Department of Education

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Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of M.S. 142 John Philip Sousa (11X142) and the Opening and Co-Location of New School (11X578) with One World Middle School at Edenwald (11X529) and Baychester Middle School (11X532) in Building X142 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 M.S. 142 John Philip Sousa (11X142, "M.S. 142"), an existing district middle school in building X142 ("X142" or "John Philip Sousa Campus"), located at 3750 Baychester Avenue, Bronx, NY, 10466, in Community School District 11. It currently serves students in grades six through eight. The DOE is proposing to immediately replace M.S. 142 with New School (11X578, "New School"), a new district middle school that will serve students in grades six through eight in building X142.

If this proposal is approved, M.S. 142 will close at the conclusion of the 2011-2012 school year. All current students who have not been promoted to high school before the start of the 2012-2013 school year will be guaranteed a seat and automatically enrolled in New School.

M.S. 142 is co-located in X142 with One World Middle School at Edenwald (11X529, "One World"), an existing district middle school that is phasing in that currently serves students in sixth grade and will serve students in sixth through eighth grades at scale, and with Baychester Middle School (11X532, "Baychester"), an existing district middle school that is phasing in that currently serves students in sixth grade and will serve students in sixth through eighth grades at scale. A "co-location" means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias. In addition, the John Philip Sousa Campus houses three community-based organizations ("CBOs") that operate in the school building: Montefiore Medical Group, Sports and Arts, and Beacon.

All three schools—M.S. 142, One World, and Baychester--admit students through the District 11 Middle School Choice Process and offer priority to students residing in the X142 zone through a campus choice, unscreened admissions method.

One World and Baychester were opened and co-located in X142 in September 2011 pursuant to an EIS that was approved by the Panel for Educational Policy ("PEP") on March 1, 2011. As noted in that proposal, enrollment at M.S. 142 was reduced beginning in September 2011 by limiting the number of

students admitted to its incoming sixth grade, and the two new schools were created to meet the needs of the X142 school zone and improve educational quality on the campus. The proposal can be found on the DOE's Web site at: http://schools.nyc.gov/NR/rdonlyres/50D0EA27-11B7-4F3C-9E53-4ACED95E34C6/0/EIS_NewSchools142_final.pdf.

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 M.S. 142 and replacing it with New School, the DOE is seeking to expeditiously improve educational quality on the John Philip Sousa Campus. If this proposal is approved, New School will develop rigorous school-specific competencies to measure and screen prospective staff—including M.S. 142 staff who will apply to work at New School.

Based on these criteria, and in accordance with the staffing requirements in Article 18-D of the DOE's existing contract with the United Federation of Teachers ("UFT"), New School will put in place a process aimed at hiring the best possible staff, thus immediately improving teacher quality and, by extension, improving the quality of learning. New School plans to develop new programs and school supports that are intended to improve student outcomes. By doing this important work to improve the quality of teaching and learning in the school, the DOE will maximize New School's chance of receiving up to $2,000,000 per year in supplemental federal funding under the federal School Improvement Grant ("SIG") program.

New School will build on the strongest elements of M.S. 142 and incorporate new elements, including new talent designed to better meet student needs. Thus, the immediate closure and replacement of M.S. 142 with New School should give students access to a higher-quality educational option while they continue to attend school in the same building.

The details of this proposal have been released in an EIS which can be accessed here: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/April2012Proposals.htm.

Copies of the EIS are also available in the main offices of M.S. 142, One World, and Baychester.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building X142 on April 19, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 35 members of the public attended the hearing, and 3 people spoke. Present at the meeting were Deputy Chancellor Kathleen Grimm; M.S. 142 School Leadership Team ("SLT") representatives Tollyne Dickerson, Susanne Mauro, and Interim Acting Principal LaJuan White; Baychester SLT representatives Janelle Todman and Principal Shawn Mangar; One World SLT representatives Kerry Smith and Principal Patricia Wynne; Community Education Council ("CEC") 11 President Petra Poleon; Kevin Riley, Consitiuent Liaiason for Assemblymember Carl E. Heastie; and Stephen Bennett, Council of School Supervisors and Administrators ("CSA") Representative.

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

1. Stephen Bennet, Bronx Field Director for the CSA, stated:
    a. Closure of these schools is only a political maneuver, and there is nothing educationally sound about the plan.
    b. The only thing new about the proposed new schools are that half of the teachers will be fired.
    c. This plan will not contribute to sound teacher evaluations.

   d. This plan will cost the city $1.8M yearly by putting so many teachers in the Absent Teacher Reserve ("ATR") pool.
2. A former teacher at the school stated that she does not believe changing the teachers in the school creates a new school. The commenter asked how the curriculum and resources will be different as a result, and stated that this proposal will not actually change anything about the education at the school.
3. One question submitted asked why the school is closing immediately, rather than phasing out, which would have allowed students in sixth and seventh grades to graduate from M.S. 142.
4. One question submitted asked why the DOE would want to replace half of the teachers who are already familiar with the school's children.
5. One question submitted noted that Deputy Chancellor Grimm spoke about the low number of children reading at grade level during her proposal summary and asked if the children at elementary schools who feed into M.S. 142 are reading at grade level.
6. One question submitted asked if the school is failing with the current group of teachers, why would the DOE retain any of them in the new school.
7. One question submitted asked if the DOE can guarantee that the new school will perform better than M.S. 142.

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

8. One commenter, the treasurer of the M.S. 142 SLT, commented that there were more teachers than parents at the hearing. Also, seemingly in reference to a proposal that was approved by the PEP during the 2010-2011 school year and implemented for 2011-2012, he asked about the benefit of opening three different schools in place of M.S. 142.

<u>Summary of Comments Received at other public meetings</u>

An information session was hosted by the Bronx Borough President at the Morris Educational Campus on March 15, 2012. The DOE attended that meeting to provide information to community members and answer questions.

<u>The following questions, comments, and remarks were made at the meeting:</u>

9. One commenter asked about the requirements for leadership change pursuant to the Turnaround model.
10. One commenter asked about the procedure for new schools to select the networks that will support them.

<u>The following questions, comments, and remarks were made at the meeting and are not relevant to the proposal:</u>

11. One commenter asked about SIG funding in relation to Educational Partner Organizations ("EPOs"). Specifically, since there are no EPOs in Turnaround, who gets the equivalent money given to EPOs in restart, and who agreed to keep on the EPOs for these schools?

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

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

12. One comment, submitted by New York Assembly Member Catherine Nolan, expressed the following:
    a. General opposition to the proposal to close M.S. 142, and to the Turnaround model more generally.
    b. Concern about the effect that this sudden change will have on the students, believing that it will particularly negatively affect outgoing eighth-grade students and incoming sixth-grade students.
    c. The proposal to close the school, as well as the general announcement that it could be closed, will negatively impact the school and decrease student enrollment.
    d. Transformation is intended to be a long-term plan over three years, and five months of work will be wasted.
13. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
14. 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.
15. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
16. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
17. 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.
18. One commenter asked what supports are being offered to schools being closed and replaced.
19. 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).
20. One commenter asked about the timeline for the implementation of the new model.
21. One commenter asked about the supports that networks and other entities have provided to the schools that are in PLA.
22. One commenter asked about how summer school will be implemented.
23. 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.
24. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.
25. One commenter asked about who makes up the planning team for each school.
26. One commenter asked if the state mandates a Joint Intervention Team ("JIT") review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
27. 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.
28. One commenter asked if the JIT reports are available to the public.
29. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
30. One commenter asked if rising ninth-grade students can opt out of a Turnaround school.

31. 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?
32. 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.
33. 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.
34. One commenter asked if the DOE will have to repay the funding spent on the contracts for Restart schools.
35. One commenter asked if a new school replacing a Restart school can choose not to keep its EPO.
36. 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.

37.

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

Comment 1(a) states that the closure and replacement plan is political, rather than educational, and Comment 1(c) states that this proposal will not advance the negotiations for a teacher evaluation system. Comment 12(a) expresses general opposition to the proposal and the Turnaround model, Comment 12(a) questions the decision to switch from the Transformation model which was intended to be a long-term plan, and Comment 24 asks about the impact of this 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.

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 can support student success. 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 M.S. 142, in light of M.S. 142's inability to quickly improve. The proposal does not aim to advance the negotiations for a teacher evaluation system.

For more specific information regarding the anticipated impact of a proposal, please refer to the EIS.

Comment 1(b) states that the only new thing about the proposal would be the staffing change, and Comment 2 states that changing the teachers does not in itself create a new school and asks what will be different instructionally and programmatically. On the contrary, the EIS details a number of new elements planned for New School based on available resources, including but not limited to: the creation of grade level academies with their own identities and end of year benchmarks and activities; a new advisory program and school schedule geared to increasing student engagement and attendance; and a more comprehensive system for developing teachers and teacher leaders to ensure staff is prepared to meet the needs of each student.

Comment 1(d) concerns the cost of the increase in teachers in the ATR pool as a result of this proposal. The estimate described depends upon several inaccurate and improbable assumptions: First, it assumes that 50% of the staffs in the 33 schools originally proposed will be replaced. However, the DOE has since withdrawn several proposals. Furthermore, the comment does not take into account that new schools may in fact hire back more than 50% of current staff. Also, 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; these staff members will not join the ATR pool or represent a cost to the DOE.

Comment 3 asks why the school is being closed and replaced immediately, rather than being phased out gradually. The DOE believes that this proposal will give current students immediate access to a higher-quality educational option, and that this proposal is appropriate for M.S. 142 given that the school already has improvement work underway. This will allow the new school to retain the best elements of M.S. 142 while adding many new elements very quickly, to combine with the aim of creating significantly improved outcomes for current and future students.

Comment 4 questions the benefit of replacing teachers who are familiar with the school's children. The DOE acknowledges that relationships can be instrumental in supporting the academic outcomes of students. However, students are in classes with new teachers yearly, whether or not a proposal like this is in place. Moreover, while comfort can be important, the DOE believes that the most important thing is that the most effective teacher is in front of each classroom, whether or not the teacher has been in the school before. Finally, the DOE anticipates that any teachers new to the school would work diligently to create familiarity and relationships with students and their families.

Comment 5 asks about students' entering proficiency levels at the school and implies this is the cause of the low student performance at M.S. 142. While it is true that the average proficiency of students entering M.S. 142 as new sixth-grade students is 2.67, which is below the mark of proficiency which is 3, many middle schools have students with loweror comparable entering proficiency levels, but achieve markedly better outcomes for their students. For example, the School for Social Inquiry and Justice, a middle school in District 8, has an entering proficiency of 2.76, but the school has an A on its 2010-2011 Progress Report, with an A grade in the Progress sub-section, and B grades in the Performance and Environment sub-sections; the school was not designated as a PLA school. This is compared to M.S.

142's C grade overall, with a B grade on the Progress sub-section and D grades on the Performance and Environment sub-section, and the fact that it is a PLA school.

Comment 6 asks if the school is failing with the current teachers, why rehire them in the new school, and Comment 15 suggests these plans will result in teachers moving between PLA schools.

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 50% 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. It should strive to seek consensus in its hiring decisions; however, if consensus cannot be reached, decisions are made by majority vote.

Any remaining teacher vacancies will then be filled by the Personnel Committee from applicants from the existing teacher pool, or as with all new district schools, if the school is unable to find sufficiently qualified applicants from within the existing teacher pool, the school will be provided an exception to hire up to 40% of its teaching positions from outside of the current teacher pool.

Barring system-wide layoffs, excessed teachers will be eligible to apply for other City positions, and any teachers who do not find a permanent position will be placed in the ATR pool, 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.

Comment 7 asks if the DOE can guarantee that the new school will perform better than M.S. 142. While this cannot be guaranteed, the DOE has a strong record of improvement in closure and phase-out replacements. The plan for the new school, which includes screening the staff as well as several elements new to the instructional and programmatic aspects of the school, all suggest that the new school will be better poised to improve outcomes quickly for current students.

Comment 9 asks about requirements for leadership change under the federal Turnaround model. In this model, if a principal has been in his or her role fewer than three years, then the principal may become the principal of the proposed new school, subject to a waiver by SED. If the individual has served as principal at the school for over three years at the time of the school's initial implementation of a SIG model, then the Turnaround model requires that he or she must be replaced.

Comment 10 asks about how new schools select networks. During the spring, new schools and networks have opportunities to learn about one another, after which new schools are asked to request networks (this occurs during at the same time as any requests from existing schools to change networks). Final decisions about school and network matches are expected in May.

Comment 12(b) relates to the social and emotional impact of a potential school closing on the school. The DOE recognizes that closing a school is a difficult experience for students, staff, and community members. In addition, the DOE understands the important role that schools play in their communities and knows that schools throughout the city are not just educational institutions, but rich and tight-knit communities. The DOE expects that New School will be fully engaged with the community and will continue to play a vital role as an anchor for the community.

If this proposal is approved, New School will receive supports to ensure a smooth transition including, but not limited to:

- Helping the school provide students with options that support their advancement and fully prepare students for their next transition point.
- Working with school staff to foster a positive culture.
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

Additionally, it is important to note that decisions around the future of a school in no way reflect upon the students who attend the school, as it is the DOE, not the students, that is responsible for the quality of a school. Whenever the DOE moves forward with a proposal to close a school, it is because students deserve a better option.

Comment 12(c) states that the labeling of the school as PLA and this proposal itself will cause the school's enrollment to decrease, as parents will not to want to send their children to the school. The DOE acknowledges that schools labeled PLA by the state have an additional obstacle for recruiting students. However, the DOE anticipates that replacing the PLA-designated school with New School, with its new elements aimed at rapidly improving student achievement, will actually be helpful in increasing student interest.

Comment 13 asks about delays in implementation of Common Core Learning Standards ("Common Core") as a result of these proposals. This proposal will not delay the implementation of the Common Core into curriculum and classroom instruction. Moreover, 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 effectively in the new school.

Comment 14 asks about the engagement process and what part students, parents, and the community play in the process. Last Spring, the DOE held meetings to begin or continue conversations with PLA schools and their communities about the schools' performance and possible improvement strategies. In January 2012, after taking into account a number of factors, the DOE decided to implement different, more intensive interventions at some PLA schools. At that time, Superintendents and Children First Network staff met with school communities to talk about the DOE's proposal to close and replace the school.

The DOE issued proposals to close and replace 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 M.S. 142 was posted on March 5, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for M.S. 142 was held on April 19, 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.

The DOE also attended several meetings hosted by elected officials throughout the City. For example, the DOE attended a parent forum in the Bronx, held at Morris Educational Campus on March 15, 2012,

which many community members attended. Feedback received at this forum is also incorporated throughout this document.

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

Comments 16 and 17 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 18 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 19 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 19 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 20 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.

Comment 21 asks about support given to PLA schools in the past.

For the past several years, the DOE has sought to support M.S. 142, in order to ensure that it was equipped to provide a quality education for its students.

Leadership Support:

- Provided leadership training for the principal and assistant principals to help them set clear goals for the school while developing the school's Comprehensive Education Plan and Language Allocation Plan.
- Coached and trained leadership on implementing plans in support of citywide instructional initiatives.
- Supported leadership and staff in generating meaningful strategies for improving the quality of classroom visitations and instructional feedback, as a way to improve teacher practice and improve student outcomes.
- Provided ongoing professional development for Special Education support of Compliance Assurance Plan designated by SED.
- Organized teacher teams to provide specialized support for ELLsand ensure they meet promotion standards.

Instructional Support:

- Trained leadership on implementing plans in support of citywide instructional initiatives, including the Common Core Learning Standards.
- Supported and trained teachers in classroom engagement strategies as a way to deepen instructional expectations, student interest, and classroom rigor.

- Supported the school in assessment design, curriculum mapping, and student feedback as tools aimed at meeting the necessary standards and expected student outcomes.
- Offered training for staff on successful ways to assess student progress through rigorous tasks, and how to use the information to inform and improve teacher practice.

Operational Support:
- Advised school staff on budgeting, human resources, teacher recruitment, and building management.
- Supported school staff on developing strategies and practices for improving student attendance and creating strategies for targeting attendance concerns.
- Provided ongoing training and technical assistance to all operational support staff on all operational issues and procedures.
- Supported school staff in Special Education compliance issues, including timely writing of Individualized Education Programs, alternative assessments, and other supports and strategies for improving instruction and plans for students with disabilities.

Student Support:
- Trained the School Based Support Team 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.
- Facilitated comprehensive supports to review disciplinary and procedural protocols targeted at improving the school learning environment and impacting student outcomes.
- Provided ongoing check-ins with the Parent Association
- Provided ongoing Beacon Program Check-ins.
- Yearly Achievement Reporting and Innovation System ("ARIS") Parent Link Training.

PLA schools have also been supported by their Children First Networks.

Even with these supports, however, the DOE has determined that M.S. 142 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 M.S. 142 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 M.S. 142 access to an improved faculty.

Comment 22 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 23 asks about measurement of the new schools' student outcomes. M.S. 142 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 2012-13 Progress Report, which will include some early measures of student outcomes. The Progress Report methodology is reevaluated each year and this policy is subject to change.

Comment 25 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 26, 27, and 28 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 required for such newly identified schools. JITs that were conducted during the 2010-2011 and 2011-2012 school years may be found at http://www.p12.nysed.gov/accountability/School_Improvement/JITReports.html. JIT reviews conducted during the 2009-2010 school year, such as the one for M.S. 142, may be obtained from the District Superintendent's Office or Elizabeth Iadavaia, Senior Director of School Improvement, at Eiadava@schools.nyc.gov

Comment 29 concerns whether the new school will serve over-the-counter ("OTC"), 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 OTC students, ELL students, students with disabilities, and over-age, under-credited students. For more specific information, please refer to the EIS.

Comment 30 asks about whether rising ninth-graders can opt out of the replacement school. This proposal concerns incoming sixth-graders. 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 District 11 Middle School Choice applications had the opportunity to submit a new application to their guidance counselors this spring, after the posting of this proposal.

In addition, all students in non-terminal grades who currently attend Title 1 Schools in Need of Improvement ("SINI") Year 2 status or worse (including PLA schools), such as School M.S. 142, 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.

Comment 31 and 32 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 of the SIG program. However, the challenges in these schools are too great, and the need to overcome those challenges is too urgent, to not take immediate action to address key aspects of the school's culture, systems, and staffing, whether or not SED ultimately authorizes funding.

Comment 36 refers to signed by approximately 1,300 people opposing the proposals to close and replace schools. As stated earlier, the DOE has provided several supports to the schools in question, but believes only their closure and replacement will accelerate the pace of change needed to achieve the desired improvement for current students in these schools.

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

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

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

Changes Made to the Proposal

No changes have been made to this proposal.