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Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of John Adams High School (27Q480) and the Opening of New School (27Q570) in Building Q480 Beginning in 2012-2013

Date of Panel Vote: April 26, 2012

Summary of Proposal

On March 5, 2012, the New York City Department of Education (“DOE”) published a proposal to close John Adams High School (27Q480, “John Adams”), an existing district high school in building Q480 (“Q480”), located at 101-01 Rockaway Boulevard, Queens, NY 11417, transportable classroom unit Q726 located at 108-01 Rockaway Boulevard and annex building Q781 located at 120-27 141st Street, within the geographical confines of Community School District 27. It currently serves students in grades nine through twelve.

The DOE is proposing to immediately replace John Adams with New School (27Q570, “New School”), a new district high school which will serve students in grades nine through twelve in Q480, Q726 and Q781.

On March 16, 2012 the DOE published an amended EIS to correct a typographical error on page 21 and identify the transportable unit occupied by John Adams. On April 20, 2012 the DOE published a second amended EIS which corrected a different typographical error on page 21 referencing the numbers of ninth grade students entering the school through the High School Admissions Process and through Over-the-Counter placement. The second amended EIS also identified an additional annex building occupied by John Adams, and included additional information about Q480 and Q781 in Section VII.

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

John Adams admits students through the Citywide High School Admissions Process using a zoned method and an Educational Option method. John Adams also offers three Career and Technical Education (“CTE”) pathways.

New School is planning to continue programming in all of the same CTE career clusters that John Adams currently offers. Students enrolled in CTE programming at John Adams would have the opportunity to enroll in CTE programming at New School.

In addition, Q480 houses a Young Adult Borough Center, John Adams YABC (Q487, “YABC”), and a part-time GED Plus – Learning-to-Work program (“GED Plus – LTW”).

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 John Adams and replacing it with New School, the DOE is seeking to expeditiously improve educational quality in Q480.

If this proposal is approved, New School will develop rigorous school-specific competencies to measure and screen prospective staff, including former John Adams staff members who apply to work at New School. Based on these criteria, and in accordance with the staffing requirements in Article 18-D of the DOE’s existing contract with the United Federation of Teachers (“UFT”), New School will put in place a process aimed at hiring the best possible staff, thus immediately improving teacher quality and, by extension, improving the quality of learning. New School plans to develop new programs and school supports that are intended to improve student outcomes. By doing this important work to improve student outcomes, the DOE also will maximize New School’s chance of receiving up to \$1,800,000 in supplemental federal funding under the federal School Improvement Grant (“SIG”) program. New School will build on the strongest elements of John Adams and incorporate new elements, including new talent, designed to better meet student needs. Thus, the immediate closure and replacement of John Adams with New School should give students access to a higher-quality educational option while they continue to attend school in the same building.

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

Copies of the EIS are also available in the main office of John Adams High School.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building Q480 on April 19, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 506 members of the public attended the hearing, and 50 people spoke. Present at the meeting were John Adams High School Leadership Team Representative Beverly Townes; State Senator Joseph Addabbo; Congressman Meeks’ Community Liaison, Nathaniel Hezekiah III; Assembly Member Mike Miller’s Chief of Staff Nick Roloson; District Leader Albert Baldeo; Community Board 10 Representative Betty Braton; Richmond Hill Civic Association President Margaret Finnerty; and Citywide Council on High Schools Member Jose Ferruzola.

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

1. State Senator Joseph Adabo opposed the proposal and asserted that John Adams deserves a chance to continue with the Restart model that it was placed in previously, during which the school has worked hard and made progress.
2. Daniel Roads, PA President and member of the School Leadership Team, opposed the proposal and asserted that:
 - a. He has seen the school grow over the last four years.
 - b. The staff are dedicated and the students are not just a statistic
 - c. The school is unique and he feels the students are like his own family

3. Beverly Towns, a member of the School Leadership Team, opposed the proposal and asserted:
 - a. There is qualitative evidence that suggests there is progress
 - b. Teachers are using Common Core Learning Standards and Bloom's taxonomy to improve learning
 - c. The school received a Well Developed ("WD") rating on the 2010-11 Progress Report, followed by a Proficient ("P") rating in 2011-12.
 - d. Graduation rates are rising, more black and hispanic students are graduating.
 - e. The DOE should continue to support the school and give it new resources

4. James McGuire, Science Teacher and member of the School Leadership Team, opposed the proposal and asserted that:
 - a. John Adam's performance is exceeding gains compared to the Citywide and State averages; graduation rate soared to over 64% in 2011, and is predicted to be at 70% this year.
 - b. Gains are seen across all ethnic backgrounds and based on predictions, we will have made AYP so they would no longer be considered PLA by the New York State Education Department.
 - c. The positive trends are a result of John Adam's strong relationships between teachers and students.
 - d. John Adams operates at 118% building utilization, which is over-utilized; despite this fact, students are achieving.
 - e. The attendance rate is 80%, however the school has enrolled additional students due to other Citywide phase-outs and closures
 - f. There has been a rise in over-age and under credited students, and students who are homeless, or victims of abus, and a closure will provide further instability
 - g. Teacher turnover will only harm the students
 - h. John Adams has successful club, sports clubs and extracurricular activities which are supported by the local communities and universities. The teachers help make these programs possible.
 - i. There is no evidence that Turnaround model will work

5. Calvin Palmer, Parent and member of the School Leadership Team opposed the proposal and asserted:
 - a. The Principals interacts well with students and keep the school open 7 days a week, until 9 pm at night
 - b. This proposal is due to politics, which students should be kept out of
 - c. The school is needed in this neighborhood

6. Victoria Alberrato, student and School Leadership Team representative opposed the proposal and asserted that the new school will not provide the same level of dedication and support for future students.

7. Varsha Jagjid, student and School Leadership Team representative opposed the proposal and asserted that:
 - a. John Adams is a great school that has provided a lot of unexpected opportunities and positive family bonds
 - b. The Small Learning Communities give an opportunity to learn at a progressive pace, with opportunities to take advanced classes, SAT preparation
 - c. Attendance rate has risen to 80 percent and graduation rate is going up.

- d. What will students who are applying for college and seeking recommendations supposed to do?
8. Ms Syler, CEC Representative opposed the proposal and asserted that the CEC believes in strengthening the school.
9. Jose Ferralo, CCHS President, opposed the proposal and asserted:
 - a. Mayor Bloomberg should stop bringing politics into the schools;
 - b. The City took away funding resources
 - c. Why are teachers being told re-apply to the school if the proposal hasn't been approved by the PEP?
 - d. Why are you sending letters to families about an NCLB option to transfer? It should wait until this PEP process is over.
10. Ms. Simpson, teacher and School Leadership Team representative opposed the proposal and asserted:
 - a. The CEP is said to be a flexible document; as the needs of our students change, so should the school's approach to educating.
 - b. Once there were 31 pregnant students, our staff stepped in to create a plan for those soon to be mothers.
 - c. We have many overage/undercredited students, we take the students that no other school want.
 - d. Graduating in 6 years is not a problem, because we are the school of the underdogs.
 - e. We are making progress.
11. Betty Brateman, Chair of Community Board 10 opposed the proposal and asserted:
 - a. The community does not share that belief that this proposal meets the needs of the community, as stated in the EIS
 - b. She recognizes that the school needs further improvement, but does not believe that Turnaround is the right way
 - c. She does not believe that closing the schools is the right way to get SIG Funding. DOE should provide the necessary funding as an alternative or the City should use the Lottery Monday or funds generated by Casinos.
 - d. Progress is being made - graduation rates are going up, regents-endorsed diplomas are also going up.
12. Dmytro Fedkowksy, PEP member Queens representative opposed the proposal and asserted that John Adams should not be part of this experiment in politics
13. Leo Casey, UFT Representative, opposed the proposal and asserted that public education is a civil right and this proposal is disrespectful to the school and the community, and Tweed and City Hall should be shut down instead of John Adams.
14. Albert Baldio, District Leadership opposed the proposal and asserted:
 - a. Stop playing politics with the school, it is sending the wrong message to students
 - b. Who will write college recommendations for students and act as their mentors?
15. Margaret Finitny , President of the Richmond Hill Civic Association opposed the proposal and asserted:
 - a. John Adams has graduated many elected officials and television personalities

- b. John Adams has made improvements and is a landmark
16. Assemblyman Goldfeder opposed the proposal and asserted that schools that are progressing need tools to improve further instead of closing them
 17. Ruben Wills opposed the proposal and asserted that the community should stand up and fight against the proposal and the bullying of City Hall.
 18. Multiple commenters who are current or former students opposed the proposal and stated that the school is like a family and has positive benefits such as:
 - a. Academic opportunities like advanced course work,
 - b. Winning competitions and getting recognized by external agencies
 - c. Offering many different extracurricular programs,
 - d. Saring and dedicated staff and mentors,
 - e. Shared memories and legacy.
 19. Multiple commenters opposed the proposal and stated positive benefits about their teachers
 20. A commenter stood with a former student and stated that the student was a positive example of student success at the school.
 21. Multiple commenters who are current staff members of the school stated positive attributes about themselves as teachers and staff members of John Adams, such as:
 - a. Having high expectations for students, being dedicated, and serving as mentors and creating family-like bonds with students that extend beyond graduations;
 - b. Believing that that effective teaching cannot be demonstrated just by statistics.
 - c. Positive performance on their regents exams
 - d. Assisting students with scholarships and academic opportunities
 - e. Using their personal money to fund things like birthday cards
 - f. Commitment to community services and helping those in need
 - g. Stories of students who thanked them personally for their impact
 - h. Success in sports and clubs, such as winnign championships and recognition for the Model UN program
 - i. Caring for the students
 22. A commenter opposed the proposal and implored the DOE to incorporate critical thinking skills in this decision, and to consider the community's perspective.
 23. A commenter opposed the proposal and asserted that the John Adams does not fit the DOE's criteria for closure.
 24. Multiple commenters opposed the proposal and asserted that the proposal is a result of politics and is the fault of Mayor Bloomberg.
 25. Multiple commenters opposed the proposal and asserted concerns about the school name:
 - a. The school name is a proud name and should not be changed,
 - b. The should name be the name that appear on the graduation certificate for current seniors.

26. A commenter who is a current staff member opposed the proposal and asserted that the rich cultural diversity of the school is a positive benefit.
27. A commenter stated that the 50% replacement rule in the 18D hiring policy is unfair.
28. A commenter disagreed with the idea that John Adams was not improving quickly enough.
29. Multiple commenters stated that the graduation rate has increased and will increase even further by the end of the year.
30. Multiple commenters opposed the proposal and stated that John Adams welcomes immigrants through the Newcomers program, provides ELL services, and is the only school that has a bilingual Bengali program.
31. Multiple commenters opposed the proposal and stated that the school and advocated for:
 - a. More accountability for long-term suspended students
 - b. More support in dealing with involuntary transfers who don't end up attending classes
 - c. More support in developing literacy skills
 - d. More support in serving IEP and ELL students, and students with discipline problems
32. A commenter opposed the proposal and asked the DOE to listen to the feedback provided at the joint public hearing.

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

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

33. James Maguire, SLT member submitted a written testimony of his public comment along with a copy of the powerpoint presentation which he presented at the joint public hearing.
34. A commenter asked what the City is going to do about:
 - a. Remediation at the junior high school level in order to create more high school readiness
 - b. Chancellor's regulario on suspensions and creating more accountability for rehabilitation
 - c. In regard to involuntary transfers, making them more possible to pursue
 - d. In regard to truancy in schools, the commenter offered an idea to create incentives for students to attend school or fines when missing schools, providing more accountability for staff in charge of PINS petitions, and changing the system that would allow schools to involuntarily discharge students who do not show up.
35. A commenter asked why the DOE is proposing to close 26 schools all at once?
36. A commenter asked when did democracy become a joke in the United States?
37. A commenter asked why the Restart model was revoked after just 4 months into the year and whether the City's word is credible.

38. Multiple commenters asked why do we have to change so many of the staff members and what does the DOE expect to accomplish, and would it improve attendance?
39. A commenter asked why bother closing the school if there is “no set limit” regarding the number of staff re-hired at the new school?
40. A commenter asked what will happen to the clubs and extracurricular activities currently offered at John Adams?
41. A commenter asked why the Mayor can’t remove the school from the PLA list.
42. A commenter asked what will happen to the current parent association and school leadership team.
43. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
44. 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.
45. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
46. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
47. 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.
48. One commenter asked what supports are being offered to schools being closed and replaced.
49. 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).
50. One commenter asked about the timeline for the implementation of the new model.
51. 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.
52. One commenter asked about how summer school will be implemented.
53. 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.
54. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.

55. One commenter asked about who makes up the planning team for each school.
56. One commenter asked if the state mandates a JIT review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
57. 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.
58. One commenter asked if the JIT reports are available to the public
59. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
60. One commenter asked if rising ninth-grade students can opt out of a turnaround school.
61. 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?
62. 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.
63. One commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.
64. One commenter asked if a new school replacing a restart school can choose not to keep its EPO.
65. The Queens Borough Delegation of the New York State Senate wrote a letter opposing the closure of 8 high schools in Queens slated to be closed noting:
 - a. The DOE should continue to implement Restart/Transformation at these schools as they have been showing improvement under those models.
 - b. The sudden change has left many communities confused and concerned and that it will have a negative impact students' educational outcomes.
66. 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.
67. A commenter contends that the DOE advised CECs not to offer comment at joint public hearings.

68. A commenter called to express that he is in favor of the proposals and that the homeowners in the schools surrounding John Adams are pleased with the DOE's decision to make drastic changes at John Adams. He reports that there is often fighting in the schoolyard and in the street and the safety officers don't do anything. His children went there and he says that it is a "bad school" and needs to change
69. A commenter identifying himself as a teacher at John Adams submitted a letter via email opposing the proposal.
70. A commenter representing Community Board 9 submitted a resolution summarizing the proposal and questioning the evidence that the Turnaround model will work, and that the proposed closures will harm students and teachers.
71. Multiple commenters submitted emails opposing the proposal and asserting that the proposal is harmful for students, and the school has shown improvement, and is valued by the community.

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

Comments 3(b), 4(f), 4(g) 4(h), 7(a), 7(b), 10,18, 26, 30, , 40, 65 (b), 69, 70, 71 discussed positive elements about John Adams, including instructional programs, Small Learning Communities, SAT preparation, extracurricular activities and partnerships, and that this proposal is harmful to those elements.

By proposing to close and replace the school, the DOE is proposing to implement a strategy that preserves elements of the former school that have led to improvement and positive community feedback, while giving the new school the wherewithal to build upon it and accelerate the pace of change. Thus, the positive aspects of John Adams instructional programs will be incorporated into the plans for the new school.

In particular, as stated in the EIS if the proposal is approved New School will continue to offer Small Learning Communities, and ensure that they are enhanced so that students benefit from developing relationships with fellow students and teachers, and benefit from having a theme-based rigorous academic course of study.. New School also plans to provide students with access to a variety of programs that will provide academic intervention and support services such as CUNYAt Home in College (AHIC), College Now, College Summit, SAT Prep, and Advanced Placement. All schools citywide are implementing instructional programs aligned to the Common Core Learning Standards, as will New School.

Lastly, if the proposal is approved, the DOE will work with New School to ensure the smooth transition of all the current partnerships from John Adams to New School. New School is also expected to offer the same extracurricular activities and clubs as are now offered at John Adams. However, 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. While closing a school maybe a difficult experience for the community, the DOE believes that replacing John Adams with a new school, which preserves the best elements of John Adams 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.

Comments 31, 34 (b-d) advocated for student supporting literacy skills , ELL services, students with disabilities, and to address truancy. In regard to supports for students with disabilities and English Language Learners, the DOE has noted that the Newcomers Small Learning Community will continue to partner with

Internationals Network for Public Schools for in-classroom support such as examining student work to identify areas of improvement, instructional strategies and interventions, and assessing progress against student goals and targets in language acquisition. The DOE understands that each student arrives with a different set of skills and knowledge, and it is important for instruction to be differentiated in order to address each student's needs, New School will continue to offer Integrated Co-Teaching ("ICT") classes, Self-Contained special education ("SC") classes, and Special Education Teacher Support Services ("SETSS") in all SLCs. Students with disabilities will receive mandated services in accordance with their Individualized Education Programs ("IEPs"). New School will offer English as a Second Language ("ESL") mandated services for English Language Learners in all SLCs. John Adams currently offers transitional bilingual programs in Spanish and Bengali. Though John Adams is currently the only high school in the City that offers transitional bilingual program in Bengali, New School is planning to offer this program. New School will also offer a transitional bilingual program in Spanish.

Additionally, the EIS also describes the socio-emotional supports that are currently offered at John Adams and how New School will initiate new programs that support student wellness, and expand existing initiatives that have been successful. There will be an expansion of co-curricular and extracurricular activities for students, including sports, art clubs, theater, journalism club, yearbook club, chess club, robotics club, virtual enterprise club. The New School will expand upon John Adams's successful Model UN program so that more students can participate and benefit from skill building in areas of analysis, debate, and public speaking. New School will build capacity in the Guidance department and to assist college advisors in providing one-on-one and small group college advisement, college access record-keeping, and college awareness supports to students.

New School will work with a primary mental health partner from the Ozone Park neighborhood to provide services to students and families in need. Graduate student social work interns will work under the supervision of the Student Support Social Worker to provide additional counseling to students. Several Student Intervention Teams will be set up and facilitated by Turnaround for Children. These teams will meet regularly to review the highest-risk students' needs and develop and monitor intervention plans for in-school counseling and referral to outside services. New School will also pursue offering the Breakfast in the Classroom program to ensure all students begin their instructional day with a free, nutritious meal. The Breakfast in the Classroom program will support improved attendance, punctuality and behavior, and support student's attention, memory, and achievement. Also, New School will pursue opportunities in creating a School Wellness Council to create an environment to improve nutrition, health, and physical activity opportunities, and create a positive impact across the entire community.

Comments 2, 3 (a), 4(c), 5(a), 5(c), 6, 7(a), 10(e), 15, 18, 19, 21, and 28, 69, 70, 71 assert that there is qualitative evidence of progress and value at John Adams, such as the current staff's dedication, positive engagement with students, safety, and the school's history in the community.

The EIS identifies several areas of success at John Adams, and the DOE recognizes that many members of the community value the school's history. However, the EIS also demonstrates that John Adams is failing students according to a number of performance metrics. While the DOE does not believe that the entirety of the situation is based on the quality of the current teaching staff, it is one significant factor. The DOE encourages the best teachers from the existing school to apply to the new school under the closure and replacement strategy, which allows the best elements of the current school structure to be preserved at the new school. In regard to safety, the DOE expects that New School, like all Citywide schools, will make available the following supports to schools relating to safety and security:

- Providing best practices standards for creating and sustaining a safe and supportive school, as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);

- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and support to Children’s First Network (CFN) Safety Liaisons;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

The DOE has determined that John Adams has struggled to improve, and its performance during the last few years confirms the DOE’s assessment that the school requires a more significant intervention to improve student outcomes. The new structural and programmatic elements that are part of this proposal, and the ability to quickly screen and hire staff who are able to implement those enhancements will allow the DOE to address the core problems that have led to the weak performance.

Comments 3 (b), 3(c), 3(d), 4(a-b), 4(d-f), 7(c), 10(d), 11(d), 16, 28, and 29, 65(a), 70, 71 disagree with the idea that John Adams was not improving quickly enough, asserting that the school has made progress in test scores, attendance and graduation rates.

The EIS acknowledges that John Adams has made some progress in some areas of student progress. In particular, the EIS states:

- The four year graduation rate at John Adams has increased in the past few years, rising from 42% in 2007-2008 to 64% in 2010-2011.¹ The DOE believes that with new programs and a push to improve teacher quality, New School could expand on this recent improvement in overall student outcomes.
- John Adams appears to be having some success in graduating English Language Learners. 66% of English Language Learners graduated in four years, in the 62nd percentile Citywide for this measure. The DOE will seek to preserve John Adams’ efforts to support these students in New School, while implementing new supports to assist other student populations who continue to struggle at John Adams, including students with disabilities.
- While the school’s overall Quality Review score was “Developing” (D), the Review indicated some areas of strength, such as maintaining a culture of mutual trust and positive attitudes toward learning and integrating child/youth development, and providing support services and partnerships with families and outside organizations with the school-wide goals to accelerate the academic and personal growth of students. With the new supports and restructuring available to the new school, we expect that New School will be able to effectively leverage these areas of strength while improving student outcomes for all students.

However, the EIS also makes clear that despite these areas of progress, overall performance at the school has either regressed or not progressed as rapidly as needed:

- The Progress Report measures the progress and performance of students in a school as well as the school environment, compared to other schools serving similar student populations. John Adams earned an overall C grade on its 2010-2011 annual Progress Report, with a C grade on Student Progress, a D grade on Student Performance, and a D grade on School Environment. This represents a decline from an overall B grade in 2009-2010.
- If Regents diplomas alone counted toward graduation—as will be the case for most students in the 2011-2012 school year—the four-year graduation rate at John Adams would drop to just 48%, putting the school in the bottom 31% of high schools Citywide.

¹ Individual school's graduation rates for all years are those reported on the NYCDOE Progress Reports. For the citywide graduation rate, the most recent result available is New York State's calculation for the class of 2010, which was 65.1%. New York State's calculation of New York City's 2011 citywide graduation rate will not be available until New York State completes the verification of the graduation rate and releases it in spring 2012. The Progress Report and New York State graduation rates both include August graduates and are generally similar.

- The school's attendance rate remains below that of most high schools. The 2010-2011 attendance rate was 79%, putting John Adams in the bottom 13% of City high schools in terms of attendance.
- John Adams was rated "Developing" (D) on its most recent Quality Review in 2010-2011.² Quality Reviews evaluate how well schools are organized to support student learning. John Adams' 2010-2011 Quality Review cited a number of serious concerns, including inadequate differentiation of instruction to support individual student needs, and uneven levels among staff of analysis of student work and data to allow teachers to modify teaching practice to support students' individualized needs.

Thus, the DOE has concluded that despite some areas of progress, John Adams should be closed and replaced with a new school.

Comments 1, 3(e), 4(i) 8, 9(b), 11(b), 11(c), 31, 37, 47, 48, 51, 53, 69, 70 criticize the DOE's decision to change the school's federal intervention model from Restart to Turnaround, and inquire about evidence that the Turnaround model will work, and how the DOE will support the school and give it new resources.

As described in more detail in the EIS, in Spring 2011, the DOE applied to SED to place John Adams into the Restart model. SED approved the application, conditioned upon the DOE and UFT agreeing by January 1, 2012 to implement a new teacher evaluation system.

The DOE and UFT failed to reach an agreement on elements of a new teacher evaluation system. This means that the Restart model is no longer available for any DOE school, including John Adams. In the wake of not reaching agreement with the UFT on a teacher evaluation system in these schools, the DOE reassessed the available interventions for PLA schools. For reasons stated in the EIS and provided in the prior response, in the case of John Adams, the DOE determined that a more pervasive intervention was needed to achieve the kinds of student outcomes that are acceptable for current and future students. Closing the current school and creating a new school to replace it was the only way to implement the needed reforms. Consequently, the DOE submitted applications to the State Education Department to implement the Turnaround model, as a way to restore up to \$1,800,000 of SIG funds that will support the New School.

The DOE is hopeful of restoring SIG funding. However, the challenges in this 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.

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 Restart, which is no longer available and was 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. The DOE has previously implemented the Turnaround model in connection with the recent phase-out and replacement of other low-achieving schools. In general, new replacement schools opened by the DOE, done as part of the Turnaround model or not, have a strong track record of success. 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.

² Quality Reviews rate school on the following four-point scale: "Underdeveloped" (the lowest possible rating), "Developing," "Proficient," and "Well Developed" (the highest possible rating). For more information about Quality Reviews, please visit the DOE's Web site at: <http://schools.nyc.gov/Accountability/tools/review>.

- 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.

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

In regard to the supports provided to school, the EIS describes the leadership, instructional, operational and student support provided to John Adams:

Leadership Support:

- Provided leadership training for the principal and assistant principals to help them set clear goals for the school and align teacher practice, student work, and curriculum with citywide instructional expectations while developing the school’s Comprehensive Education Plan and Language Allocation Plan.
- Provided coaching and training sessions to the leadership on implementing plans in support of citywide instructional initiative.
- Provided professional development to assistant principals in designing and executing strategies to improve teacher practice, conducting walkthroughs, and utilizing the Danielson framework to review methods of effective feedback for teachers and promote professional dialogue around pedagogy.

Instructional Support:

- Offered professional development to align curriculum maps with Common Core Learning Standards and review protocols for looking at student work in collaborative teacher teams.
- Offered support and training to teachers in increasing the rigor of instruction and designing assessments to measure students’ conceptual thinking effectively.
- Supported and trained teachers in using various teaching strategies in Integrated Collaborative Teaching (ICT) models for students with disabilities.

Operational Support:

- Advised school staff with fiscal management, including budgeting, procurement, and writing support for iLearn, English Language Learner, and other grants.
- Supported school staff with human resources and building management.
- Assisted school staff with Special Education compliance issues and other supports and strategies for improving instruction and plans for students with disabilities.

Student Support:

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

In addition, as part of the Restart model, John Adams was paired with New Visions for Public Schools (“New Visions”), an Educational Partnership Organization (“EPO”).

Comments 5(b), 9(a), 12, 13, 14(a), 17, and 24 oppose the proposal and state that this proposal is about politics, is evidence of bullying, and is disrespectful to the community. The DOE believes that closing John Adams and replacing it with New School will provide a better educational option to current and future students, which is expected to prompt student improvement more rapidly and with more certainty than previous interventions and supports, which have not led to adequate gains. Thus, this proposal is squarely aimed at improving student achievement. Further, to the extent that this proposal may help secure SIG funding for DOE students, this is an educational aim, not a political one, as these resources are crucial to helping students succeed. However, even if the DOE does not receive SIG funding as a result of this proposal, the DOE believes New School will be better positioned to promote student achievement than John Adams, in light of John Adams's inability to improve quickly.

Comments 7(b) and 14(b) expressed concern related to students seeking college recommendation from the current staff. Students will still be able to request that their teachers write recommendation letters for high school, college, or for jobs. The DOE anticipates that whether or not the teachers remain in the replacement schools, this will not impact their willingness to support students in this manner. Further, the new schools will assist students in locating teachers who may not be employed at the new school following approval of this proposal.

Comments 9(c), 27, 38, 39, 45, and 46 are related to staffing process for the New School. 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"). Per Article 18-D of the DOE's collective bargaining agreement with the UFT, when a new school is created to replace a school that is being phased out or closed, the principal of the new school must develop and implement school-based competencies for hiring teaching staff. Then, a Personnel Committee is created to screen the teaching applicants for the new school using these criteria. At a minimum, Personnel Committee membership consists of two representatives appointed by the UFT President, two representatives appointed by the Chancellor and the principal of the new school. The 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 John Adams who are not hired at New School will remain in excess.

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

Comment 9(d) asks why students at John Adams received a letter about NCLB Public School Choice during this closure process. As stated in the EIS, all students currently attending Title 1 schools that are in Improvement Year 2 status or worse (including PLA schools), like John Adams, are eligible to apply for a transfer to another school through the DOE's existing No Child Left Behind ("NCLB") Public School Choice Process. Thus, students in eligible grade levels enrolled at John Adams are eligible to participate in the NCLB Public School Choice Process regardless of the outcome of the PEP vote. Application packets were distributed to families Citywide in April, after the DOE published the original proposal for the closure of John Adams on March 5. More information about this process can be found at the DOE's Website at:

<http://schools.nyc.gov/choicesenrollment/changingschools/default>

Comments 22, 32, 35, 36, and 44 are critical of the DOE's process for seeking out feedback from the community. 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. Then, 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. This proposal was published on March 5, 2012, and amended on March 16, and amended again on April 20. The DOE solicited feedback from parents through the Joint Public Hearings, which was held on April 19, 2012, as well as through voicemail and email. Parent feedback is provided 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 community members may disagree with the proposal, the DOE believes it is the right decision for students.

Comment 23 stated that John Adams does not fit the DOE's criteria for closure. This is an inaccurate statement. In a concerted effort to ensure that all students have access to high-quality schools, the DOE annually reviews the performance of all schools Citywide. Schools designated as Persistently Lowest Achieving by the State Education Department receive special attention during this review. Specifically, for PLA schools, the Department looks at whether one of the federally-approved intervention models can adequately address the school's needs or whether another intervention is more appropriate. These models include Turnaround, which in New York State is implemented through either the closure or phase-out of the PLA school.

Comment 25 is related to the school name and decisions around which name will appear on the graduation certificate. The proposal calls for John Adams to be closed and replaced with a new school. While the DOE acknowledges the history of the John Adams name, a new school needs a new name and school identification number (DBN). As with all school names, the Chancellor retains final decision-making authority. At this time, the DOE is investigating whether the School August Martin may be listed on the graduation certificate for students who graduate in August. Schools will be provided with further guidance on this process after the PEP. Graduates in future years will receive diplomas from New School.

Comment 34(a) inquired as to what the DOE is doing to address student remediation at the junior high school level to create more high school readiness. Starting with 18 middle schools this year, the DOE has launched the Middle School Quality Initiative, providing intensive training and professional development for teachers to help

their students improve literacy. At these schools, students are working inside and outside the classroom to improve their reading and writing—focusing especially on nonfiction texts.

In the fall, the Middle School Quality Initiative will expand to a number of other middle schools, and eventually culminate in a comprehensive literacy strategy for all middle schools, based on the important work we've done at these 18. Along with this intensive work, we have also shifted our resources to ensure that every middle school library is stacked with non-fiction texts that students need to prepare for high school and beyond. For the next two years, we have allocated \$15 million for non-fiction textbooks in science and social studies, among other subjects. For more information on these efforts go to:

http://schools.nyc.gov/Home/InOurSchoolsToday/2011-2012/NYU_MS_Colloquium.htm

Comment 41 asked why the Mayor could not simply remove the school from the PLA list. The PLA designation is made by the New York State Education Department (“SED”), not the mayor or the DOE, based on SED’s chosen performance metrics. Thus, only SED can remove a school’s PLA designation.

Comments 42, 55 asks what will happen to the current parent association and school leadership team and inquires who comprises the planning team for the new school . The new school will need to establish a new School Leadership team (SLT) and Parent Association (PA). Consistent with Chancellor’s Regulation A-655, the new school will follow the process for establishing a new SLT. Consistent with Chancellor’s Regulation A-660, the new school will follow the process for establishing a new PA. School planning teams for each school are typically 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 50, 54, 59, and 60 ask about the timeline for the implementation of the new model, and enrollment options for incoming students.

As described in the EIS, the DOE is proposing to immediately replace John Adams with New School (27Q570, “New School”), a new district high school which will serve students in grades nine through twelve beginning in September 2012. If this proposal is approved, John Adams will close at the conclusion of the 2011-2012 school year. All current students who have not graduated before the start of the 2012-2013 school year will be guaranteed a seat at and automatically enrolled in New School.

In New York City, the High School Admissions Process is a Citywide choice process. (Please see “Enrollment Impact for Future High School Students—High School Admissions Process” below for more detailed information.) The High School Admissions Process permits an applicant to list up to 12 high school programs in order of preference on his or her application. High school admissions applications were due December 2, 2011. Throughout the City, students who are in ninth grade for the first time can participate in the High School Admissions Process and can apply to attend a different high school for tenth grade. Current ninth-grade students at John Adams who are interested in attending a different school for tenth grade may have already taken part in this process by submitting an application on or before December 2, 2011. Current first-time ninth-grade students at John Adams who have not yet taken part in this process, but now wish to do so, may submit an application during Round Two of the High School Admissions Process in March.

In March, such students may submit a Round Two application and rank their preferences for schools that have available seats for tenth grade. Round Two matches are made in April. If a student also received a match through Round One of the High School Admissions Process, a match received in Round Two will nullify the Round One match.

The DOE believes that New School will support student success at a level that the current school cannot, and

therefore all students are encouraged to take advantage of their guaranteed seat in the new school.

In regard to over-the-counter students and student demographics, while the DOE cannot predict the exact number of students who will apply to a particular high school through the High School Admissions Process or the number of students who will arrive through an OTC placement, the following analysis uses the data from the 2011-2012 school year to approximate future needs. Of the 491 ninth-grade students who were admitted through the High School Admissions Process, 11% are students with disabilities and 12% are ELL students. Of the 204 students who arrived through an OTC placement, 22% are ELL students. Given that the New School is expected to enroll approximately the same number of students that John Adams currently serves, the New School may also enroll similar numbers of OTC students at New School. 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.

Comment 52 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.

Comments 56, 57, and 58 ask about the requirements of a JIT review from the NYSED, whether JIT reviews were conducted for all 26 schools proposed for closure, and whether the results of the reviews are available publicly. Newly identified Restructuring (year 1) schools, schools in Restructuring Advanced and Persistently Lowest Achieving/ Schools Under Registration Review (PLA/SURR) schools are subject to a NYSED review by a Joint Intervention Team (JIT). JITs that were conducted during the 2010-2011 and 2011-2012 school years may be found at http://www.p12.nysed.gov/accountability/School_Improvement/JITReports.html. JIT reviews conducted during the 2009-2010 school year may be obtained from the District Superintendent’s Office or Elizabeth Iadavaia, Senior Director of School Improvement, at Eiadava@schools.nyc.gov

Comments 61, 62, 63 are related to the SIG funding and asked whether the \$58 million designated to New York City represents what was suspended as of January 3, 2012, whether schools will automatically receive SIG funding, and how much funding schools would receive. 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 EIS, outstanding funding for the Turnaround and Restart schools was suspended by the New York State Education Department after the DOE and UFT were unable to reach an agreement on a new teacher evaluation system by January 1, 2012. The DOE is hopeful that this SIG funding will be restored to some of these schools based on the new SIG proposals submitted to SED in March 2012. If the State approves the DOE’s application to place New School into the Turnaround model, New School will be eligible for up to \$2M per year as part the School Improvement Grant program. However, the challenges in these schools are too great, and the need to overcome those challenges is too urgent, to not take immediate action to address key aspects of the school’s culture, systems, and staffing, whether or not SED ultimately authorizes funding.

Comment 63 inquires whether the DOE will have to repay the funding spent on the contracts schools began under the Restart model. 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 64 asks if a new school replacing a restart school can choose not to keep its EPO. The decision whether or not to partner a new school with an EPO will be made on a case by case basis by the DOE. In many cases, EPOs have begun implementing improvement strategies with students at the closing school that we believe should be continued at the new school. For more information about the specific plans of the new school, including potential EPO partnerships, please see the EIS posted here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/April2012Proposals.htm>.

Comment 43 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 59 concerns whether the new school will serve over-the-counter, ELL and/or over-age under-credited students. As stated in the EIS, new schools replacing closed schools will serve all types of students, including over-the-counter ("OTC") students, English language learner ("ELL") students, students with disabilities, and over-age, under-credited students. For more specific information, please refer to the EIS describing the proposal.

Comment 66 refers to a petition opposing the proposals to close and replace schools, which was signed by approximately 1,300 people. 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.

Comment 67 stated that CECs had been advised by the DOE not to offer comment at joint public hearings. This is not true. In fact, the DOE worked with the CECs to confirm their attendance at the hearings, sent proposed agendas to all mandated hearing parties (including CECs), and welcomed CECs to make presentations at the hearing. Indeed, many CECs elected to make presentations. For example, CEC 27 made a presentation at the John Adams hearing, and CEC 30 made a presentation at the W. C. Bryant hearing.

Comment 68 is in support of the proposal.

Changes Made to the Proposal

On March 16, 2012 the DOE published an amended EIS to correct a typographical error on page 21 and identify the transportable unit occupied by John Adams. On April 20, 2012 the DOE published a second amended EIS which corrected a different typographical error on page 21 referencing the numbers of ninth grade students entering the school through the High School Admissions Process and through Over-the-Counter placement. The second amended EIS also identified an additional annex building occupied by John Adams, and included additional information about Q480 and Q781 in Section VII.