bay is in the Restart model. The DOE is currently working with six Educational Partnership Organizations ("EPO") 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 DOE is unable to gain access to SIG funding.

- Comment 74 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>.

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.