



**Dennis M. Walcott**  
*Chancellor*

### **Public Comment Analysis**

Date: April 25, 2012

Topic: The Proposed Closure of William Cullen Bryant High School (30Q445) and Opening of a New High School (30Q364) in Building Q445 Beginning in 2012-2013

Date of Panel Vote: April 26, 2012

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### **Summary of Proposal**

The New York City Department of Education (“DOE”) is proposing to close William Cullen Bryant High School (30Q445, “W.C. Bryant”), an existing district high school in buildings Q445 (“Q445”) and Q949, a transportable classroom unit, located at 48-10 31 Avenue, Queens, NY 11103, within the geographical confines of Community School District 30. It currently serves students in grades nine through twelve. The DOE is proposing to immediately replace W.C. Bryant with New School (30Q364, “New School”), a new district high school serving students in grades nine through twelve in building Q445.

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

W.C. Bryant admits students through the Citywide High School Admissions Process through a screened method and also through a zoned method. The screened programs, Mentor Law & Forensic Science Institute and Math/Science Enrichment, fall under the Law and Government and Science and Math interest areas. W.C. Bryant also offers two Career and Technical Education (“CTE”) programs.

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 W.C. Bryant and replacing it with New School, the DOE is seeking to expeditiously improve educational quality on the W.C. Bryant campus. If this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen prospective staff – including W.C. Bryant staff who apply to work in the 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 the quality of teaching and learning in the school, DOE also will maximize 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 W.C. Bryant and incorporate new

elements, including new talent designed to better meet student needs. Thus, the immediate closure and replacement of W.C. Bryant 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 W. C. Bryant.

### **Summary of Comments Received**

A joint public hearing regarding this proposal was held at building Q445 on April 3, 2012. Approximately 300 members of the public attended the hearing, and 30 people spoke. Present at the meeting were W.C. Bryant School Leadership Team Representatives Doreen Lopez, Maria Hernandez, Helen Tsagalas, Sortiria Zouroudis, Cathy Yankopoulos, Linda Lefton, Phoebe Tuite, Christopher Lawrence, Sam Lazarus, and Anna Balash; Community Education Council (“CEC”) 30 Representatives Isaac Carmignani, Jennifer Harper, Ernest Brooks, and Martiza Herrera; State Senator Michael Gianaris; Assemblywoman Aravella Simotas; Councilman Jimmy Van Bramer; Carolina Gil on behalf of Assemblywoman Marge Markey; Christina Parisi on behalf of Congresswoman Maloney; and PEP representative Dmytro Fedkowskyj.

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

1. Jimmy Van Bramer, Councilman, asserted that:
  - a. W.C. Bryant has a strong history of achievement, including graduating more students than many other high schools in Queens, an increasing rate of students graduating with Regents diplomas, and high attendance.
  - b. Closing the school and firing half the teaching staff will have a negative impact on the students’ ability to learn and may hurt the graduation rate.
2. Michael Gianaris, State Senator, asserted that:
  - a. The structure of Mayoral control was said to come with performance and accountability. Mayoral control has failed and it is time to reconsider a policy that allows the DOE to close a school when the community is clearly stating that they want it to stay open.
3. Christina Parisi, a representative of Congresswoman Maloney, asserted that:
  - a. Turnaround is the most dramatic and intrusive of reform methods. The DOE should consider other, less disruptive options that will secure funding.
  - b. The reform method for this school should be collaborative and focused on professional development.
4. Costa Constatinides, District 30 Leader, asserted that:
  - a. The criteria for closing schools are not clear.
  - b. This is the second year in a row that W.C. Bryant has been slated for closure and it is disruptive to the education of students.
5. Mel Arronson, UFT representative for Michael Mulgrew, asserted that:

- a. This proposal is a result of the vindictiveness of the Mayor, and not educational policy.
  - b. The school should stay in the Transformation model, and be given the ability to focus on and implement the reform plans already in place.
6. Dmytro Fedkowskyj, PEP representative, asserted that:
- a. W.C. Bryant was to be afforded 3 years to transform under its original model, but was instead given 3 months.
  - b. He will put forth a resolution to oppose all Turnaround proposals at the April 26<sup>th</sup> PEP meeting. There should be a moratorium until public presentations are made explaining how Turnaround will improve achievement more than other models.
7. Anna Balash, SLT Chair, asserted that:
- a. The EIS made an accusation about the willingness and effectiveness of teaching staff and their response to professional development. The faculty has asked for guidance around rigor and model lessons. The staff did receive 2 professional development sessions, but they were delivered in sound bites, with no time for reflection or understanding, and with materials not aligned to a high school. These sessions were in March, days after this EIS was published.
  - b. 138 languages are spoken in Queens, and analysis of our graduation rate should take into account the additional time needed for language acquisition. Providing extended time is part of differentiation.
  - c. Closing the school is in effect punishing the school for taking on the neediest students and providing for their needs.
8. Doreen Lopez, PTA President and SLT member, asserted that:
- a. The DOE should not fire 50% of the staff, the teachers at this school are effective and established relationships with the students.
9. Cathy Yankopoulos, SLT member, asserted that:
- a. The DOE should not disturb a model that is working; W.C. Bryant creates a safe, nurturing environment. They have changed the curriculum 3 different times, which has caused confusion and problems.
  - b. The DOE suggests that these changes are necessary to receive 1.8 million in funds, but we also received these funds last year when we were given the transformation model.
  - c. It appears that this is actually about union busting, and not student achievement.
10. Sotiria Zouroudis, Student Union SLT representative, asserted that:
- a. Students want to ensure their voices are heard, as this not only affects teachers, it affects students who will be unable to return and see the teachers that have impacted their lives.
11. Sam Lazarus, SLT representative, asserted that:
- a. The Mayor has constructed a system that punishes schools like W.C. Bryant that has high numbers of students in need, ELLs and special education students. These students need more than 4 years in high school. The Mayor has created an enrollment system that encourages certain students to go to smaller schools, and pushes other students into larger schools, which creates educational apartheid.

- b. Despite its student population, W.C. Bryant has a 38% college preparedness number, which is higher than the citywide number of 30%. We also beat the city when it comes to SAT scores.
- c. The new budget system punishes schools like W.C. Bryant while rewarding new, smaller schools, which creates an uneven playing field.

12. Phoebe Tuite, SLT representative, asserted that:

- a. School has become a business. Turnaround is a standard business procedure after a takeover. It is done to remove any connection to the past, but this removes the history W.C. Bryant has had with this community for over 125 years.
- b. To designate a school as failing because not all students graduate in 4 years is new and arbitrary. Most schools do not have an 80% graduation rate. The DOE does not allow for differentiation in the graduation rates they decided must be achieved. Students that do not fit this are labeled failing, without acknowledgement of those with learning disabilities, or little grasp of the English language, who need 5 or 6 years to graduate but go on to succeed in college and life.

13. Helen Tsagalas, SLT representative, asserted that:

- a. W.C. Bryant has had difficulty because the budget has been cut every year for the past 5 years. Despite this, the school is doing more with less, and the 6 year graduation rate and 9<sup>th</sup> grade credit accumulation have improved.
- b. The school is improving independently, and does not need turnaround funds going to education companies to improve. Instead, the school needs resources and support.

14. Isaac Carmignani, CEC representative, asserted that:

- a. The community's demographics have changed over the past few years, which creates educational need that has not been taken into consideration with this proposal.
- b. The DOE should try to bring improvement without the demoralizing element of a closure.

15. Jennifer Harper, CEC representative, asserted that:

- a. There is nothing unique to the Turnaround proposal that will benefit the school.
- b. The CEC opposes placing the 8 Queens high schools in the Turnaround model and intends to read a resolution at the upcoming PEP meeting.
- c. This proposal is an act of discrimination against the neediest students. It requires replacing 50% of teachers, which has a negative effect on student achievement.
- d. This decision was made without taking into account new data, which is an act of bad faith.

16. Ernest Brooks, CEC representative, asserted that the CEC is against the plan to close these schools.

17. Maritza Herrera, CEC representative, asserted she is here to represent the students, who need her support. She hopes that the Chancellor will take the wants and needs of the community into consideration.

18. A commenter asserted that there is no one at the 33 schools that supports turnaround. Both voters and officials think it's a bad idea, but the DOE is doing it anyway. If the city government is not listening, it is no longer democracy.

19. Multiple commenters asserted that the teachers at W.C. Bryant are skilled and dedicated, and should not be fired under this proposal.
20. A commenter asserted that students cannot cope with the radical changes proposed in the Turnaround model.
21. Multiple commenters asserted that W.C. Bryant has had a dip in certain achievement statistics, but that is common to schools across the city and W.C. Bryant just needs time and resources to improve.
22. Multiple commenters asserted that the Turnaround proposal is about politics, not education. The children are being used as political pawns in an effort to avoid negotiations with the UFT.
23. A commenter asserted that the DOE has been undermining the school. The teachers are following failing DOE policies.
24. A commenter asserted that this proposal is destabilizing schools throughout the system. Many of these schools serve the neediest students.
25. A commenter asserted that the school, teachers and management are doing a great job, and Turnaround funds should be used to help the school instead of close it.
26. A commenter asserted that changing the school name would nullify all the historic items, such as jerseys etc., and take away their meaning.
27. A commenter asserted that some students spend more time at the school than they do at home, and closing W.C. Bryant will take away a much needed support system.
28. A commenter asserted that this proposal indicates a lack of respect for the students, teachers, parents and community of W.C. Bryant.
29. A commenter asserted that changing the name of the school will not change the underlying problems of the school, which stem from mayoral control.
30. Multiple commenters asserted that this hearing is just protocol, and the decision around the proposal has already been made.
31. A commenter asserted that there are 8 mayoral appointments on the PEP. The structure is hypocritical, as it is said this is to help students, but no one is listening to what the students want and need. The community needs to get legislation to end mayoral control and take the power to close schools away from the mayor and put it back with communities.
32. A commenter asserted that the proposal promises money, but when the changes are implemented, many programs and AP courses will be taken away.
33. A commenter asserted that this proposal suggests that the business model is better than a democratic model. The only reason for closing the school is that the city may qualify for funds. To close the school would be to gamble with our children's futures.
34. A commenter asserted that the softball team is undefeated and ranked 5<sup>th</sup> in the city, as a result of dedication and commitment. If the school closes their hard work will mean nothing.
35. A commenter asserted that the school was promised money and time for transformation, but the money was frozen and now they are being forced into the Turnaround model. The DOE did not give the school the chance to improve like they said they would.

36. A commenter asserted that W.C. Bryant does not counsel out students, which can have negative effect on the graduation rate.
37. Multiple commenters asserted that W.C. Bryant has been in the community for almost 125 years and represents the unique culture of Astoria.
38. Multiple commentators inquired as to why Mayor Bloomberg and Chancellor Walcott were not at the hearing and stated their belief that they should be present at the hearing.
39. A commenter asserted that teachers are facing multiple challenges in the classroom, including teenagers that are focused on electronics instead of instruction. Bringing in new teachers will not improve that situation.

The following questions were submitted in writing at the joint public hearing on April 3, 2012.

40. Will W.C. Bryant be split up into several small schools?
41. What percentage of students are English language learners and special education? What percentage will the new school have?
42. Do 50% of the teachers need to be fired?

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

43. Multiple commentators voiced general opposition to the current mayoral administration and policies that have been enacted during this administration.
44. A commenter asserted that he filed a complaint against the Mayor with the Campaign Finance Board, as he violated a finance law that is a Class A misdemeanor. If the Mayor wants to bring accountability to education, he must be accountable to the law.

The following questions, comments, and remarks were made through the dedicated phone line and email address for this proposal:

45. Multiple commenters asserted that they are against changing the name of W.C. Bryant.
46. A commenter made multiple points:
  - a. He asserted that as he plans the 50<sup>th</sup> reunion for W.C. Bryant graduates, it is obvious that the school prepared students to be successful, and there are many prominent graduates.
  - b. Changing the name of the school may create better students, teachers and structure, but it may not. The name is a symbol for tradition, familiarity, memories, and a sense of commonality for thousands of graduates.
  - c. The school should be given resources and have the opportunity to become the proud institution it once was.
47. A commenter asked what will happen to zoned children and where they will be bused to.
48. A commenter asked that the DOE remove ineffective teachers but keep the school open, as children of Astoria need a free local school to attend.

49. A commenter asserted that the city is only making the Turnaround proposal to save money.
50. A commenter made multiple points:
  - a. She asserted that the proposed closure is an attack against the unionized teaching staff at W.C. Bryant. She supports the UFT in their negotiation for a fair teacher evaluation system, and opposes the punitive disruption of school services in order to undermine the contracts the teachers have won through collective bargaining.
  - b. The EIS for this proposal gives only non-committal descriptions of programs that “may” be put in place if the school is closed, and provides no evidence that any of the proposed programs will lead to improvement in academic achievement.
  - c. The DOE’s agenda is the disruption of a functioning educational community in this neighborhood, and not the improvement of the education of our children.
51. A commenter asserted that the proposal does not explain why these objectives cannot be accomplished at the existing W.C. Bryant. Whether the reason is financial or has to do with the physical building, the DOE should provide a clear explanation detailing the positives and negatives of closing the school.
52. The DOE received a copy of a letter to Queens High School Superintendent Juan Mendez from Barbara Tutino. The letter asserted that:
  - a. Parents, students and faculty believe this proposal is a misguided, veiled corporate restructuring to reduce budgetary constraints by forcing retirements.
  - b. Accepting state and federal monies tied to unattainable, multi-layered standards of accountability does little to reform education. Any funding should be aimed at resources for students.
  - c. The DOE should consider a new curriculum that integrates technology into teaching and learning.
  - d. Questioning teacher loyalty and labeling schools/students failing sends a destructive message.
53. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
54. 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.
55. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
56. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
57. 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.
58. One commenter asked what supports are being offered to schools being closed and replaced.
59. 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).
60. One commenter asked about the timeline for the implementation of the new model.
61. One commenter asked about the supports that networks and other entities have provided to the schools that are in PLA status.
62. One commenter asked about how summer school will be implemented.
63. 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.

64. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.
65. One commenter asked about who makes up the planning team for each school.
66. One commenter asked if the state mandates a JIT review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
67. 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.
68. One commenter asked if the JIT reports are available to the public.
69. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
70. One commenter asked if rising ninth-grade students can opt out of a turnaround school.
71. 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?
72. 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.
73. One commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.
74. One commenter asked if a new school replacing a restart school can choose not to keep its EPO.
75. 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 and that it will have a negative impact students' educational outcomes.
76. One commenter contends that the DOE advised CECs not to offer comment at joint public hearings.

The DOE received petitions from Assemblywoman Aravella Simotas against closing W.C. Bryant, totaling 500 signatures.

The following questions, comments, and remarks were made through the dedicated phone line and email address for this proposal and are not relevant to this proposal:

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

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

Comments 1a, 17, 23, 25, 37, and 46a voice general support for the students and staff at W.C. Bryant, list some of the successes of the school, and voice support for the larger Astoria community. Comment 28 states that the proposal indicates a lack of respect for the school community.

The DOE acknowledges and commends the students and staff at W.C. Bryant for their hard work and successes. However, even though it is difficult for a community when a school is proposed for closure, based on the school's consistent struggles to adequately educate all of its students, the DOE believes that

the students in the W.C. Bryant community would be better served by a new school which we believe would better meet their needs.

Comments 1b, 2a, 3a, 3b, 15b, 16, 18, and 23 voice general opposition to the proposal, and general opposition to the strategy of closing schools.

The DOE notes that the schools proposed for closure and replacement, including W.C. Bryant, have struggled to provide high quality outcomes to students, and the DOE believes that closing and replacing the schools will provide a better educational option to current students rapidly. This strategy aims to provide a new quality option which preserves the elements of the existing schools, like W.C. Bryant, that have led to improvement, while giving the new schools the ability to build upon them while accelerating the pace of change. While the DOE recognizes that the school is a central element to the community and its closure and replacement is a serious cause of concern and implies a 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.

Comment 4a concerns the criteria for closing schools.

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. (The standards for the PLA designation are described in more detail below.) W.C. Bryant was first designated as PLA during the 2010-2011 school year.

Each year, the DOE comprehensively reviews all of its PLA schools, with the goal of determining what 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.

In May 2011, following the review of the 54 schools designated as PLA during the 2010-2011 school year, the DOE assigned 44 of the schools to one of the four federally-approved intervention models and submitted SIG applications to SED where appropriate. PLA schools that demonstrated the potential to improve with the supports provided for within the Transformation and Restart models were selected to implement one of those models in school year 2011-2012. Following SED’s review and approval, 19 schools were assigned to the Transformation model and 14 schools were 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 these 10 schools to support them to begin some initial improvement work and plan for more intensive intervention in subsequent years.

With respect to W.C. Bryant specifically, the DOE applied to SED to place the school into the Transformation model. SED approved the application, which made W.C. Bryant eligible for up to \$1,800,000 in SIG funding per year for three school years. However, W.C. Bryant’s continuing eligibility for these funds was conditioned upon the DOE and UFT agreeing by January 1, 2012 to implement a new teacher evaluation system. Unfortunately, by the January 1, 2012 deadline, the DOE was unable to reach an agreement with the UFT on integral elements of this new teacher evaluation system. Because of this, SED informed the DOE that all New

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

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 Transformation and Restart 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 this further consideration, the DOE concluded that a number of PLA schools, including W.C. Bryant, should be closed and replaced with new schools. By closing W.C. Bryant 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 students currently attending W.C. Bryant.

For further information, please refer to the Educational Impact Statement ("EIS"), which can be found here: <http://schools.nyc.gov/NR/rdonlyres/811AB883-1E56-49E7-A515-C9BD36AA5C2F/120401/EIS30Q445WCBryantTurnaroundvFINAL.pdf>

Comments 4b and 20 suggest that the closure process is disruptive to students, and Comments 1b, 12a, 14b, 27, and 75(b) contend that, ultimately, the closure will have a negative impact on students, families, teachers, and the larger community.

The DOE notes that the schools proposed for closure and replacement, including W.C. Bryant, have struggled to provide high quality outcomes to students, and the DOE believes that closing and replacing the schools will provide a better educational option to current students rapidly. This strategy aims to provide a new quality option which preserves the elements of the existing schools, like W.C. Bryant, that have led to improvement, while giving the new schools the ability to build upon them while accelerating the pace of change, including the ability to screen teachers and put the most effective ones—including the most qualified teachers from W.C. Bryant—in front of students. By retaining the best teachers from the existing school, there will be some continuity that minimizes the potential disruption. While the DOE recognizes that W.C. Bryant is a central element to the community and its closure and replacement is a serious cause of concern and is a 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 5a, 9c, 22, 50a, and 50c state that the proposal is about politics between the mayor and the union, rather than about educational policy, and Comment 33 states that the only reason to close the school is so that it may qualify for funds. As stated above, the DOE believes that closing W.C. Bryant and replacing it with New School will provide a better educational option to current and future students, which is expected to prompt student improvement more rapidly and with more certainty than previous interventions and supports, which have not led to adequate gains. Thus, this proposal is squarely aimed at improving student achievement. Further, to the extent that this proposal may help secure SIG funding for DOE students, this is an educational aim, not a political one, as these resources are crucial to helping students succeed. However, even if the DOE does not receive SIG funding as a result of this proposal, the DOE believes New School will be better positioned to promote student achievement than is W.C. Bryant, in light of W.C. Bryant's inability to improve quickly enough.

Comments 3a, 5b, 6a, 6b, 9a, 9b, 35, and 75(a) refer to switching the school's SIG model from Transformation to Turnaround.

As stated in the EIS, the DOE's decision to implement the Transformation model at W.C. Bryant was made in May 2011 and was predicated on some positive trends in student progress between 2008-2009 and 2009-2010 which led the DOE to determine that the Transformation model, a relatively less intensive intervention, was the best fit for the school. However, when 2010-2011 High School Progress Reports were released at the end of October 2011, the Progress Report for W.C. Bryant showed that its metrics declined during the 2010-2011 school year. Based on this most recent data, the DOE believes that students at W.C. Bryant would be better served by implementation of a more intensive intervention. This is because the data show that the school was struggling even more than the DOE had thought at the time it chose the Transformation model for the school. The DOE also received 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 faced by the school. Thus, the DOE decided to propose that W.C. Bryant be closed and replaced with a new school that would incorporate the strongest elements of W.C. Bryant, while also allowing new staff to be put in place to accelerate the pace of improvement.

When the DOE placed W.C. Bryant in the Transformation model, it hoped that it would be able to quickly reach an agreement with the UFT regarding a comprehensive teacher evaluation system. Unfortunately, that proved impossible. As a result, schools in the Transformation or Restart models were forced to enter another school year without the ability to evaluate and, if necessary, replace their staffs in a way that would best support student outcomes. Even though the DOE and UFT have recently moved closer to an agreement on evaluations, as of this date there is still no agreement in place. This creates the strong possibility that these schools will enter yet another school year with limited ability to remove ineffective teachers. Moreover, even if the DOE and UFT do reach an agreement on evaluations, it will likely take at least two years for poor performing teachers to be removed from the classroom. Given the downturn in W.C. Bryant's data discussed above, the DOE has concluded it cannot wait that long to implement the staff changes necessary to improve student outcomes.

Consequently, the DOE submitted an application to the State Education Department to implement the Turnaround model in W.C. Bryant, as a way to restore SIG funds that will support New School.

Comments 6b, 9b, 15a, 15c, and 25 concern how this proposal to close the school is connected to the Turnaround application submitted by W.C. Bryant, and the new teacher hiring process.

The DOE believes that by closing and replacing this school, New School could satisfy the requirements of the Turnaround model and receive SIG funding. If this proposal is approved, New School will go through a process – in accordance with the DOE's existing contract with the United Federation of Teachers – to hire the best possible staff including current staff and new teachers. 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 W.C. Bryant, the DOE believes that the newly screened and hired staff will be among the most important changes at New School.

The DOE's intention in proposing the closure of W.C. Bryant and replacement with New School is to rapidly create an improved instructional environment that incorporates the best elements of W.C. Bryant with new staff and new programmatic elements in a new school.

All teachers who apply to work at New School will be reviewed by a school-based Personnel Committee. The Personnel Committee will consider each candidate's teaching abilities and qualifications to contribute to a rigorous new school culture where every child is expected to succeed. While all new teachers who come into a new school environment will undergo a period of becoming acquainted with the new environment and student population, the Personnel Committee will look to hire candidates with the strongest teaching abilities and qualifications.

We will encourage the most effective teachers at W.C. Bryant 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.

If the State believes that through our proposed reform efforts that we will meet the requirements of the federal Turnaround model, it will approve our application to place New School into the Turnaround model, making New School eligible for up to \$2M per year as part the School Improvement Grant program.

Comments 7a, 13b, 21, 24, and 46c concern supports offered to the school and whether additional supports would be able to make significant improvements in the school and student outcomes, and Comment 61 asks about support given to PLA schools in the past.

For the past several years, the DOE has sought to support W.C. Bryant in order to ensure that it was equipped to provide a quality education for its students.

**Leadership Support:**

- Provided extensive leadership training, coaching, and mentoring for the principal and assistant principals to help them set clear goals for the school while developing the school’s Comprehensive Education Plan.
- Advised and coached leadership in developing an engaging and supportive school culture, including strategies to improve attendance and re-engage students who had been absent long-term.
- Coached and trained leadership on implementing plans in support of citywide instructional initiatives, including analyzing data to improve student outcomes, implementing Common Core Learning Standards, and meeting new Regents requirements.
- Supported leadership in fiscal and operational planning, including budgetary and human resources issues.

**Instructional Support:**

- Facilitated training for teachers in developing lesson and curriculum plans, analyzing data to promote student achievement and creating rigorous tasks and rubrics aligned to citywide instructional initiatives.
- Provided training for assistant principals and lead teachers to facilitate professional development aimed at improving teacher practice, allowing teachers to perform purposeful planning, improve their reflection and goal-setting, provide students with differentiated tasks, and follow best practices in analyzing student work and adapting instruction.
- Provided in-depth workshops to teachers and assistant principals to strengthen math instruction, including training on increasing the rigor of instruction, lesson planning, lesson modeling, developing literacy and writing in a math classroom, differentiating instruction, and motivating students.
- Worked with teacher teams to monitor progress of ELLs, refine curriculum to improve students’ reading comprehension, and identify interventions and strategies to help them meet graduation requirements.

**Operational Support:**

- Assisted teachers and school staff in documenting compliance with Special Education requirements.
- Advised school staff on budgeting, hiring, and building management.
- Supported school with troubleshooting of IT and data management systems.

**Student Support:**

- Supported staff in analyzing and improving attendance by tracking attendance, improving outreach to families, developing interventions for at risk students, and strengthening school culture.
- Offered professional development for teachers and counselors aimed at providing students with social and emotional supports, including training in effective classroom management, Positive Behavioral Intervention Strategies, and crisis management.

Even with these supports, however, the DOE has determined that W.C. Bryant 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 W.C. Bryant 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 W.C. Bryant access to an improved faculty.

Comments 7b, 7c, 11a, 12b, 14a, 15c, and 24 suggest that the large population of ELL students, special education students, and students with socio-emotional issues at W.C. Bryant provides a challenge to the school's overall performance.

The DOE notes that while W.C. Bryant serves a higher percentage of ELL students than the borough average (19% of the population at W.C. Bryant compared to 13% of the population in Queens), the school serves a lower percentage of students with an Individualized Education Program ("IEP") than the borough average (12% of the population at W.C. Bryant compared to 15% of the population in Queens). That said, the DOE takes student population into account when evaluating a school's performance. Specifically, the progress report offers additional credit to schools achieving success with these populations.

Overall, W.C. Bryant has a 57% 4-year graduation rate, ranking the school in the bottom 17% of high schools citywide. The DOE notes that only 63% of all first year students are earning 10+ credits, placing W.C. Bryant in the bottom 12% of all high schools citywide. Further, W.C. Bryant ranks in the bottom 3% of all high schools citywide in terms of the lowest 3<sup>rd</sup> students who are earning 10+ credits in their first year. In terms of what populations are graduating, W.C. Bryant ranks in the bottom 10% of all high schools citywide in regards to the percentage of Black/Hispanic males who are graduating. Additionally, W.C. Bryant falls in the bottom 20% of all high schools citywide based on the percentage of students with an IEP who are graduating. In regards to the percentage of ELL students who are graduating, W.C. Bryant is in the bottom 27% of all high schools citywide. This suggests that the population of students with special or greater needs are not the reason for the school's low overall outcomes; rather, W.C. Bryant is struggling with student performance across the board.

Comments 8a and 19 suggest that the EIS implies teachers are the problem, when in reality, the teachers know the current student population best and should not be excused.

The DOE does note that one of the goals of the proposal is to put in place a process aimed at hiring the best possible staff, thus improving teacher quality and, by extension, improving the quality of learning for students. However, the EIS also states that this can and invariably will include some members of the current W.C. Bryant staff. As stated above, the DOE will encourage the most effective teachers at W.C. Bryant to join New School to anchor the school with their commitment to effective teaching and focus on student achievement.

Comments 1a, 11b, 12b, 15d, and 21 concern performance at W.C. Bryant.

SED identifies high schools as PLA if their four-year graduation rate is below 60 percent for three years in a row, or if their students' performance on the English and Math Regents exams is among the lowest five percent of schools in New York State and the school's results have not improved significantly in the previous three years. W.C. Bryant was identified as a PLA school in 2010-2011 because of its consistently low four-year graduation rate.

W.C. Bryant has struggled to improve, 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 supports taking more aggressive action at this time by closing W.C. Bryant 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 W.C. Bryant have been consistently low for years. Last year, W.C. Bryant’s four-year graduation rate (including August graduates) was 57% — well below the Citywide graduation rate of 65.1% and in the bottom 17% Citywide. That represents a decline from a 60% graduation rate for the class of 2010.
- If Regents diplomas alone counted toward graduation—as will be the case for most students in the 2012-13 school year—the four-year graduation rate at W.C. Bryant would drop to just 50%, putting the school in the bottom 35% 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. W.C. Bryant earned an overall C grade on its 2010-11 annual Progress Report, with an F grade on Student Performance, a D grade on Student Progress, and a B grade on School Environment.
- W.C. Bryant was rated “Developing” (D) on its most recent Quality Review in 2010-11. Quality Reviews evaluate how well schools are organized to support student learning. W.C. Bryant’s 2010-11 Quality Review cited a number of serious concerns, including the need for teachers to strengthen their use of assessments to improve identification of key needs required for effective academic intervention and improve communication systems so that students and families are better able to assess progress and articulate next learning steps.
- 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 2010-11, only 63% of first-year students at W.C. Bryant 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 W.C. Bryant in the bottom 12% of high schools Citywide.

Comment 11c states that the new budget system favors new, smaller schools over large schools.

In New York City, all schools are funded in the same manner, through a per pupil allocation, in which funding “follows” the students and is weighted based on students’ grade level and need (incoming proficiency level and special education/ELL/Title I status). New schools are funded in the same manner. While it is true that new schools receive start-up funding, the average amount given to schools is \$34,000 per year for the first five years for high schools. These annual amounts are not even large enough to cover the salary of a first-year teacher. Thus, the DOE disagrees that this funding methodology favors small schools; in fact, larger schools should be able to take advantage of their larger enrollments to provide a full array of options and supports that their students need.

Comment 13a states that W.C. Bryant is struggling because its budget has decreased each year for five years, and yet some data points show improvement.

The DOE notes that W.C. Bryant’s enrollment has decreased over this five-year period, from 3,332 students in 2006-2007 to 2,927 during the current school year. Because schools are funded on a per-pupil basis, as described above, the school’s budget would have decreased; however, as such there would also be a proportionally smaller number of students to educate. The DOE commends the school

on its improvements, but also notes that there are several other significant measures, such as the four-year graduation rate, that have fluctuated but not increased steadily and consistently. As a result, the DOE believes that the closure and replacement of W.C. Bryant is the best intervention for the school.

Comment 18 states that no one in the school communities of the schools proposed for closure and replacement support the proposals.

While many of the comments the DOE has received from school communities have been against the proposals, there have also been several comments made in support of the proposals to close and replace the schools.

Comment 10a states that students' voices should be heard. Comment 18 also states that if the government is not listening to the communities, it is no longer a democracy. Comment 30 states that the hearing is just a protocol and the decision has already been made. Comment 54 asks about the engagement process and what part students, parents, and the community play in the process.

Last Spring, the Department held meetings to begin or continue conversations with PLA schools and their communities about the schools' performance and possible improvement strategies. In January 2012, after taking into account a number of factors, the DOE decided to implement different, more intensive interventions at some PLA schools. At that time, Superintendents and Children First Network staff met with school communities to talk about the DOE's proposal to close and replace the school.

The DOE issued proposals to close and replace the a number of PLA schools between February 27 and March 5, 2012, consistent with applicable New York State law and Chancellor's Regulations. The proposal for W.C. Bryant was posted on February 27, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for W.C. Bryant was held on April 3, 2012, as well as through voicemail and email. Parent feedback is incorporated throughout this document, which is presented to the PEP to help inform their decision about this proposal. The DOE also considered feedback received from the community in deciding whether to continue with the proposal.

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

Comments 26, 29, 45, and 46b concern changing the name of the school.

The new school needs a name and school identification number (DBN) 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 the new school. As with all school names, the Chancellor retains final decision-making authority. While the DOE understands that W.C. Bryant is an integral member of the Queens community, and that the school's name itself holds much weight, ultimately, New School will put in place a variety of structural and programmatic changes designed to improve student learning from the levels currently seen at W.C. Bryant, which we believe is a more important aim than maintaining continuity of a school name.

Comment 31 states that the structure of the PEP is hypocritical and supports ending mayoral control.

The composition of the PEP is determined by State Education Law Section 2590-b, not by the DOE. The PEP consists of 13 appointed members and the Chancellor. Each borough president appoints one member and the mayor appoints the remaining eight.

Comment 32 concerns honors/advanced placement opportunities for students at W.C. Bryant.

As discussed in the EIS, New School will establish an Honors program for higher performing students and steer them towards earning an Advanced Placement diploma. Pending availability of resources, an intensive Advanced Placement program will be established for the core subjects within New School's small learning communities in order to ensure that higher performing students are afforded an academically enriching opportunity.

W.C. Bryant currently has an extensive College Now connection with LaGuardia Community College. New School will continue this work and expand upon it by establishing new partnerships with other two- and four-year colleges to enable students to take college classes on college campuses in their senior year.

Comments 49 and 52a state that the city is only proposing to close this school to save money.

The DOE is proposing to close and replace W.C. Bryant for educational reasons, not budgetary ones. The DOE believes that closing and replacing W.C. Bryant 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 W.C. Bryant 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.

Comments 26 and 34 state that the school's athletic achievements will no longer be meaningful if the school closes.

The DOE commends the school's athletic successes. If this proposal is approved, the athletic programs currently offered at W.C. Bryant would be offered at New School. Further, all achievements noted by W.C. Bryant in the past and the current school year can continue to be honored.

Comment 36 states that the school does not "counsel out" students, which keeps its graduation rate low.

With the exception of students who leave to attend a transfer school, schools are held accountable for students who entered the school in ninth grade, including those that were later "counseled out." As a result, to suggest that W.C. Bryant is penalized compared to peer schools that may participate in this unsupported practice is incorrect – even those students who are "counseled out" would still impact schools' graduation rates.

The DOE supports W.C. Bryant's persistence with seeking to provide a quality instruction for students who are not on track to graduate. However, the DOE believes that by closing and replacing W.C. Bryant, New School will do an improved job of keeping students on track to graduate.

Comment 38 states that Mayor Bloomberg and Chancellor Walcott should have been present at the hearing.

In keeping with State Education Law Section 2590-b and the corresponding Chancellor's Regulation A-190, each hearing is presided over by a Chancellor's Designee, and for hearings concerning the phase-out or closure of a school, that Chancellor's Designee must be a Deputy Chancellor. In the case of the hearing for W.C. Bryant on April 3, 2012, the Chancellor's Designee was Deputy Chancellor Laura Rodriguez, Division for Students with Disabilities and English Language Learners.

Comment 39 states that challenges in the classroom, like students using electronics, will not improve with new teachers.

The DOE believes that while there are many challenges in order to improve student achievement, including challenges that may be specific to student behaviors at W.C. Bryant, these variables are within a teacher's control. The DOE believes that there are teachers within the school who manage these challenges and achieve superior results with their students.

Hiring the best possible staff from W.C. Bryant and new qualified teachers from outside of the school will enable the students currently enrolled in W.C. Bryant to see rapidly improved outcomes.

Comment 40 asks if W.C. Bryant will be split up into several small schools.

The DOE is proposing to replace W.C. Bryant with only one school of approximately the same size, which will provide a guaranteed seat to all current students in W.C. Bryant who have not graduated before August 2012.

Comment 41 asks what percentage of students in the school are ELLs and students with disabilities, and what percentages of these populations will be in the new school.

As stated in the EIS, W.C. Bryant's student population currently has the following demographic breakdown:

<b>Percentage of Students Receiving ICT or SC services</b>	9%
<b>Percentage of Students with Individualized Education Programs</b>	12%
<b>Percentage of English Language Learner Students</b>	18%
<b>Percentage of Students Eligible for Free or Reduced Lunch</b>	35%

The DOE anticipates, as stated in the EIS, that the new school will serve the same percentages of these populations as W.C. Bryant currently does.

Comment 42 asks if 50% of the teachers need to be fired.

No, 50% of the teachers do not need to be fired. Per Article 18-D of the DOE's collective bargaining agreement with the UFT, when a new school is created to replace a school that is being phased out or closed, the principal of the new school must develop and implement school-based competencies for hiring teaching staff. Then, a Personnel Committee is created to screen the teaching applicants for the new school using these criteria. Personnel Committee membership consists of two representatives appointed by the UFT President, two representatives appointed by the Chancellor and the principal of the new school.

The teachers in the school to be directly replaced by the new school have the right to apply and be considered for positions at the new school. In fact, if sufficient numbers of displaced staff apply, at least 50% of the new school's pedagogical positions shall be selected by the Personnel Committee from among the appropriately licensed, most senior applicants from the closing school, who meet the new school's qualifications.

Comment 47 asks what will happen to zoned students and where they will go to school.

If this proposal is approved, New School would serve the same zone as W.C. Bryant currently serves. Therefore, students currently zoned to the Q445 building for high school would continue to be zoned to the Q445 building for high school, only to the new school instead of to W.C. Bryant.

Comment 48 asks that ineffective teachers be removed, but that the school be kept open so students in the neighborhood have a free public school option close to home.

The DOE's proposal to close and replace W.C. Bryant would satisfy this commenter's request. The new school would hire only the most effective teachers from W.C. Bryant, and it would remain in the same building in Astoria, to continue to meet the community's needs.

Comment 50b concerns the commitment of the new programs which will be put in place. As stated in the EIS, New School will put in place a variety of structural and programmatic changes designed to improve student learning from the levels currently seen at W.C. Bryant. These structural and programmatic changes will be supported by 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 them. This will give all non-graduating students currently attending W.C. Bryant High School access to an improved faculty.

Based on available resources, student needs, and the availability of SIG funding, new elements planned for New School include but are not limited to: implementation of a small learning academy structure to foster more personalized and interdisciplinary learning, expanded block scheduling to foster improved teacher planning and student learning experiences, a redesigned instructional model aligned to the Common Core Learning Standards, more robust academic intervention services for students who are struggling, and an honors program that provides new opportunities for students who are excelling.

These programs were specifically designed to address the needs of the existing students and school in order to improve academic achievement at a rapid pace. For example, currently at W.C. Bryant, there is a lack of interdisciplinary, inquiry-based learning where students' critical and higher order thinking skills are developed or challenged to equip them with 21<sup>st</sup> Century skills. To address this deficiency, New School will use the small learning academy structure to engage students in an interdisciplinary curriculum aligned with the Common Core Learning Standards, by grade level, and will include a series of advanced elective courses challenging students' self-expression and problem-solving skills.

Comment 51 states that the proposal does not explain why the objectives of the new school cannot be accomplished at the existing W.C. Bryant.

This proposal allows the new school to preserve the best elements of W.C. Bryant, while instituting new elements quickly into the new school. One of these new elements is the ability to quickly staff based on teacher qualification. As stated in the EIS, if this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen prospective staff – including W.C. Bryant staff who apply to work in the 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 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. This process cannot be implemented in the existing W.C. Bryant.

Comment 51 also states that the DOE should provide a clear explanation about the positive and negative aspects of the closing school.

These positive and negative aspects of W.C. Bryant were detailed in the EIS in the "Performance and School Environment" section:

W.C. Bryant has struggled to improve, 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 supports taking more aggressive action at this

time by closing W.C. Bryant 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 W.C. Bryant have been consistently low for years. Last year, W.C. Bryant's four-year graduation rate (including August graduates) was 57% — well below the Citywide graduation rate of 65.1% and in the bottom 17% Citywide. That represents a decline from a 60% graduation rate for the class of 2010.
- If Regents diplomas alone counted toward graduation—as will be the case for most students in the 2012-13 school year—the four-year graduation rate at W.C. Bryant would drop to just 50%, putting the school in the bottom 35% 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. W.C. Bryant earned an overall C grade on its 2010-11 annual Progress Report, with an F grade on Student Performance, a D grade on Student Progress, and a B grade on School Environment.
- W.C. Bryant was rated “Developing” (D) on its most recent Quality Review in 2010-11. Quality Reviews evaluate how well schools are organized to support student learning. W.C. Bryant's 2010-11 Quality Review cited a number of serious concerns, including the need for teachers to strengthen their use of assessments to improve identification of key needs required for effective academic intervention and improve communication systems so that students and families are better able to assess progress and articulate next learning steps.
- 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 2010-11, only 63% of first-year students at W.C. Bryant 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 W.C. Bryant in the bottom 12% of high schools Citywide.

Despite a number of challenges the school has faced, some data indicates that elements of W.C. Bryant are worth preserving in New School.

- W.C. Bryant appears to be having some success in graduating students in self-contained classrooms. 30% of self-contained students with disabilities graduated in four years, putting W.C. Bryant in the top 31 percent Citywide for self-contained students. The DOE will seek to preserve W.C. Bryant’s efforts to support these students in the new school, while implementing new supports to assist other student populations who continue to struggle at W.C. Bryant, including students in Special Education Teacher Support Services (“SETSS”) classrooms, English language learners (“ELLs”), and other student populations.
- While credit accumulation at W.C. Bryant is low overall, its students’ Regents exam outcomes indicate some success in specific subjects. As measured by the weighted Regents pass rate, W.C. Bryant is showing relative success in helping students to pass the science Regents exam, with a weighted pass rate that places the school in the top 25% of schools citywide. Student results in other subjects are not showing similar levels of achievement. The DOE will seek to preserve W.C. Bryant’s more effective instructional programs in the new school, while also implementing new programs to improve instruction in other subjects.
- Attendance rates at the school remain relatively strong, indicating students continue to come to school eager to learn. Improving instruction and school organization at the new school could result in increased learning for the many students currently attending W.C. Bryant each day.
- While the school’s overall Quality Review score was “Developing,” the Review indicated some areas of strength, such as several strategic administrative decisions that support school goals for improved academic outcomes and providing a safe and supportive learning environment that supports students’ academic engagement and social-emotional well-being. With new staff, structural, and programmatic changes, we expect that New School will be able to effectively leverage these areas of strength while improving student outcomes for all students.

Comment 52b states that accepting grant money tied to unattainable standards does not improve education. The DOE disagrees that the standards set as part of the SIG models are unattainable, and therefore also believes that additional funding can only help increase the pace of improvement towards those goals.

Comment 52b also states that funding should be aimed at resources for students. Any SIG funding received if the Turnaround application to the state is approved would all be used at the school level to directly support students.

Comment 52c states that the DOE should consider a new curriculum that integrates technology into teaching and learning.

A new curriculum that integrates technology into teaching and learning is already one element described in the plans for the new school in the EIS, and the DOE supports this work that the new school will be doing.

Comment 52d states that this proposal sends a destructive message to teachers and students.

The DOE recognizes that closing a school is a difficult experience for students, staff, and community members. Additionally, it is important to note that decisions around the future of a school in no way reflect on the students who attend the school. The DOE, rather than students, are responsible for the quality of a school. Whenever the DOE makes the decision to move forward with a proposal to phase out a school, it does so because students deserve a better option.

Comment 53 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 55 suggests these plans will result in teachers moving between PLA schools. The guiding principle of this work is to effectively match teacher capacity to the needs of the students in a specific school along with structural changes to the new school that will enhance its ability to best serve our students. This means that the new replacement schools will only hire those teachers they believe will be effective and well-matched to their new missions, regardless of where these teachers come from.

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 the following five representatives at minimum: 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 W.C. Bryant 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 56 and 57 ask about past implementation of the 18-D process, and specifically which schools have done this successfully, how, and what measurements of success were used. As described above, the hiring process for new schools replacing a closing/phasing out school is implemented according to Article 18-D of the existing contract between the DOE and the UFT.

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

Since 2002, the DOE has opened approximately 200 new high schools as replacements for high schools that have been phased out or closed. Each of these new schools has hired its teachers through the 18-D process. As a group, these new schools have outperformed the schools they have replaced.

Below are a few examples:

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

campus are graduating 75.8% of students in 2010, a 35 percentage point increase over the closed school.

Comment 58 asks about the supports offered to the existing and 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.

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

Comment 59 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 60 asks about the timeline for implementation of this proposal.

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

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

Comment 62 asks how summer school will be implemented.

Summer school will continue to be implemented as in years past. Each year, a number of school buildings host summer school programs. Individual schools choose to affiliate to a particular building for summer school

opportunities for their students, which may mean offering their own programs for their students, offering a summer school program in partnership with other schools.

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

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

Comment 63 asks about measurement of the new schools' student outcomes.

W.C. Bryant will receive its last Progress Report in fall 2012 reflecting its performance in the 2011-2012 school year; this Progress Report will not include a grade. Under current policy new schools in their first year receive Progress Reports with no grade. Under this policy, the new replacement school would receive an ungraded 2012-2013 Progress Report. The Progress Report methodology is reevaluated each year and this policy is subject to change.

Comment 64 asks about the impact of the new schools and the closure/replacement approach.

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

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

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

Comment 65 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 66, 67, and 68 concern JIT reviews for the schools proposed for closure and replacement.

JIT reviews are performed after the state identifies schools which are failing to make sufficient progress. As mandated by state regulation, SED works with the DOE to conduct JITs for schools that become newly identified into one of the following categories:

- Restructuring, Year 1
- Restructuring, Advanced

- Persistently Lowest Achieving

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

[http://www.p12.nysed.gov/accountability/School\\_Improvement/Reports/1011/1011JIT.html](http://www.p12.nysed.gov/accountability/School_Improvement/Reports/1011/1011JIT.html). JIT reviews conducted during the 2009-2010 school year, such as the one for W.C. Bryant, may be obtained from the District Superintendent's Office or Elizabeth Iadavaia, Senior Director of School Improvement, at [Eiadava@schools.nyc.gov](mailto:Eiadava@schools.nyc.gov).

Comment 69 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 70 asks about whether rising ninth graders can opt out of the replacement school.

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

As indicated in the EISs, students who listed a school proposed for closure on their high school admissions applications had the opportunity to submit a new application during Round Two. Schools with available seats as well as some new high schools designated to open throughout the City for the 2012-2013 school year were available for these students to consider in that round. If a student already received a match in Round One (whether to a school proposed for closure, or any other school), that match will be nullified if the student receives a Round Two match, which are issued at the end of April.

In addition, all students in non-terminal grades who currently attend Title 1 Schools in Need of Improvement ("SINI") Year 2 status or worse (including PLA schools), such as W.C. Bryant, 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 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 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 76 stated that CECs had been advised by the DOE 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.

Comments 43, 44, 73, 74, and a portion of Comment 61 do not directly relate to the proposal and do not require a response.

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.