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Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of Newtown High School (24Q455) and Opening of New School (24Q366) in Building Q455 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 Newtown High School (24Q455, “Newton”), an existing district high school in building Q455 (“Q455”), located at 48-01 90th Street, Queens, NY 11373, within the geographical confines of Community School District 24. It currently serves students in grades nine through twelve. The DOE is proposing to immediately replace Newtown High School with New School (24Q366, “New School”), a new district high school which will serve students in grades nine through twelve in building Q455.

If this proposal is approved, Newtown 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 at and automatically enrolled in New School.

Newtown High School is currently the only organization in building Q455.

Newtown High School offers five Career and Technical Education (“CTE”) programs in two career clusters. Newtown High School admits students through the Citywide High School Admissions Process through the educational option, screened, audition, and zoned admissions methods.

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 Newtown High School and replacing it with New School, the DOE is seeking to expeditiously improve educational quality in building Q455. If this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen prospective staff – including Newtown 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 \$1,800,000 in supplemental federal funding under the federal School Improvement Grant (“SIG”) program. New School will build on the strongest elements of Newtown High School and incorporate new elements, including new talent,

designed to better meet student needs. Thus, the immediate closure and replacement of Newtown 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 office of Newtown High School.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building Q455 on March 17, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 350 members of the public attended the hearing, and 70 people spoke. Present at the meeting were Newtown High School School Leadership Team Representatives Jessica McDermott and Shirley Lopez; Community Education Council (“CEC”) 24 Representatives Peter Vercessi and Lamgen Leon. Queens Borough President Helen Marshall, Councilmember Daniel Dromm, and Deanna Foote on behalf of Senator Jose Peralta.

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 claimed that this proposal is a tactic aimed against the United Federation of Teachers. These commenters further claimed that this proposal is a violation of the previous agreement for Newtown to be part of the Re-start model.
3. Multiple commenters including the representative for CEC24 as well as Helen Marshall, Queens Borough President, noted that the school should be given three years to improve but was only given three months. She further requested that the commitment should be honored for the three year plan.
4. Multiple commenters claimed that Turnaround proposals are just a part of the mayor’s political agenda and do not do anything to help students.
5. Several commenters (including representatives of Newtown High School’s SLT) voiced general support for Principal Figorola, the staff, teachers and students of the school.
6. Several commenters (including representatives of Newtown High School’s SLT) noted that many people, including representatives of the DOE, have acknowledged the positive achievements of the school. These commenters asked why the school is being proposed for closure if positive achievements are taking place at the school.
7. Multiple commenters asked how Newtown will improve by bringing in teachers with whom the students have no previous relationships. These commenters further noted the high percentage of former Newtown students that are staff members at the school.
8. 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.
9. Multiple commenters disagreed with changing the name of the school.
10. Several commenters stated that the only thing that would be new about the proposed school is that 50% of the teachers would be new while the other 50% of teachers would be excessed.
11. Several commenters mentioned that Newtown alumni maintain strong connections to the school.
12. Multiple commenters stated that the school should be kept as it is and should not change.
13. Multiple commenters disagreed with the proposal due to the fact that there are a high percentage of ELL students and ELLs need more time to show improvement. Commenters further noted that Newtown High School is one of the largest ESL programs in the city.

14. One commenter is opposed to the proposal and requested that the DOE address perceived overcrowding at Newtown High School.
15. Councilmember Daniel Dromm commented that bonuses were given a few years ago to teachers for good work and now the teachers are forced to work on resumes instead of focus all the attention on students.
16. Multiple commenters mentioned the current partnerships at Newtown including the partnership with Johns Hopkins and discussed the positive impact that the partnership has had on the students at Newtown High School.
17. Several commenters noted the extra-curricular programs at Newtown including the award-winning Robotics Team and guitar program. Extra-curricular activities such as sports teams, Key Club, Arista, and Young Governors were mentioned and commenters asked if these programs would continue at Newtown if the proposal is accepted.
18. Multiple commenters said that Newtown requires additional support services including home intervention and tutoring programs.
19. One commenter asked why schools that “cheat” with the data are not being penalized while Newtown reports scores honestly and shows improvement and is penalized with a Turnaround proposal.
20. Several commenters said that the graduation rate has increased by 5% at Newtown and that the DOE should praise the school and not close it.
21. One commenter expressed concerns that a new school will not serve the ELL population with as well as Newtown. The commenter further asserted that this proposal separates the bilingual population and does not serve the needs of the community.
22. Multiple commenters stated that Newtown is an important staple in the community.
23. Members of the School Leadership Team gave a presentation which included a Power Point presentation and a student-made video. The presentation noted the increase in graduation and attendance rates over a short period of time and requested that more time in the Re-start model be given. It also noted the effective establishment of Small Learning Communities, as well as the partnerships such as John Hopkins’s Diplomas Now program. The SLT mentioned the strong culture at the school and the many student support programs and extra-curricular activities. The technology component including Smart Boards in every classroom was also mentioned. The SLT referred to the progress made with the ELL and asked how this population will be served by the new school.
24. A commenter asked why is the DOE closing Newtown when it is already part of the Re-start model.
25. A commenter asked if there is a new high school being built.
26. A commenter asked, “Where will the new incoming students go?”
27. A commenter asked, “What is the approximate class size?”
28. A commenter asked how the DOE formulated the decision to close Newtown after only having visited the school one time.
29. Multiple commenters made note of the cultural diversity at Newtown High School and asked how the new school will address the needs of the many students who are new to the country and do not speak the language.
30. One commenter asserted that there are significant fiscal costs for this plan. He noted that removing teachers and hiring substitutes will cost the city approximately 180 million dollars annually.

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

31. One commenter voiced general opposition to the Panel for Education Policy (“PEP”).
32. One commenter voiced opposition to the current mayoral administration.

33. Multiple commenters voiced opposition to the current educational reform movement.
34. One commenter expressed the belief that the feedback given at the public hearing for the Newtown proposal has no impact on the proposal or the PEP vote.
35. One commenter wants 9 out of 10 people at TWEED fired because it is a waste of taxpayers' money.
36. Multiple commenters reprimanded Deputy Chancellor Weiner for coming late to the hearing.
37. One commenter disagreed with the method with which Quality Reviews are conducted and said that the reviewers were on their cell phones during the evaluation.

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

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

38. Multiple callers expressed general opposition to the proposal and noted that the school has made progress and should remain open.
39. Multiple callers expressed their desire to keep Newtown open and not to change the school.
40. Multiple callers voiced their support of the students, teachers, and administrators at Newtown High School.
41. Multiple callers asked that the same staff and principal remain at Newtown.
42. One caller asked why the school was proposed for closure when it has significantly improved.
43. One written comment, submitted by New York Assembly Member Catherine Nolan, voiced the following:
 - a. General opposition to the proposal to close Newtown High School, and to the Turnaround model more generally.
 - b. Concern that the Restart model was not given even time to be effective.
44. One commenter asked how the closure will impact other schools and if it will cause overcrowding in local high schools.
45. One commenter expressed concerns about the effect that this sudden change will have on the students, believing that it will particularly negatively effect on the momentum of the progress made.
46. Multiple commenters noted that the school provides a positive and supportive community environment and strong school culture that helps students to succeed.
47. Multiple callers and emails made general comments against the proposal.
48. Multiple callers expressed general praise of the Robotics Team, which recently won the state competition.
49. Multiple callers opposed to the proposal noted that Newtown offers support for new immigrants learning English and culture.
50. One caller asked if the proposal is based on budget cuts and asked what school students will attend if Newtown is closed.
51. Multiple commenters are in favor of the proposal noting that they do not feel safe at school or prepared for the regents. Further, the commenters mention untrained staff in the lunchrooms.
52. Multiple callers mentioned the improvements made in graduation rates, attendance rates and Regents scores.
53. One caller mentioned that safety is a top priority at Newtown.
54. Several callers noted the extra-curricular programs and their benefits to Newtown High School.
55. Multiple callers praised the teachers and staff at Newtown.
56. One caller asked if school aides will be fired.

57. Several emails noted the long history of the school and maintained that closure will have a great impact on the community.
58. One commenter is opposed to the name change of the school.
59. Multiple commenters noted that the recent state visit was successful.
60. One commenter requests that the money being used for the Turnaround model be used to fix the physical structure of the building.
61. Multiple commenters mentioned the diverse options and course opportunities at Newtown.
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. The District 24 Community Education Council (CEC) submitted a resolution opposing the closure of Newtown, specifically stating that:
- a. Newtown High School has shown evidence of improvement in graduation and attendance rates over the past three years
 - b. current faculty and administration should be given a full chance to turn the school around under the three year RESTART model it had previously been placed on, before changing the name and staff of the school;
 - c. Newtown stands to lose a partnership with Johns Hopkins University should the Turnaround Model come into effect.
 - d. members of the Community Education Council District 24 attended a hearing and witnessed the passion of the students, staff and community in keeping Newtown open as is.
85. The Queens Borough Delegation of the New York State Senate wrote a letter opposing the closure of 8 high schools in Queens slated to be closed noting:
- a. The DOE should continue to implement Restart/Transformation at these schools as they have been showing improvement under those models.
 - b. The sudden change has left many communities confused and concerned which will have a negative impact on students' educational outcomes.
86. One commenter stated that the DOE advised CECs not to offer comment at joint public hearings.

The following written questions, comments, or remarks were submitted to the DOE and are not related to the proposal:

87. One commenter noted that there are study groups for State Regents tests.
88. One commenter mentioned that her gym clothes were stolen at school.
89. Multiple commenters mentioned the strong support of school alumni and retired teachers.

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

Comments 1, 12, 38, 39, 43(a), and 47 voice general opposition to the proposal to close Newtown High School.

As described in detail in the EIS, Newtown High School has struggled to provide a high-quality education to students. The Department is proposing to close and replace this school because it believes 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 in order to make the school an acceptable choice for current and future students. This strategy will preserve the elements of Newtown 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 students need to prepare for success in college, work, and life. Schools that have historically undergone this process have track records of setting high expectations that support student learning and achievement.

While the DOE recognizes that the school is a central element in the community and its closure and replacement will result in significant change, the DOE also believes that the benefits of

closing and replacing the school, namely the improved educational outcome of students, make the proposal the right decision for this school community.

Comments 2, 3, 24, 43(b), 84(b), and 85(a) contend that implementing Turnaround is in violation of a previous agreement to implement Restart and that the school should be given 3 years before the model is changed.

Newtown High School's most recent Progress Report was released at the end of October 2011, after the DOE's Spring 2011 decision to implement the Restart model at the school. That decision was predicated on some positive trends in student progress between 2008-2009 and 2009-2010 which led the DOE to determine that the Restart model, a relatively less intensive intervention, was the best fit for the school.

However, based on the most recent data, and feedback from members of the New York State Board of Regents that the pace of change in some Transformation and Restart schools was not quick enough to meet the challenges they faced, the DOE has concluded that students at Newtown High School would be better served by implementation of a more intensive intervention.

Moreover, as explained in more detail in the EIS, the Restart model is currently unavailable to schools in New York City.

Comments 2 and 4 state that the closure and replacement strategy is a political strategy, rather than one aimed at improving student achievement.

As stated above, the DOE believes that closing Newtown High School and replacing it with New School will provide a better educational option to current and future students. The DOE believes the proposal will catalyze student improvement more rapidly and with more certainty than previous interventions and supports, which have not led to adequate achievement. Thus, this proposal is squarely aimed at improving student achievement.

Comments 5, 40, 46, 55, and 84(d) voice general support for the students and staff at Newtown High School.

The EIS acknowledges that aspects of Newtown are working well to serve students. However, as also discussed at length in the EIS, the DOE believes that the students in this community would, overall, be better served by the new school. This proposal aims to provide a new quality option which preserves the elements of Newtown that have led to improvement, while giving the new school the ability to build upon them while accelerating the pace of change.

Comments 6, 20, 23, 38, 42, 52, 59, and 84(a) ask why Newtown is being proposed for closure if the school has demonstrated some signs of improvement.

As stated in the EIS, Newtown High School's most recent Progress Report was released at the end of October 2011, after the DOE's decision to implement the Restart model at the school. That decision was predicated on some positive trends in student progress between 2008-2009 and 2009-2010 which led the DOE to determine that the Restart model, a relatively less intensive intervention, was the best fit for the school. However, Newtown High School's metrics either declined or did not sufficiently improve during

the 2010-2011 school year. For example, on the 2010-2011 Progress Report, Newtown High School received a D in the Student Progress sub-category, down from a C in 2009-2010, and failed to improve its D grade in the Student Performance sub-category.

With respect to the school's 4 year graduation rate, graduation rates at Newtown have been consistently low for years. In 2010-2011, Newtown's four-year graduation rate (including August graduates) was 62% — below the Citywide graduation rate of 65.1% and in the bottom 32% Citywide. While this represents a 5 percentage point increase from the prior year, the school's 4 year graduation rate has remained in the 52-62% range for the last five years.

In addition, Newtown High School's Quality Review rating fell from Proficient in 2010 to Underdeveloped, the lowest possible rating, in 2011. Based on these most recent data, and feedback from members of the New York State Board of Regents that the pace of change in some Transformation and Restart schools was not quick enough to meet the challenges they faced, the DOE has concluded that students at Newtown High School would be better served by implementation of a more intensive intervention. Thus, the DOE decided to propose that Newtown High School be closed and replaced with a new school that would incorporate the strongest elements of Newtown High School, while also allowing new staff to be put in place who can accelerate the improvement in student outcomes.

Comments 7 and 10 ask how removing teachers from the school who students have existing relationships with will benefit the school community and suggest that removing 50% of the staff will be the only thing different about the new school.

The new school will implement a variety of structural and programmatic changes designed to improve student learning from the levels currently seen at Newtown High School. These structural and programmatic changes will be enabled and supported by the new school's hiring process which will allow a school-based Personnel Committee to screen and hire teachers with the specific skills and talent necessary to properly implement educational reforms. This will give all non-graduating students currently attending Newtown High School access to an improved faculty. 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 Newtown 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, 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.

Comments 8, 11 and 57 contend that the closure and replacement will negatively impact Newtown'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 Newtown 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.

Comments 9 and 58 are related to changing the name of Newtown High School.

This is a proposal to close Newtown and replace it with a new school. The new school needs its own name and school identification number (DBN). 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.

Comment 13 suggests that Newtown High School serves a higher percentage of ELLs which should be considered in the decision to close the school. The DOE notes that while Newtown High School serves a higher percentage of English Language Learners than the borough average (32% of the population at Newtown, as compared with 12% of the population in Queens), the DOE takes student population into account when evaluating a school's performance. Specifically, the progress report offers additional credit to schools achieving success with these populations. 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, Newtown is grouped in its peer group with other New York City public schools with similar student academic and demographic background.

Comment 14 is related to perceived overcrowding at Newtown High School.

Currently, building Q455 has a utilization rate of 103%. While this implies that the building is slightly overutilized, building enrollment has steadily decreased over the last five years at Newtown High School. As set forth in the EIS, the DOE projects that enrollment in the building will continue to decline slightly in future years, so that the building will be under 100% utilized by the 2013-14 school year.

Comment 15 is related to the impact of this proposal on the current teaching staff.

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

Regarding the bonuses paid to teachers in the past, the data cited in the EIS and above show that current instruction at Newtown has not led to improved student outcomes.

Comment 16, 17, 18, 23, 48, 54, and 84(c) are related to the existing extracurricular activities and partnerships at Newtown High School.

As stated in the EIS, the DOE anticipates that, if this proposal is approved, New School will partner with all of the same organizations as Newtown. In addition to traditional partnerships, as a Restart school, Newtown High School was matched with an Educational Partnership Organization (EPO), John Hopkins-Diplomas Now. Pending the availability of SIG funding, New School plans to continue this partnership. With respect to extracurricular activities, New School is expected, at minimum, to offer the same extracurricular activities and clubs now offered at Newtown High School, if not more.

Comment 19 suggests that Newtown is being penalized for its performance when other schools cheat. All schools are accountable for results and held to the same standards.

The data used in the Progress Reports and New York State accountability goes through an extensive verification and vetting process by both the school being evaluated and the DOE. Schools input their data into DOE source systems throughout the year, and have the opportunity to review and update data, subject to certain documentation requirements and system limitations, throughout the school year. At the end of the school year, schools verify the academic and demographic data of their students, and principals certify that the data is accurate for use in State accountability. DOE staff spend the summer months and the early fall reviewing the data schools provide, calculating Progress Report results, and checking and re-checking the underlying data and the accuracy of the calculations. In the early fall, schools have at least two additional opportunities to review the data used in their Progress Reports. Schools have approximately two weeks to review a preliminary file that contains all student-level results that factor into the Progress Report and demonstrate the calculations used to generate the metrics that appear in the Progress Report. Any errors found in the file may be corrected in the source systems or by request to the DOE. Schools then have approximately one week to review an "unofficial" Progress Report and updated data file, which contain the score and grade calculations in addition to the metric calculations and student-level results. Schools have the opportunity to appeal calculations or identify errors to the DOE during this time. It is only after those two rounds of vetting that the official Progress Reports are released to schools and then to the public.

Comments 21, 23, 29, and 49 ask how the new school will provide adequate support to English Language Learners.

Newtown High School currently offers ESL services and transitional bilingual programs in Spanish and Chinese. If this proposal is approved, ELL students at New School will continue to receive mandated services. New School will also offer transitional bilingual programs in Spanish and Chinese. In addition, the DOE anticipates posting a separate proposal in the coming months for the co-location of a small school focused on ELL instruction during the 2013-2014 school year. The DOE acknowledges the high percentage of ELL students currently attending Newtown and will continue to support the community's needs through programs available at both the new school replacing Newtown and the anticipated new ELL school.

Comment 22 is related to Newtown's significance in the community. The Department is proposing to close and replace this school because it believes 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 in order to make the school an acceptable choice for current and future students. As a result, the DOE believes that the new school will gain significance in the new community.

Comment 25 asked if there is a new high school being built. There is not a new building being built. This proposal is for New School to be in the same building that Newtown is currently in.

Comment 26 asked where the incoming students will go. All incoming ninth grade students who have applied to the current school and are matched to that school by the high school admissions process will be automatically enrolled in the new school if the proposal is approved.

Comment 27 asked what the class sizes will be in New School. The DOE's goals for classroom capacities differ depending on grade level. Next year, New School is expected to have class sizes similar to that of Newtown this year. However, class sizes depend on both student demand, which affects the overall enrollment of the school, and the class programming decisions made by each school's principal, both of which can change from year-to year.

Comment 28 is related to the decision making process for closing Newtown. Each year, the New York State Education Department (SED) designates a number of schools as Persistently Lowest Achieving (PLA) based on their low graduation rates or poor academic performance. Newtown High School was first designated as PLA during the 2009-2010 school year and again in the 2010-2011 school year. Each year, the DOE comprehensively reviews all of its PLA schools, with the goal of determining which intensive supports and interventions would best benefit the students in these schools. During those reviews, the DOE looks at recent historical performance and demand data from the school, consults with superintendents and other experienced educators who have worked closely with the school, and gathers community feedback.

Newtown High School has struggled to improve for several years, and its performance during the last few years confirms the DOE's assessment that the school continues to require significant intervention to improve student outcomes. The DOE believes that the most recent data support taking more aggressive action at this time by closing Newtown High School and opening New School. The new structural and programmatic elements that are part of this proposal, and the ability to quickly screen and hire staff who are able to implement those enhancements, will allow the DOE to address the core problems that have led to the poor performance highlighted below.

- Graduation rates at Newtown have been consistently low for years. In 2010-2011, Newtown's four-year graduation rate (including August graduates) was 62% — below the Citywide graduation rate of 65.1% and in the bottom 32% Citywide.
- If Regents diplomas alone counted toward graduation—as will be the case for most students in the 2011-2012 school year—the four-year graduation rate at Newtown would drop to 48%, putting the school in the bottom 31% of high schools Citywide.
- 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. Newtown earned an overall C grade on its 2010-2011 annual Progress Report, with a D grade on Student Progress, a D grade on Student Performance, and a C grade on School Environment.
- Safety issues have been a concern at the school in recent years. On the 2010-2011 New York City School Survey, only 77% of students reported feeling safe in the hallways, bathrooms, and locker rooms. In addition, only 62% of teachers reported that discipline and order were maintained at the school. This response is in the bottom 28% of high schools Citywide.
- Newtown was rated —Underdeveloped on its most recent Quality Review in 2010-2011. Quality Reviews evaluate how well schools are organized to support student learning. Newtown's 2010-2011 Quality Review cited a number of serious concerns, including the need to align resources in ways that target and support student achievement and the need to design a rigorous curriculum that connects across subjects for a coherent learning experience.

- 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 70% of first-year students at Newtown 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 Newtown in the bottom 23% of high schools Citywide.

Comment 30 contends that the turnaround proposals will cost the City \$180 million as a result of supporting excessed teachers in the ATR.

The EIS acknowledges that the proposal could lead to an increase in the number of teachers in the ATR pool, and thus an increase in cost to the city. However, the cost estimate in this comment depends upon several inaccurate or unreliable 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, the comment does not take into account that new schools may in fact hire back more than 50% of current staff. Second, the comment 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.

Comment 41 is related to the impact of staffing and asks why the same principal and teachers can't remain at the school.

This proposal would close Newtown and replace it with a new school. That new school will hire teachers pursuant to the process laid out in the UFT contract, which is described in more detail above and in the EIS. Teachers from Newtown will be able to apply for positions at the new school. The DOE's primary objective is to make the structural and staffing changes necessary to ensure the best possible student outcomes in the New School.

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 Newtown. 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 hire any set percentage of its staff from the staff of Newtown.

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 Newtown, the DOE believes that the newly screened and hired staff will be among the most important changes at the new school.

Comment 44 asks whether the proposed closure will result in overcrowding at other high schools in the borough. Queens seats eliminated by Newtown High School's closure will be recovered by the opening of New School. As a result, the proposal to close Newtown High School is not expected to yield a net loss of high school seats in building Q455 or in Queens.

Comment 51 is in support of the proposal and therefore does not require a response.

Comment 53 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 77% of students reported feeling safe in the hallways, bathrooms, and locker rooms. In addition, only 62% of teachers reported that discipline and order were maintained at the school. This response is in the bottom 28% of high schools Citywide.

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 60 asks whether the money for implementing Turnaround can be reallocated to fix the Q455 building.

SIG funding cannot be used for capital improvements to school facilities. The DOE's decisions regarding capital improvements is dependent on whether the building meets the Department's criteria for capital improvements, and on whether funds are available under the applicable Five-Year Capital Plan previously approved by the Panel..

Comment 61 is related to academic course offerings and opportunities at Newtown. The DOE's intention in proposing the closure of Newtown High School and replacement with New School is to rapidly create an improved instructional environment that incorporates the best elements of Newtown High School with new staff and new programmatic elements in a new school. Based on resources and student needs, new elements planned for New School include but are not limited to: revamped small learning communities that are better aligned to CTE programming and ninth grade admissions programs, a new instructional plan grounded in Common Core Learning Standards and data-driven instruction, a new approach to serving students with disabilities, and new structures to support more meaningful and effective professional development.

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 Newtown High School was posted on February 27th, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for Newtown was held on March 28th, 2012, as well as through voicemail and email. Parent feedback is incorporated throughout this document, which is presented to the PEP to help inform their decision about this proposal.

- The DOE also 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 the right decision for students.

Comment 64 suggests these plans will result in teachers moving between PLA schools. The guiding principle of this work is to effectively match teacher capacity to the needs of the students in a specific school along with structural changes to the new school that will enhance the its ability to best serve our students. This means that the new replacement schools will only hire those teachers they believe will be effective and well-matched to their new missions.

The schools will accomplish this through the staffing process set forth in Article 18-D of the DOE's existing contract with the United Federation of Teachers ("UFT"), which will allow a Personnel Committee to determine the best staff for the new school. The Personnel Committee consists of, at 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 teachers who will be most effective will be hired by the new schools. As stated in the EIS, current teachers from Newtown 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.
- 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 Newtown the following supports:

Leadership Support:

- Provided extensive leadership training, mentoring, and coaching for the principal and assistant principals to help them set clear goals for the school while developing the school's Comprehensive Education Plan.
- Coordinated training for school leaders to implement strategies to improve instruction, including professional development around aligning with Common Core Learning Standards and improving assessment.

Instructional Support:

- Organized and led meetings with teacher teams to improve data collection and analysis in order to identify areas in need of improvement and improve instruction.
- Provided workshops and professional development for teachers on developing lesson plans, analyzing student work to identify intervention strategies, differentiating instruction, curriculum analysis, and unit planning in order to align teaching practices with higher Common Core Standards.
- Supported teachers and staff in designing strategies for improving instruction for students with disabilities and English Language Learners, ensuring they are on track in meeting graduation requirements.

Operational Support:

- Advised school staff on budgeting, human resources, building management, and troubleshooting data systems.
- Assisted school staff with compliance issues.

Student Support:

- Trained counselors and staff in comprehensive guidance programs and evidence based counseling strategies targeted at developing and improving the capacity for social and emotional supports at the school level and at creating a safe and supportive learning environment.
- Assisted school counselors and staff in developing strategies and practices for improving student attendance and creating strategies for targeting attendance concerns.

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 Office of School Development, in 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 Newtown 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 Newtown, 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 85(b) is related to the proposal’s impact on the community.

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 Newtown 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 Newtown 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 Newtown High School access to an improved faculty.

Comment 86 contends that the DOE advised CECs not to offer comment at joint public hearings.

This is not true. In fact, the DOE worked with the CECs to confirm their attendance at the hearings, sent proposed agendas to all mandated hearing parties (including CECs), and welcomed CECs to make presentations at the hearing. Indeed, many CECs elected to make presentations. For example, CEC 27 made a presentation at the John Adams hearing, and CEC 30 made a presentation at the W. C. Bryant hearing.

The DOE received a petition opposing all 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, and described in detail in each proposal's EIS, the DOE has provided a variety of supports to the schools proposed for closure. However, the DOE has concluded that despite these supports, these schools have not improved sufficiently. As a result, the DOE 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.