



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of Flushing High School (25Q460) and Opening of New School (25Q363) in Building Q460 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 Flushing High School (25Q460, “Flushing”), an existing district high school in building Q460 (“Q460”), located at 35-01 Union Street, Flushing, NY 11354 within the geographical confines of Community School District 25. It currently serves students in grades nine through twelve. The DOE is proposing to immediately replace Flushing with New School (25Q363, “New School”), a new district high school serving students in grades nine through twelve in building Q460.

If this proposal is approved, Flushing 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.

Q460 also houses a Young Adult Borough Center (“YABC”) program, an Alternate Learning Center (88Q994, “ALC”) that students attend while they are suspended from school, and a Learning to Work (“LTW”) Program. The DOE anticipates relocating this ALC from Q460 before the beginning of the 2012-2013 school year.

Flushing admits students through the Citywide High School Admissions Process through the educational option and zoned admissions methods. Flushing also offers three 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 Flushing and replacing it with New School, the DOE is seeking to expeditiously improve educational quality in building Q460. If this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen prospective staff – including Flushing staff who apply to work at New School. Based on these criteria, and in accordance with the staffing requirements in Article 18-D of the DOE’s existing contract with the United Federation of Teachers (“UFT”), New School will put in place a process aimed at hiring the best possible staff, thus immediately improving teacher quality and, by extension, improving the quality of learning. New School plans to develop new programs and school supports that are intended to improve student

outcomes. By improving the quality of teaching and learning in the school, DOE also will increase New School's chance of receiving up to \$1,800,000 in supplemental federal funding under the federal School Improvement Grant ("SIG") program. New School will build on the strongest elements of Flushing and incorporate new elements, including new talent, designed to better meet student needs. Thus, the immediate closure and replacement of Flushing 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 Flushing.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building Q460 on April 18, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 380 members of the public attended the hearing, and 60 members of the public spoke. Present at the meeting were Deputy Chancellor David Weiner, Flushing principal Carl Hudson; Flushing School Leadership Team representatives Jessica Dimech, Susan Sgambati, John Doherty, Jr., Patricia Cuti, Agata Weudorayh; Council Member Daniel J. Halloran III, Council Member Peter A. Koo, Mike Favilla representing State Senator Toby Ann Staviskey, Emily Paez representing State Senator Jose Peralta, Aida Morel representing State Assembly Member Grace Meng, Dmytro Fedkowskyj, Queens Borough President appointee to the Panel for Educational Policy (PEP), Jaya Patil, Member of Community Education Council District 25.

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

1. Council Member Halloran stated
 - a. he was upset about closing a school that is an institution in the community. He does not support school closures.
 - b. Splitting schools into multiple schools in a single building is simply adding bureaucracy, and spending more money in the same building, and that is not an efficient use of funding.
 - c. The DOE has restructured multiple times and has brought different agendas.
 - d. The Capital Plan does not have any new seats in his district even though all the schools are overcrowded.
 - e. He asserts that parents and CECs have been shut out of the process.
2. Council Member Peter Koo stated that Flushing is in his district and he knows this community well. He asks the Mayor and DOE not to close this school.
 - a. This school has produced productive alumni that are business leaders across the country and around the world.
 - b. There should not be the same expectations for this school as for other schools because of the high percentage of ELLs and students with special needs.
 - c. He hopes to keep the school open so staff can continue their work and students will know where they are going next year.

- d. The DOE promised the school three years for it to turnaround, but the school has not been given this time.
3. Dmytro Fedkowskyj, the Queens Borough President's appointee to the PEP, stated that
 - a. the Queens Borough President opposes the closure of the school and the turnaround model.
 - b. Flushing was founded in 1875, and was the only public school in New York City at that time.
 - c. He will be voting against this proposal at the April 26th PEP meeting.
 - d. The policy of closure lacks a long-term vision, and needs a proven track record of success.
 - e. He does not want this school to be a school improvement experiment.
 - f. He has introduced a resolution to be voted on at the April 26th PEP calling upon the DOE to abandon the turnaround model and withdraw the proposals to close and immediately replace schools, and asked attendees at this hearing to attend the April 26th PEP meeting to support his resolution against school closures and the turnaround model.
4. Ken Cohen, the NAACP New York State Conference Regional Director, stated he was speaking at several meetings against school closings.
 - a. The proposed changes are no different than what schools are already doing, and will not make a difference. The new schools have the same education, and will simply be repeating the same process. We need to change the level of education, but not by this process. This process is just creating fear.
 - b. In 1891 Flushing was the first school in the country to allow African American students.
 - c. The DOE should provide the resources to the school that are necessary for it to be successful.
5. Mike Favilla from State Senator Stavisky's office stated
 - a. It takes longer than two years to improve a school, and the school has shown improvement over the past two years.
 - b. Flushing has already improved its graduation rate from 39% to 60%
 - c. Flushing already fired staff under the transformation model, so why is the DOE proposing to continue firing staff under the guise of changing the school name? Firing is not a solution; the same problems remain.
 - d. There are diverse needs in a school, and one-size does not meet the needs of all schools in the City.
 - e. Senator Stavisky was formerly a teacher at Flushing, and opposes the process.
6. Aida Morel representing Assembly Member Grace Meng stated
 - a. The school is a historic landmark,
 - b. The school supports immigrant students.
 - c. The school should be given additional resources to succeed.
 - d. The DOE should acknowledge the improvements and do what is right.
7. Emily Paez representing State Senator Jose Peralta stated that
 - a. Senator Peralta is an alumnus of this school and is opposed to the proposed closure.
 - b. He has written a letter to Chancellor Walcott along with other elected officials to oppose this process (this letter is included as comment number 73).
8. SLT representatives from Flushing stated:
 - a. They thought the decision would not be made until April 26th, but received an email stating it was time to decide upon a new name for the school before the school break. They wish to keep the current name which is 100 years strong.

- b. Teachers want to stay at Flushing.
 - c. It takes a long time to nurture new teaching talent.
 - d. The proposal is unfair to the principal and staff, and messes with the staffs' livelihood.
 - e. The proposal is disruptive to students.
 - f. Counselors help save students and are critical to students, as are school aides and paraprofessionals.
 - g. The DOE should stop programs like credit recovery. Kids should be pushed to be the best they can be.
 - h. Flushing is already making changes and growing stronger. It will continue to grow, change, and serve the needs of the community.
 - i. They believe the EIS does not provide a clear educational program.
 - j. Flushing has had three principals in the last few years. How does this help students succeed?
 - k. Asserted that if this were Bloomberg Financial, a pet project would not close. Bloomberg should not close public schools.
 - l. A parent member of the SLT asked Deputy Chancellor Weiner not to close the school.
9. One commenter stated the DOE should reduce class sizes, and increase course offerings.
10. One commenter stated the number of special needs students at Flushing has risen from 75 to 500.
11. One commenter stated "if it ain't broke, don't fix it," implying they did not believe Flushing is broken.
12. One commenter stated this would disrupt the lives of students, parents and teachers.
13. One commenter stated:
- a. Teachers are not being recognized for their efforts.
 - b. The DOE is not recognizing relationships that are built at a school.
 - c. The DOE has changed and is putting undue pressure on everyone else.
 - d. The Mayor is punishing students by closing schools. He is not an education Mayor.
14. A parent stated she was very sad, and mad at the Mayor. Teachers are helping her child get better at math. Teachers stay late, students stay late to be involved in extra-curricular activities, which are very important.
15. A student stated:
- a. Many activities have been cut due to lack of funding, including trips, arts, and community projects.
 - b. The principal has been very supportive of students and allowed them to start peer tutoring and other projects.
 - c. The name should remain Flushing High School.
16. Another student stated:
- a. This school supports many immigrants, and more than 40% of students are non-native speakers. The school empowers ELL students.
 - b. The school used to have 21 clubs, and now only has 6. This has caused decreased morale among students.
 - c. Closing the school takes away important support systems, such as teachers, and the High School Today/College Tomorrow program.
17. A representative of the Council of Supervisors and Administrators ("CSA") stated the CSA's opposition to this process, and noted it would result in increased costs due to the number of teachers who would be excessed and placed in the Absent Teacher Reserve ("ATR").

18. An assistant principal acknowledged the graduation rate has been low since 2002. However, she attributed this to the former principal, who was not concerned about a 42% graduation rate. She asserted this principal and the guidance counselor made lots of mistakes, and the guidance counselor did not know the correct course sequence students required. She asserts this was allowed to continue even though teachers expressed their concern to the principal and the DOE. The school should not suffer as a result of the poor actions of these individuals.
19. A speaker stated this proposal is all aimed at the UFT and the issue of teacher evaluations, and questioned why this is the right plan for the school.
20. Several students spoke against the proposal. There are many students who are learning and want to keep the school open, and they spoke positively about their teachers. It is unfair for teachers to have to defend their jobs.
21. A teacher asserted the meeting is a formality and the decision has already been made.
22. A teacher asserted these proposals are breaking down communities of color and revalidating segregation. Flushing was the first school to have an integrated student body.
23. Janela Hines representing UFT president Michael Mulgrew stated:
 - a. It is a shame people have to come out to defend the school community.
 - b. The school has made progress without the support of the DOE.
 - c. The graduation rate has improved; the school would not be on the PLA list this year if a new list was published.
 - d. The school needs additional supports, not closure.
24. A student stated:
 - a. There are strong relationships between staff and students; this is a family.
 - b. Alumni should be able to come back to a school with the same name.
 - c. The DOE should invest money in the school and the community instead of spending funds on closure.
25. A parent stated:
 - a. Her child has grown academically at Flushing, and gone from failing to doing well.
 - b. Bloomberg should not take away freedom to choose what schools students want to attend.
 - c. She doesn't understand why students need to move to another school with another name.
26. A teacher who was formerly in the ATR pool asserted that teachers need 5-8 years to reach their potential and be great teachers, so putting 40% new teachers in a school does not make sense.
27. The President of Sports and Arts Schools Foundation asserted:
 - a. Flushing is not a failing school and should not close.
 - b. The principal has transformed the school. DOE should look at the improvements in statistics.
 - c. There is strong school pride and commitment to academic improvement.
 - d. The High School Today/College Tomorrow program is very successful, with over 98 percent of its participants on track to attend college.
28. A teacher stated he was discouraged by the education system and asserted:
 - a. Flushing has achieved significant improvement in recent years, including graduation rates and performance on regents exams.
 - b. Teachers that are rated satisfactory should not need to reapply for the same jobs. Removing teachers is immoral.
29. A teacher of Chinese asserted:

- a. The bi-lingual program at Flushing is strong and supportive of students. The majority of her students barely spoke English when they arrived, but have met high school standards and are going to college.
 - b. The school is a home away from home for students.
 - c. The school is at the front line of the battle to educate students with special needs.
30. An alumnus stated:
- a. The school has suffered through DOE policies.
 - b. An increase of low achieving students does not help increase graduation rates.
 - c. The school is a second home to its students.
31. A guidance counselor at Flushing stated:
- a. The school has become a second family, and all students have a story. The DOE needs to look at the stories, and not just the statistics.
 - b. All students have the ability to achieve and succeed.
 - c. Many students at Flushing have succeeded despite rape, molestation, murders and other horrible personal circumstances.
32. A student asserted:
- a. Teachers should not be blamed. They are trying very hard. Students must be responsible for their own academics.
 - b. Changing the name of the school will not make students do something they don't want to do.
 - c. The High School Today/College Tomorrow program has been very helpful.
33. An alumnus of the school asserted:
- a. Flushing is like a second family.
 - b. Closing schools sends the wrong message to children – that it is okay to give up and abandon the school.
34. Kenneth Cohen Jr., CEC district 25 member asserted:
- a. He strongly opposes the proposal.
 - b. The Mayor has limited the power of parents and the CEC.
 - c. He applauds the students that spoke tonight and are organizing to save the school.
35. A parent asserted:
- a. The DOE should have come in person to communicate the issues at the school rather than sending letters saying the school was failing.
 - b. This process communicates to students that they are failures. His son is not a failure.
 - c. The school is not a failure – students are demonstrating their communication and presentation skills as they speak to save their school.
 - d. The principal has only had one year. He is not a failure. He has had less than a year to implement change.
 - e. Small schools/learning communities do not work.
36. A teacher at Jamaica High School asserted:
- a. The DOE makes promises about how things will be better, but they are not true.
 - b. The Mayor has eight votes on the PEP, so this is a fake process. We need to end Mayoral control. It does not work.
37. A commenter asserted:
- a. Schools are overcrowded. Classrooms are overburdened.

- b. With a large population of ELLs, it is a major accomplishment to graduate them in four years.
 - c. There are lots of recent success at this school.
 - d. The DOE should not label kids as failures.
38. A student asserted:
- a. Taking away 50% of the staff takes away from the safe, supportive environment.
 - b. The DOE should spend a month at Flushing before making a decision.
39. A student asserted:
- a. The proposed changes are not in the best interests of students.
 - b. Changing the name of the school strips away the history of the school and the community.
40. A teacher who had previously been a student at this school asserted:
- a. The school is a second family
 - b. What are the DOE's plans besides changing the name? What about lowering class size or changing student teacher ratios?
41. A student asserted this school is a second family to her. Teachers and counselors are supportive and believe in her.
42. A commenter asserted:
- a. Graduation rates and promotion rates have increased steadily in the past few years. The school is making efforts to improve.
 - b. The DOE should give the full three years for the transformation model to work.
 - c. The DOE should take responsibility for its own failures.
 - d. There are unequal resources for communities of color, immigrants, ELLs, and Special education students.
43. A teacher asserted: The PEP would not be able to write four essays in four months in Chinese . This appeared to be a metaphor for the expectations for immigrant students who do not arrive speaking English.
44. A teacher asserted:
- a. She puts in 60 hours per week without overtime.
 - b. She works with 150 students.
 - c. School closure erases 215 staff, representing thousands of years of students' lives and joint experience.
45. Several commenters asserted the DOE should look at the school, not just the numbers.
46. A teacher asserted:
- a. "The fix is in" implying the decision about this school has already been made.
 - b. The DOE only sent one appointee to the hearing, and he won't share anything about the hearing back at the DOE.
 - c. The school is in 2nd place to Stuyvesant for 4-5 years in math Students who don't speak any English [when they arrive] are succeeding and graduating.
47. The program manager of High School Today/College Tomorrow stated:
- a. his support for the principal and asserted the principal has not been given enough time to improve the school.
 - b. The DOE is finding more and more reasons to close schools rather than reasons to keep them open.

48. An English teacher asserted:
- Students would be negatively impacted by removing relationships and the supportive environment.
 - Flushing has improved its graduation and promotion rates
 - Teachers are working incredibly long hours yet are being told their lessons are not good enough. He asked what is good enough?
49. A student asserted the school should not be closed and cited examples of college scholarships – including a student admitted to West Point -- college acceptances to NYU, published articles and successful alumni as arguments against closing the school.
50. A student opposed the proposal asserting:
- Closure does not increase student performance.
 - Converting schools to charter schools doesn't increase student performance.
 - Students should not be "lab rats" for experiments to improve schools.
51. A student stated he was involved in many activities and programs at the school, and feels pushed to succeed. The school is a family.
52. Another student asserted the school is the best thing to happen to him, and other students feel similarly. He is bilingual and proud to be in a diverse school. He is a member of several extra-curricular clubs and programs. The school is not perfect, but has successes.
53. Several alumni spoke to oppose the proposal, acknowledged the teachers in the audience, and spoke positively about their experiences at Flushing.
54. A commenter stated these proposals are not about the potential the \$58-60 million in SIG funds from the state. He encouraged the audience to advocate to the Borough representatives on the PEP to vote against the plan and see if they can get the rest of the PEP to vote against closure.
55. A teacher asserted:
- Flushing has met all its goals, and asked what else Flushing could have done.
 - The DOE record is littered with failure, while Flushing has shown improvement and progress.
 - DOE has not provided support to the school when it was needed.
56. A commenter spoke about the history of the school and asserted:
- Changing the school name will not create a better learning environment
 - Teachers are doing their job and creating progress.
57. A student asserted:
- None of the teachers are incompetent; they have taught students well.
 - The school is very diverse and has students from all over the world.
 - Students succeed based on their own efforts; there is nothing teachers can do if students don't try. Students who don't try are creating problems for students who are trying.
58. A commenter who is the President of the Chinese Women's Association asserted:
- Flushing students have impressed her compared to other students she meets.
 - Flushing does well even though it is not a selective admission school.
 - Closing the school punishes students and paints them as failures.
59. An alumnus stated his opposition to the proposal stating:
- The name should remain the same. DOE should not erase student's memories.
 - There are many famous alumni.
 - The school is a historical landmark.

- d. The DOE should stop blaming the teachers.
 - e. School budgets are cut 1% each year.
 - f. After school clubs and activities are great for students and for the school.
60. A commenter asserted:
- a. Former Chancellor Cathie Black was incompetent.
 - b. The Mayor has made schools a business, and is taking money away from schools and communities.
 - c. The proposals are union busting – getting rid of long-time teachers and replacing them with new teachers.
 - d. Poor student performance is not the fault of students or teachers; society creates difficult circumstances for students that make it difficult for them to succeed.
 - e. We shouldn't break this school up into small schools. If this school is broken up, the DOE should close large successful schools as well.
61. A student asserted that two minutes is not enough time to fight for the school.
62. A speaker asserted the CEC should have had a representative on the dais. Only one CEC representative attended. The CEC should be taking this more seriously.
63. One commenter asserted Mayoral Control was not a green light for dictatorship. Closing schools takes away student and teacher voices, and stigmatizes communities, students and schools.

The following questions were raised in the Q&A portion of the hearing:

- 64. Is the DOE planning to turn Flushing into small schools?
- 65. What will happen to students with this proposal?
- 66. What will happen to teachers?

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

- 67. One commenter stated ELLs need additional supports, like teaching students English before going on to other traditional classes. ESL classes should be renamed EPL – “English as Primary Language” or other variations to recognize that English is the primary language in this country and students need to learn English to be successful.
- 68. President Roosevelt bought a painting by a Flushing student that now hangs in the White House.
- 69. A teacher came out as a homosexual and asked attendees to support gay rights.

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

The DOE received two written comment and two oral comments through the dedicated email address and phone line for this proposal.

- 70. State Assembly Member Catherine Nolan wrote stating:

- a. She opposes the proposed closure of Flushing High School
 - b. She is concerned about the impact of changing course from the transformation work that had already begun at Flushing. Transformation is intended to be a three-year process. Changing course after only five months is bad public policy. The school should be allowed to continue its transformation work.
 - c. Benefits from closing and reopening the school will be negated by problems this approach will create. Doing this at 33 schools will strain DOE personnel and resources. [NB: Since this letter was received, the DOE withdrew its proposal to close seven schools]
 - d. Parents will be unlikely to send their children to this school at this point, regardless of the future form.
71. A caller asked what would happen to students and teachers if the proposal is approved.
72. A student asked if he/she would be able to transfer to a different school. [both phone and written comment]
73. The Queens delegation of the New York State Senate sent a letter
- a. urging the DOE to allow the eight Queens high schools that were already implementing either Restart or Transformation to be allowed to continue those approaches, and
 - b. stating that the city and teachers union had resolved the issue that led to the termination of the Restart/Transformation funding.

The following written comments were received relating to all proposals for closure and replacement of PLA schools:

74. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
75. 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.
76. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
77. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
78. 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.
79. One commenter asked what supports are being offered to schools being closed and replaced.
80. 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).
81. One commenter asked about the timeline for the implementation of the new model.
82. One commenter asked about the supports that networks and other entities have provided to the schools that are in PLA/SINI status or have declining progress report grades.
83. One commenter asked about how summer school will be implemented.
84. 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.
85. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.

86. One commenter asked about who makes up the planning team for each school.
87. One commenter asked if the state mandates a JIT review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
88. 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.
89. One commenter asked if the JIT reports are available to the public.
90. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
91. One commenter asked if rising ninth-grade students can opt out of a turnaround school.
92. 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?
93. 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.
94. One commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.
95. One commenter stated that the DOE advised CECs not to offer comment at joint public hearings.
96. 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.

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

Comment 1a opposes the proposal based on the history of Flushing High School as a community institution. Comments 6a, and 59c note the school is a historical landmark. Comments 3b, and 4b also cite the history of the school. While history and tradition can play a positive role in a school culture, it is most important to assess a school on the basis of its current performance and student outcomes. In this case, the DOE believes Flushing is not serving a large portion of its student body well, and we believe this proposal will better serve current and future students. The building will continue to be used in the community for the same purpose, and the building will retain its landmark status.

Comments 1b, 60e, and 64 oppose the strategy of restructuring large high schools into multiple smaller high schools, and ask whether this is being proposed for Flushing. The proposal to close and immediately replace Flushing does not involve converting Flushing into multiple small schools with separate principals. Rather, one large comprehensive high school with a similar size and student population is proposed to replace Flushing. Under its transformation efforts, Flushing began implementing small learning communities, which provide greater structure for

students and promote greater accountability for student outcomes; however, these are not separate school organizations. The proposed new school plans to continue this work with small learning communities.

Comment 1c references previous DOE reorganizations. Although the DOE has restructured its internal operations, these changes have always been in service of a single mission and agenda: to create high quality school choices and accessibility for all students. We believe this proposal will help achieve that mission.

Comment 1d questions why the capital plan has no new seats within Council Member Halloran's district even though all high schools in that area are overcrowded. The capital plan looks at high school seat demand and capacity on a borough-wide basis, as opposed to a city council district or community school district basis, because all students are able to apply to any high school citywide, and many students choose to attend schools outside of their immediate neighborhood. The 2010-2014 capital plan does fund 1,473 new high school seats in Queens; the February 2012 proposed amendment to the capital plan would fund an additional 810 high school seats in Queens if approved by City Council.

Comments 1e, 34b and 63 assert that parents and CECs do not have input into the proposal. Last Spring, the Department held meetings to begin or continue conversations with PLA schools and their communities about the schools' performance and possible improvement strategies. In January 2012, after taking into account a number of factors, the DOE decided to implement different, more intensive interventions at some PLA schools. At that time, superintendents and Children First Network staff met with school communities to talk about the DOE's proposal to close and replace the school.

The DOE issued proposals to close and replace a number of PLA schools between February 27 and March 5, 2012, consistent with applicable New York State law and Chancellor's Regulations. The proposal for Flushing was posted on March 5, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for Flushing was held on April 18, 2012, as well as through voicemail and email. That feedback is incorporated throughout this document.

The DOE has considered all of this community feedback in deciding whether to continue with this proposal; indeed, the DOE withdrew several similar proposals based on continued review of community feedback and consideration of other factors. This document summarizing the community feedback is presented to the PEP to help inform its decision about the proposal. While the DOE understands that some parents disagree with the proposal, the DOE believes it is the right decision for students.

The roles and responsibilities of Community Education Councils are defined by state law, rather than by the Mayor. For High Schools, the Citywide Council on High Schools ("CCHS") is the advisory council that includes high school parents. CECs are the advisory councils for elementary and middle schools. Nevertheless, a member of the CEC 25 attended the joint public hearing.

Comments 2a, 49, and 59b assert the school has produced many successful alumni. As described in comment 53 several alumni described their positive experiences at the school. The DOE commends the achievements of Flushing's alumni. As previously noted, the DOE is focusing on the current academic performance and student outcomes, and must act in the best interests of current and future students at Flushing. The administration and teachers at any school change over time. The building will continue to serve high school students, many of the current teachers

and staff may continue at the school for many years in the future, and the building will continue to be available for alumni to visit.

Comment 2b proposes that the DOE lower its expectations for this school it serves a high percentage of ELLs and students with special needs. Comment 29c also addresses the challenges of special needs students. Conversely, comments 16a, 29a, 37b, 46d assert ELL students are succeeding at Flushing. The DOE reviews a broad range of metrics to fully evaluate school performance, including four- and six-year graduation rates, graduation rates for ELLs and students with special needs, credit accumulation, attendance, Quality Reviews, and other information, then compares that data to other schools serving similar populations of students. Thus the focus of this proposal is on ensuring student progress for all students in the Flushing community, not merely comparing the performance of ELLs to native English speakers. Furthermore, though Flushing's graduation rate for ELL students is comparatively better when compared to the citywide average than its overall graduation rate, neither is strong. Flushing's graduation rate for ELL students is in the 41st percentile Citywide, compared to its overall graduation rate which is in the 27th percentile Citywide.

Comment 2c and d, 42b, 70b, and 73a assert the school should be allowed to continue the transformation process, and that the DOE has not given Flushing enough time to improve. Comment 47a also supports giving the school more time to improve. In the Spring of 2011, the DOE applied to SED to place Flushing in the Transformation model, which SED approved conditional upon the DOE and UFT agreeing by January 1, 2012 to implement a new teacher evaluation system. However, the DOE and UFT failed to reach an agreement on the elements of a new system, and at that juncture, the DOE reassessed the viability of Transformation as the best intervention model for maximizing improvement at Flushing. At that point, the DOE determined a more intensive intervention was needed to achieve the desired outcomes for current and future students. Further, until the DOE and UFT reach an agreement on the new teacher evaluation system, Flushing is not eligible for federal funds under the Transformation model.

Comment 2c also concerns the ability of students to plan where they are attending school next year. Comment 65 and 71 asks what will happen to students as a result of this proposal. All current Flushing students are guaranteed a seat at the new school. All students who matched to Flushing in the High School Admissions Process will be automatically enrolled in the new school. The DOE believes the new school will build upon the current strengths at Flushing, and will provide improved student outcomes to its students. Many of the teachers and staff at the new school will be current Flushing staff. Thus students will have a significant amount of physical and personnel continuity at the new school.

Comment 3d asserts the policy of closing and replacing schools lacks a long-term vision, and needs a proven track record of success. Similarly, comment 3e and 50c asserts that the proposal is an experiment in ways to improve schools. The DOE has a positive track record of creating new high schools. 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 4a raises concerns that the new school will continue to have the same problems as at present, and the changes proposed are not sufficient to make a difference. Similarly, comment 32b and 56a assert that changing Flushing's name will not change student behavior or create a better environment. Comment 40b questions what else will change besides the name. Comment 50a asserts closure does not improve student performance. As noted above, the DOE has substantial experience closing schools and replacing them with new schools that serve the same student populations but achieve significantly improved student outcomes.

Comments 4c, 6c, 23d, and 24c assert the DOE should provide additional resources for the school to be successful. Flushing has been struggling to serve all of its students, and the DOE believes that the closure and replacement of the school would best serve the needs of the students in the school community. As stated in more detail in the EIS, the school's network has provided support in many ways, but even with this support, the DOE has determined that Flushing does not have the capacity to quickly improve student achievement. Further, new schools are funded in the same manner as other schools: funding follows the students and is based on need (incoming proficiency level and special education/ELL/Title I status). Thus, Flushing already receives funding to address its higher need students aligned with its student population. While it is true that new schools receive start-up funding, the start-up funding they receive is an average of \$30,000 per year over the first five years for an elementary or middle school and \$34,000 for a high school. These annual amounts are not even large enough to cover the salary of a first year teacher.

Comments 5a, 5b, 6d, 8h, 11, 23b, 27a-c, 28a, 35e, 37c, 42a, 48b, 55b assert that Flushing is already improving and closure is unnecessary. As acknowledged in the EIS, Flushing has shown some progress in increasing its graduation rate, and has also demonstrated some success in graduating overage students. It is accurate that graduation rates at Flushing have been increasing over the past few years. The DOE commends and acknowledges the students and staff at Flushing for their hard work and successes. However, as noted in the EIS, Flushing's four year graduation rate remains far below the citywide average, and the school earned a D on its overall progress report, which indicates that it compared poorly against other schools with similar student populations. The DOE believes that the students in this community will be better served by the new school.

Comment 5c asserts that staff turnover will not solve the issues at Flushing, and that there has already been staff turnover under the transformation model. While some teacher turnover might have occurred over the past year it was not required as part of the transformation model. As noted above, the DOE has substantial experience in implementing the 18-D process that has resulted in improved student outcomes. The proposal does not require that the new school hire a specific percentage of new teachers, so to the extent there has already been some turnover at Flushing resulting in more highly qualified staff, that may increase the number of current

teachers who are ultimately rehired. Please refer to the response to comment 3d for more information.

Comment 5d notes that schools must meet diverse needs. The DOE agrees, and seeks to provide all students with access to high quality school choices.

Comment 6b and 57b assert Flushing serves immigrant students. As noted above, the DOE takes into consideration a school's unique student populations, and compares a school's performance against other schools serving similar populations. The proposed new school would continue to serve immigrant students. As noted in the EIS, New School will seek to implement new literacy goals and strategies across the curriculum for academic language acquisition for ELLs. It will structure a cohesive language acquisition approach to teaching English to speakers of other languages while supporting content mastery. New School will develop a clear system of differentiated, scaffolded support and inclusive structures for students with special needs. These would include emphasis on high quality Native Language Arts ("NLA"), implementing the citywide NLA curriculum, emphasizing academic vocabulary acquisition in both ESL and NLA in both Spanish and Chinese, adding a Heritage Language program in both Spanish and Chinese as an academic support to ELL and post ELL students as well as use of Achieve 3000. Flushing has been working with HSTW and its network on programming for ELL students and students with disabilities, and New School will carefully review the recommendations for implementation, including integration of ELLs and students with disabilities across SLCs, as well as targeted intervention for subgroups that have been identified as being at-risk. Flushing also currently offers a transitional bilingual program in Spanish and a program in Chinese. New School will also offer these transitional bilingual programs.

Comment 8a expresses concern that the decision to close Flushing has been made prior to the vote on April 26, 2012, as evidenced by the DOE's solicitation of proposed new names for the new school. Comments 21, 36b and 46a also assert the decision to approve the proposal has already been made. This proposal has not yet been approved by the PEP. The request to provide a name for the proposed new school prior to the PEP's vote was made to potentially enable the name of the new school to be included in the High School directory for 2013-2014, should the PEP vote to approve the proposal on April 26, 2012. Unfortunately, the publishing deadline for the High School directory occurs shortly after the PEP vote. As a result, the names in the High School Directory may not be accurate.

The DOE is committed to listening to public feedback and considering the information provided at joint public hearings as well as other forums. As evidenced by the recent decision to withdraw the closure and replacement proposals for seven PLA schools, and several other decisions to withdraw proposals for different changes to schools, the DOE has demonstrated that no proposal is a "done deal" prior to the actual vote by the PEP, and that public comment can impact the DOE's decision-making process.

Comments 8a, 15c and 59a propose that Flushing's name should be retained. Comments 24b and 39b assert that the name should remain for alumni's relationships and memories, and to retain the history of the school. The DOE recognizes that Flushing's name is rooted in the community, however, all schools must have unique names. If this proposal is approved, the new replacement school must have a different name (and school identification number, or DBN) than the closing 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.

Comment 8b asserts that teachers want to stay at Flushing. Comment 66 and 71 ask what will happen to current Flushing teachers. All teachers from Flushing are eligible to apply for positions at the proposed new school. The new school is expected to serve the same student population as is currently enrolled at Flushing, so teachers who are hired at the new school will be in the same location and serving the same student needs. The DOE believes change is required to improve the performance of the school and meet the needs of the many students who currently do not graduate. Teachers who are not rehired will have the opportunity to apply for jobs at other schools, including both existing and new schools opening in September 2012. Barring system-wide layoffs, all current teachers will continue to be employed.

Comments 8c, and 26 assert that it takes a long time for a new teacher to become effective, and staffing the new school with 40% new teachers in a school may not be good for the school. While some or many of the teachers hired at the proposed new school will be new to the building, that does not necessarily mean they will all be new to the teaching profession. Teachers hired at the new school will include teachers who currently teach at Flushing, experienced teachers who currently teach in other DOE schools, and potentially up to 40% teachers who are not currently teaching in a DOE school, which includes both new teachers and experienced teachers who may be moving to New York City from other locations. There is no requirement that 40% of the teachers at the proposed new school be new teachers.

Comment 8d states the proposal will affect teachers' livelihoods. As stated above, barring system-wide layoffs, no current teacher will be unemployed as a result of this proposal. 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.

Comments 8e, 12, 16c, and 38a contend that the proposal will be disruptive to students, and others at the school and in the community, by taking away programs, opportunities, and known teachers. While closing a school may be a difficult experience for the community, the DOE believes that replacing Flushing with a new school, which preserves the best elements of Flushing but also puts the most effective educators in front of students, will allow the school's students to improve more quickly—and this will be a long-term stabilizing force for the school and the community.

Comment 8f states that counselors, school aides and paraprofessional staff are important to students. The DOE agrees with this statement. The proposed new school would be able to hire counselors and paraprofessionals, subject to the hiring regulations in the collective bargaining agreement with their respective collective bargaining units.

Comment 8g proposes that the DOE should stop offering credit recovery. The DOE wants to ensure all students earn the credits they receive. In some cases, credit recovery enables a student to appropriately earn that credit. However, as part of the recently conducted High School Data Audit, the DOE announced new policies restricting the use of credit recovery, effective for courses failed during Term 2, 2012. These restrictions are more stringent than State regulations. Credit recovery will be limited as follows:

- Only students who attended 2/3 of the course are eligible (with an exception for students with documented extenuating circumstances, who may take an incomplete)
- Students must complete credit recovery in the semester or summer immediately following the course

- DOE will centrally approve online credit recovery programs
- School credit recovery panel must consult the teacher of the original course and document their decisions.

Comment 8i contends that the EIS does not provide sufficient detail of the new school program. Many of the components of the new school will build upon the current strengths at Flushing and the transformation work that had begun. Section III.A. of the EIS provides extensive information regarding many proposed elements of new school, including, but not limited to its vision, instructional model and curricula, CTE programming, academic supports and interventions, and support for students with disabilities and ELLs. The proposal to close and immediately replace Flushing will enable the school to accelerate the improvements already underway. A critical component to any school is the shared vision and commitment of the staff to both educational philosophy and execution. The guiding principle of this is work is to effectively match teacher capacity to the needs of the students in a specific school along with making structural changes to the new school that will enhance the its ability to best serve our students. This means that the new replacement schools will only hire those teachers they believe will be effective and well-matched to their new missions.

Comment 8j suggests the changing of principals in recent years has not helped support Flushing. Related to this, comment 18 asserts the former principal and staff are to blame for the low graduation rate as they did not push for change. While the DOE acknowledges that performance under the prior principal was poor, school leadership is only one component of a school's performance, and the DOE will not comment on individual personnel. Regardless of the reasons leading to poor performance, the proposal to close and replace Flushing is based on the DOE's belief that this intervention is the most effective way to achieve rapid improvement in student performance in this building. The DOE's primary focus is on identifying approaches to achieve rapid improvement in student outcomes.

Comment 8k asserts that Mayor Bloomberg should not close public schools. Closing ineffective schools and opening new school options has been a cornerstone of this administration's education policy. Since the DOE began closing and replacing ineffective schools, overall graduation rates have increased 19 points. Please see the response to comments 3d 3e and 50c for more information.

Comment 8l asks the DOE not to close Flushing. The DOE has listened to the feedback from the joint public hearing, and has decided to ask the PEP to vote on this proposal on April 26, 2012. The DOE believes that the strategy of closing and replacing Flushing 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 meet the needs of all 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.

Comment 9 suggests a solution would be to decrease class size. Comment 40b suggests reducing class size or student/teacher ratios as an improvement. Class size reflects a combination of funding availability, teacher and staff salaries, and decisions made by principals as to how to allocate their financial resources to provide the best teaching and learning environment possible.

Within the constraints of available funding, many schools have seen class sizes increase in order to continue providing other programming options and services to students. It may be better for students to have higher class sizes but also have additional support resources than to have smaller class sizes. The DOE empowers principals and their SLTs to make these choices for their schools.

Comment 10 assert the increase in the number of special education students has contributed to the poor results at Flushing. In the 2010-2011 and 2011-2012 school years, the percentage of students with IEPs, and IEPs for Integrated Co-Teaching classes at Flushing were and are the average for all schools district and borough-wide, and equal to or below the averages for all schools Citywide. The percentage of students with IEPs for Special Class is one percentage point above the district average, and equal to the borough and citywide averages. Thus Flushing has not experienced an unusually high enrollment of special education students.

Comments 13a, 14, 32a, 44a and b, 48c state that teachers are working hard and are not receiving recognition for their efforts. Similarly, comments 56b and 57a assert that Flushing's teachers are effective. Teaching is certainly among the most demanding and challenging professions, and many of the rewards of teaching are emotional rather than tangible. The DOE commends the efforts of Flushing's staff. However, praise and recognition for student successes are tempered by the number of students who do not succeed academically. As indicated in the EIS, one of the goals of this proposal is to allow New School to hire the most qualified staff and create an improved learning environment for current and future students.

Comments 13b and 48a assert that student-faculty relationships will be harmed by this proposal. Comments 24a, 29b, 30c, 31a, 33a, 40a, 41, 51, and 70c assert students view Flushing as a "second family" and a "home away from home." The DOE lauds the relationships established between students and faculty at Flushing. It should be noted that this proposal does not limit the number of current Flushing staff that may be hired at New School, so many of the existing relationships may be continued at New School. The DOE acknowledges that any change in school staff will result in some disruption for some students. However, the DOE believes the benefits of hiring the most qualified teachers in order to improve the level of instruction on the Flushing campus for all students – including those that are not currently succeeding at Flushing -- outweighs the potential disruptions this proposal might cause.

Comment 13c asserts the DOE is putting undue pressure on schools. The DOE is focused on providing high-quality options to all students. SED has provided feedback that the pace of change at some PLA schools has not been rapid enough to meet the needs of students. Delays in progress have significant impacts on young adults, so there is good cause to press schools to achieve better outcomes for their students.

Comments 13d, 35b, 37d, 58c assert that school closures punish students and communicates to students that they are failures. The DOE recognizes that closing a school is a difficult experience for students, staff, and community members. However, whenever the decision is made to move forward with a proposal to close a school, it is because students deserve a better option. In this situation, the DOE believes the best way to better serve its students and improve outcomes more quickly is to close and replace Flushing. Thus, the DOE believes that this proposal will positively, not negatively, impact students.

Comments 13d and 14, imply the Mayor is responsible for the proposal. These proposals have been made by the DOE based on its assessment of the interventions that have been pursued in the past, their outcomes, and the needs of current and future students.

Comments 14 and 59f concern the importance and strength of extra-curricular activities at Flushing; comments 15a and 16b state that funding cuts have reduced extra-curricular activities, and thus harmed the school. The DOE agrees that extra-curricular activities are valuable because they provide important opportunities for student engagement, leadership, self-expression, mastery, and skill-building. Principals and SLTs are empowered to make decisions about how to allocate available resources within the school, including decisions about extra-curricular activities. In addition, schools are able to raise external funding through grants, parent involvement, and other fund-raising activities. Please see the response to comment 42d for additional information concerning funding. Furthermore, as discussed in the EIS, if this proposal is approved, the DOE will work with New School to ensure the smooth transition of all the existing partnerships from Flushing to New School. Additionally, if this proposal is approved, New School is expected at minimum to offer the same extracurricular activities and clubs now offered at Flushing High School, if not more, and the same student athletics as Flushing offers. As with all schools citywide, it is difficult to predict precisely how changes might be implemented as decisions will rest with school administrators and will be made based on student interests and available resources. That is true for any City students as all schools modify extracurricular offerings annually based on student demand and available resources.

Comments 15b, 27b, 35d and, 47a express support for the current principal. The DOE thanks Principal Carl Hudson for his service to the Flushing community. However, the DOE believes the issues at Flushing would be better addressed by creating a new school with new leadership and by enabling a restructuring of staff, rather than by continuing the current trajectory of incremental improvements.

Comment 17 asserts that this proposal will increase the cost of the ATR pool. Current Flushing teachers who are not rehired at the proposed new school would be able to apply for positions at other schools. Only those teachers who do not find other positions would be placed in the ATR pool, where they would be assigned as substitute teachers. So while there is likely to be some increase in the ATR pool, we are not able to predict the number of teachers, or cost. Moreover, the DOE believes that to the opportunity to improve student outcomes outweighs the costs associated with a potential increase in the total number of teachers system-wide.

Comment 19 asserts the proposal is a result of issues between the DOE and the UFT on teacher evaluation. Comment 60c describes the proposal as “union-busting,” intending to replace long-term teachers with new teachers. The DOE has demonstrated that closing and replacing low performing schools has improved student outcomes. The proposal to close and replace Flushing and the other PLA schools works within the agreement negotiated with the United Federation of Teachers (UFT), and specifically implements article 18-D of the UFT contract, which defines the practices for hiring teachers to new schools that are replacing closing schools.

Comments 20, 25a, 49, 51, 52, 58a, 58b asserts that many students are succeeding at Flushing. The DOE commends the positive aspects of Flushing High School. The proposal to close and replace the school seeks to build upon these strengths in order to create an even better school. At the same time, while acknowledging these strengths and the many students who spoke positively about their experiences in the school, the aggregate 60% graduation rate indicates that a large number of students are not having the same success. Even when considering the six-year graduation rate of 63%, Flushing is in the bottom 11% of all schools Citywide, indicating that many students are not having a similarly positive experience.

Comments 20, 23a, and 28b state that teachers should not have to defend or reapply for their jobs. 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. At the same time, teachers who are not rehired will continue to receive their salary and are eligible to apply for positions in other schools.

Comment 22 asserts the proposal is aimed at communities of color, and will revalidate segregation. The proposed new school is expected to serve the same student population as Flushing currently serves. Thus the proposal is not aimed at any particular community nor to increase segregation.

Comment 23c asserts that Flushing would not qualify as a PLA school based on its current graduation rate. While it is true that Flushing's graduation rate has risen above the threshold for initial PLA designation, that does not mean there is not significant room for improvement. Since Flushing is currently on a PLA list, it is eligible to receive SIG funding under the Turnaround model. If the SIG application for the proposed new school is approved, students will benefit from the additional programs and opportunities afforded by this funding. However, even in the absence of SIG funding, the opportunity for rapid improvement would benefit students and should result in a further rise in the graduation rate.

Comment 25b states that the proposal prevents students from attending the school of their choice. The DOE is committed to providing all students with access to high quality school options. Although proposals to close schools may eliminate a specific choice, the number of schools that have been opened has greatly expanded students' options. In addition, the proposed new school will provide students with an improved choice at the same location.

Comment 25c states it is unclear why students need to move to a school with a different name. In order to implement 18-D, and in order to potentially qualify for SIG funding under the Turnaround model, the school must be closed and a new school must open. The new school must have a different identifying number, known as a DBN, and name. Implementing 18-D is a key element to aligning teaching talent with school mission and culture, and thus achieving improvements in school performance and student outcomes.

Comments 27d and 32c, state the High School Today/College Tomorrow program is very successful. The proposed new school plans to build upon the current strengths of Flushing. The High School Today/College Tomorrow may continue to be offered at New School.

Comment 30a states DOE policies have caused the school to suffer. Similarly, comments 42c and 55b assert the DOE's prior initiatives have failed to improve schools. The DOE believes that its policies have led to positive results. Graduation rates since 2005 have increased almost 19 percentage points. Policy changes during this period have afforded principals greater ability to select their school staff members to carry out their vision for educating students. Moreover the DOE's policies have provided all students greater opportunities to attend a school of their choosing: there are now 152 more high schools available than were available to students in 2002. Please see the response to comments 77 and 78 for more information about the success of new schools opened by the DOE to replace large, failing schools.

Comment 30b states Flushing has had an increase in low achieving students. Over the past three years, the student population appears to be decreasing in need level, rather than increasing. For

example, in 2009-2010, 24% of Flushing students were ELLs, while in 2011-2012, only 20% of Flushing students are ELLs. Flushing's percentage of Special Education students has been stable for the past three years, and is equal to the borough and district average.

Comments 31a and 45 state the DOE should consider more than the school's statistics in making school closure decisions. In addition to quantitative metrics, the DOE uses qualitative evaluations of schools such as the Quality Review, and has collected feedback from the community at the joint public hearing, and through email and phone lines established for this purpose. It is our conclusion that this proposal is in the best interest of current and future students.

Comment 31b expresses the opinion that all children have the potential to achieve. The DOE agrees with this comment and believes that this proposal will enhance students' ability to achieve at high levels.

Comment 31c states students at Flushing have succeeded despite difficult personal circumstances. Comment 60d asserts that students' circumstances make it difficult for them to succeed. The DOE applauds these students for their resilience and perseverance. Unfortunately, there are equally as many, if not more, students experiencing similarly difficult circumstances, and who are not succeeding. Schools are the critical avenue to help these students improve their lives.

Comments 31a and 32a state teachers should not be blamed for students who do not achieve; similarly comment 57c asserts that student success is determined by their own efforts, and that teachers are not able to affect student achievement. Comment 59d asserts the DOE should stop blaming teachers. The DOE holds schools accountable for ensuring that all students receive a quality education, not just those that have the personal motivation or home supports to help them succeed. Schools should and do provide many services to students to address their social and emotional needs, and these programs and staff collaborate with classroom teachers to address the needs of all students.

Comment 33b, asserts that closing schools sends a message that it is okay to give up. Flushing has struggled for many years to improve, yet its graduation rate has been in the bottom third Citywide for 8 of the past 10 years. Recognizing that alternative strategies and changing course may result in a better outcome is an equally important lesson. The DOE is sending the message that 60% graduation rate is not good enough.

Comment 35a states the DOE should have communicated the proposal in person rather than in a letter. Prior to issuing this proposal, the DOE met with the Flushing community. On January 18, 2012, Deputy Cluster Leader Thomas Fox met with Flushing's School Leadership Team ("SLT"), parents, teachers, and community members to discuss this proposal and the impact it would have on the school community. In addition, parents and other community members had the opportunity to discuss the proposal with the DOE in person at the joint public hearing held on April 18, 2012.

Comment 35e contends that small high schools and small learning communities do not work. The DOE has been opening smaller high schools in order to provide choices to students who may prefer or benefit from a smaller environment. Since the DOE began implementing the small schools strategy, overall graduation rates have increased 19 points. A recent independent study by MDRC demonstrated an increase in graduation rates and college readiness at these small

schools when compared with schools that admitted students on a comparable basis. These findings of improved outcomes were true for all demographic groups, including the most disadvantaged students. Details of the MDRC study are available at <http://www.mdrc.org/publications/614/overview.html>. Please also refer to the response to comments 77 and 78 for more information regarding the track record of new schools opened by the DOE to replace large, failing schools.

Comment 37a asserts schools are overcrowded. Flushing is currently at 151% utilization. While this is above the building's target capacity, there are many examples of high schools in Queens that are performing better despite even higher building utilization rates. This indicates that high building utilization rates do not prevent a school from helping its students achieve successful outcomes. As previously noted, the capital plan includes funding for additional high school seats in Queens.

Comment 38b asserts the DOE should spend more time at Flushing before making a decision. The DOE is very familiar with Flushing's operations through direct visits and interactions with the Cluster and Network that support Flushing High School, through the work of the school improvement team that has monitored the transformation efforts, and through the high school superintendent. Please refer to section I of the EIS for more information regarding the DOE's decision-making process.

Comment 42d asserts there are unequal resources for students of color, immigrants, ELLs, and Special Education students. In New York City, schools are funded through a per pupil allocation known as Fair Student Funding ("FSF"). That is, funding "follows" the students and is weighted based on students' grade level and need (incoming proficiency level and special education/ELL/Title I status). FSF awards supplemental entitlements on a per-pupil basis for students who have additional needs and therefore cost more to educate. For example, during the 2011-2012 school year, high schools received an additional \$2,043.69 per pupil for each ELL student they enrolled. At the high school level, supplemental funds are also awarded to each student who requires special education services, or who is performing below grade level upon enrollment. In the case of students who fall into more than one of these categories, schools are awarded supplemental funding to meet all of those needs.

While schools receive supplemental support for students with disabilities through FSF, that only represents part of the funding provided to support those students. Schools are budgeted to meet the needs of their students with disabilities as defined by their IEPs. If this proposal is approved, funding will be provided to meet the needs of all students with disabilities at New School in accordance with their IEPs. Thus, schools receive more funding for these students than they would receive for a middle class general education student who arrives performing at grade level.

Comment 43 implies the DOE is asking students and schools to do something impossible for students who arrive not speaking English. The DOE looks at several metrics besides the four-year graduation rate because we understand that all students do not arrive at high school with the same level of preparation, including metrics specific to ELL students and others who may be most at risk. Further, the DOE compares schools to others that serve similar student populations in order to assess the schools relative to their peers. Flushing's six-year graduation rate is in the 3rd percentile compared to its peer group of schools serving similar student populations, lower than its percentile for its four-year graduation rate. Clearly, while some Flushing students are having success, a large number of students are falling further behind.

Comment 44c asserts closure would erase years worth of joint experience; the speaker implied that joint experiences result in improved teaching and school experience. The knowledge and skills these teachers have gained from the students they have worked with over the years will continue to be valuable in their future teaching, whether that continues to be in the Flushing building or in another school.

Comment 46b asserts there is only one DOE representative at the hearing, and that nothing would be communicated about the hearing back to DOE. Deputy Chancellor Weiner was accompanied at the hearing by several other DOE staff from various departments. The DOE is committed to listening to public feedback and considering the information provided at joint public hearings as well as other forums. As evidenced by the recent decision to withdraw the closure and replacement proposals for seven PLA schools, and several other decisions to withdraw proposals for different changes to schools, the DOE has demonstrated that it listens to feedback from the community. Additionally, this document will be made available to the PEP prior to its vote on April 26.

Comment 46c asserts that Flushing is 2nd to Stuyvesant High School in the New York City Interscholastics Mathematics League (“NYCIML”) for the past several years. In 2009-2010, Flushing’s freshman and sophomore team took 2nd place in their division. The competition took place at Stuyvesant High School. The DOE commends the students who participate in NYCIML and the success they have had in competition. However, each team consists of only five students. The success of some students at Flushing does not diminish the fact that a large number of students at Flushing are not succeeding. There are currently 465 seniors at Flushing; four years ago there were 1,148 freshman: over 600 students have fallen behind, dropped out or transferred out.

Comment 47b asserts the DOE is looking for reasons to close schools rather than looking for reasons to keep them open. The DOE continuously assesses the performance of its schools and when it identifies a struggling school, the DOE seeks to implement interventions that will have the greatest potential for positive impact on student achievement.

Comment 50b asserts that converting schools to charter schools does not improve student performance. This proposal does not involve converting Flushing to a charter school. The proposed new school will be a district school.

Comment 54 asserted the proposal is not about receiving the \$58-60 million in SIG funding. While the potential for SIG funding for these schools would provide tangible benefits to their school communities, the DOE proposes to implement these closures even if the new schools do not ultimately qualify for SIG funding under the federal Turnaround model. 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 55a asserts that Flushing has met all its goals. It is not clear from the comment to which goals this commenter refers. While Flushing has been making progress, there is still a great deal of room for further improvement. The DOE believes the opportunity to implement 18-D by closing and replacing the school will support rapid improvement in student outcomes.

Comments 55c and 81 assert the DOE has failed to provide sufficient support in the past. However, the following supports have been provided to Flushing, as detailed in the EIS:

Leadership Support:

Provided leadership training, mentoring, and coaching for the principal and assistant principals to help them set clear goals for the school while developing the school's Comprehensive Education Plan and Language Allocation Plan.

Coached and trained leadership on implementing plans in support of citywide instructional initiative.

Instructional Support:

Trained leadership on implementing plans in support of citywide instructional initiatives, including implementing Common Core Learning Standards.

Trained leadership in use of data to meet graduation targets.

On-going support for instructional and administrative staff to navigate the SESIS (Special Education Student Information System), identify migration issues, clerical issues, updates, and notification of upcoming events, such as webcasts.

Operational Support:

Advised school staff on budgeting, grants, 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.

Supported school staff in Special Education compliance issues, including timely writing of Individualized Education Programs (—IEPs||), alternative assessments and other supports, and strategies for improving instruction and plans for students with disabilities.

Provide specialized support for English Language Learners (—ELLs||) and ensure they meet graduation standards.

Student Support:

Facilitated comprehensive supports to review disciplinary and procedural protocols targeted at improving the school learning environment and impacting student outcomes. Specifically, safety support was provided to school leadership through Central safety walkthroughs aimed at improving procedural protocols.

Comment 59e asserts that budgets have been cut 1% each year. Comment 60b asserts money is being taken away from schools and communities. The DOE tries to ensure as much of the available resources as possible are provided directly to schools. Over the past several years, as federal and state funding to the DOE has declined, it has not been possible to fully shield schools from those reductions in funding. However, schools are empowered to allocate their resources to best meet the needs of their students, and many schools have managed to maintain and improve their performance in this environment. Please refer to the response to comment 42d for more information concerning funding.

Comment 60a asserts former Chancellor Cathie Black was incompetent. Cathie Black is no longer Chancellor, and her tenure did not impact this proposal.

Comment 61 asserts that two minutes is not enough time for public comment. The purpose of the time limit for public comment at the joint public hearing is to ensure that all members of the public who wish to speak will have the opportunity to do so. Longer comments may be submitted in writing through the email address or voicemail number provided for this purpose.

Comment 62 implies that more than one CEC representative should have attended the meeting. There were two CEC members represented at the hearing: one sat on the dais and chose not to speak and one spoke during the public comment period. The CEC's participation complied with all applicable statutes and regulations.

Comment 70d asserts future demand for Flushing will decline. The high school admissions process regularly demonstrates that students and families will choose to attend schools that provide strong learning environments and student outcomes. The DOE is confident that the location, mission and alignment of staff at the proposed new school will continue to attract students.

Comments 3a, 3c, 3f, 5e, 7a, 7b, 70a are general statements of opposition or fact, and do not require a specific response. In aggregate, and per the responses above, the DOE believes this proposal will better serve student needs than the current school organization.

Comments 72 and 90 ask if students would be allowed to transfer out of the New School. All first time ninth graders have the opportunity to apply to other schools for tenth grade through the high school admissions process. All students who were matched to Flushing in Round one of the high school admissions process had the opportunity to apply to other schools during Round two of the high school admissions process. 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 Flushing, 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>. Students who are currently expected to attend Flushing next year who do not wish to do so should this proposal be approved should meet with their guidance counselor to discuss their options.

Comment 73b asserts that the city and union have resolved the teacher evaluation issues that led to the discontinuance of the restart and transformation funding. While recent legislation passed by the State Legislature was a step forward, a teacher evaluation system still must be collectively bargained within the parameters and guidelines of State law, and such an agreement has yet to be reached. Moreover, even if the DOE and UFT reach an agreement on teacher evaluations, it would likely take at least two years for poor performing teachers to be removed from these schools. This timeframe simply is not fast enough for students who deserve our best and most urgent efforts to help their schools improve and get the support they need.

Comment 74 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 75 asks about the engagement process and what part students, parents, and the community play in the process. Last Spring, the Department held meetings to begin or continue conversations with PLA schools and their communities about the schools' performance and possible improvement strategies. In January 2012, after taking into account a number of factors, the DOE decided to implement different, more intensive interventions at some PLA schools. At that time, Superintendents and Children

First Network staff met with school communities to talk about the DOE's proposal to close and replace the school.

The DOE issued proposals to close and replace a number of PLA schools between February 27 and March 5, 2012, consistent with applicable New York State law and Chancellor's Regulations. The proposal for Flushing was posted on March 5, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for Flushing was held on April 18, 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 disagree with the proposal, the DOE believes it is the right decision for students.

Comment 76 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.

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: 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 Flushing who are not hired at New School will remain in excess.

Barring system-wide layoffs, excess 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 77 and 78 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 79 asks about the supports offered to the new schools. The existing schools will continue to be supported by their networks through the end of the school year. The students will also be supported through the efforts of the Office of Student Enrollment to ensure that students have a guaranteed seat in the new school and receive a clear understanding of their enrollment options.

Replacement schools are being supported through several coordinated measures. Proposed principals for the replacement schools began working with the Division of Portfolio Planning, in February and March, as part of the Turnaround Principal Institute. In this intensive workshop, principals have been supported in planning for their schools along a wide spectrum, including such elements as mission-creation, curriculum planning, scheduling, and hiring, among other topics.

Proposed leaders also continue to be supported by their Children First Network in this work.

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 80 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 79 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. Please also see the response to comment 83.

Comment 81 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 82 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.

Comment 83 asks about measurement of the new schools' student outcomes. Flushing 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. The Progress Report methodology is reevaluated each year and this policy is subject to change.

Regarding goals, performance benchmarks are included in the SIG application for each of these schools. These include:

- Reduce the percentage of students in the All Students subgroup who are performing below the Proficient level (Levels 1 and 2) on NYSED ELA and Math assessments by 10% or more from the previous year
- Attain a minimum Total Cohort graduation rate of 60% after one year of implementation; (or) annually reduce the gap by a minimum of 20% between the school's Total Cohort graduation rate and the State's 80% graduation rate standard (for high schools only).

Comment 84 asks about the impact of the new schools and the closure/replacement approach. The DOE believes that the strategy of closing and replacing PLA schools will provide a better educational option to current students more rapidly and with more certainty than current interventions, which were simply not adequate in order to make the school an acceptable choice for current and future students. The closure/replacement strategy will preserve the elements of former school that have led to improvement, while giving the new school the wherewithal to build upon it and accelerate the pace of change.

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

For more specific information regarding the anticipated impact of a proposal, please refer to the Educational Impact Statement for the particular proposal.

Comment 85 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 86, 87, and 88 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. Include date for relevant school. As mandated by State regulation, 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

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.

Comment 89 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.

Comments 91 and 92 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 \$1.8M 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 93 is about funds spent to support Restart schools. The DOE is currently working with six Educational Partnership Organizations (EPO)s to support 14 schools. The DOE has committed to provide funding for the EPO contracts through the conclusion of this school year. This commitment should ensure that the programmatic initiatives that EPOs have in place this year at Restart schools can be completed with fidelity. This commitment to fund the contracts regardless of SED’s reimbursement is only for this school year. The future work of EPOs may not continue if the Department unable to gain access to SIG funding.

Comment 94 contends 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.

Comment 95 represents a petition making multiple points. 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.