



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of Richmond Hill High School (27Q475) and the Opening of a New School (27Q369) in Building Q475 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 Richmond Hill High School (27Q475, “Richmond Hill”), an existing district high school located in building Q475 (“Q475”) and transportable classroom unit Q944 (“Q944”), located at 89-30 114 Street, Queens, NY 11418, within the geographical confines of Community School District 27. Richmond Hill currently serves students in grades nine through twelve. The DOE is proposing to immediately replace Richmond Hill with New School (27Q369, “New School”), a new district high school serving students in grades nine through twelve in Q475 and Q944.

If this proposal is approved, Richmond Hill 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.

Richmond Hill admits students through the Citywide High School Admissions Process through a zoned method and an educational option method, and offers two Career and Technical Education (“CTE”) pathways. New School is planning to continue programming in all of the same CTE career clusters that Richmond Hill currently offers and, therefore, students enrolled in CTE programming at Richmond Hill would have the opportunity to enroll in CTE programming at New School.

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 Richmond Hill and replacing it with New School, the DOE is seeking to expeditiously improve educational quality in Q475 and Q944.

If this proposal is approved, New School will develop rigorous school-specific competencies to measure and screen prospective staff – including former Richmond Hill 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 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 Richmond Hill and incorporate new elements, including new talent, designed to better meet student needs. Thus, the immediate closure and replacement of Richmond Hill 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 Richmond Hill.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building Q475 on April 18, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 500 members of the public attended the hearing, and 68 people spoke. Present at the meeting were: Representatives of the School Leadership Team Mr. Herde, Miss Fana, Miss Best, Miss Gourgue, Mr. Dibenedetto, and Miss Stewer. Elected Officials represented at the meeting included: Assemblymember Michale Simanowitz, Councilmember Elizabeth Crowley, Queens Panel Member Dmytro Fedkowsyj, Assemblymember Michale Miller, District Leader Albert Baldo, Representative Meeks, and Councilman Ruben Wills.

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

1. Several commenters (including representatives of the SLT, Assemblymember Michael Simanowitz, Councilmember Elizabeth Crowley, and the Queens PEP appointee, Dmytro Fedkowsyj) voiced general opposition to the proposal.
2. Multiple commenters (including members of the SLT, Assemblymember Michael Simanowitz, Councilmember Elizabeth Prowely, and Assemblymember Michael Miller) voiced general support for Richmond Hill as well as the students, staff, teachers, and leadership.
3. Multiple commenters, including members of the SLT, asserted that positive student growth and achievements have taken place at Richmond Hill. More specifically, multiple commenters, including members of the SLT, stated that Richmond Hill had an improved graduation rate and that should indicate the growth taking place at the school, instead of place it on the list for closure.
4. Multiple commenters stated the Saturday Academy and Small Learning Community Academies had a positive impact on students and suggested that more funding be put into these programs to help the school succeed. Many commenters also inquired as to whether this programming would continue if the proposal is approved.
5. Many commenters (including Dmytro Fedkowsyj, the Queens PEP appointee) voiced support for the Restart Model and inquired as to why the Restart Model was stopped only four months into its implementation at Richmond Hill.
6. Two commenters stated that the community was not consulted for feedback concerning the possible implementation of the Turnaround model, or what the commenters characterized as therevocation of the Restart model.
7. Several commenters voiced general opposition to the Turnaround Model.

8. Several commenters inquired as to why the resources available for the Turnaround model cannot be given to Richmond Hill now to help the school improve.
9. Several commenters stated the belief that the mayor is using Turnaround proposals as a political means of challenging the teacher and principal unions.
10. One commenter asserted that the Turnaround proposals disproportionately impact socioeconomically disadvantaged communities and communities with high minority populations.
11. One commenter inquired as to how changing the name of the school will make it a better school.
12. One commenter asked how the Turnaround Model will help improve student achievement outcomes.
13. Scott Wolf, representing Assemblymember Michael Simanowitz, noted that a recent study conducted by the Urban Youth Collaborative shows that of the 33,000 students from 21 high schools closed between 2000 - 2009, 5,162 students dropped out and stated that this is evidence that school closure is not an effective policy to help improve student achievement.
14. Several commenters raised concerns about the emotional impact that the school closure and change in staff will have on the students currently attending Richmond Hill.
15. Several commenters stated that proposing a school for closure sends a negative message to the school's students about their ability to achieve and perform well academically.
16. One commenter stated that the Turnaround policy teaches students to disrespect their teachers and this attitude negatively impacts student learning.
17. Several commenters noted that seven schools had been removed from the turnaround list and proposed that Richmond Hill also be removed from the list of Turnaround schools.
18. One commenter inquired as to how the schools removed from the Turnaround list were able to be removed from the Turnaround list.
19. One commenter expressed the belief that the school will never receive the funding that the Turnaround proposal indicates it will receive.
20. One commenter asserted that if Richmond Hill takes back more than 50% of its original staff, the school will not receive the 1.8 million dollars of funding that the DOE states it will receive.
21. Multiple commenters asked how teachers will be cut and how new teachers will be selected in the hiring process.
22. One commenter expressed expressed the belief that the new school leader will hire the cheapest and least experienced teachers instead of hiring the best teachers for the school community.
23. One commenter stated that the panel that hires the teachers at the new school is supposed to have a parent on the committee and expressed concern that this would not actually happen since it was not mentioned during the hearing.
24. Several commenters stated that bringing in new teachers will disrupt student learning and negatively impact the culture of learning because it will take a long time for students to adjust to the new environment and new teachers.
25. Several commenters, including representatives of the SLT, inquired as to how students will be able to get letters of recommendation from their staff if they are no longer working in the Richmond Hill school building.
26. Multiple commenters expressed the belief that Richmond Hill's data indicates overall progress and inquired as to why the school was still slated for closure.
27. Several commenters asked how the DOE considers factors that cannot be measured through quantitative data such as teacher-student relationships and support for the personal growth of the students.

28. Multiple commenters noted that many students face challenges outside of the classroom and inquired as to how those are taken into consideration when evaluating the progress of students and schools.
29. One commenter asked why the DOE is focusing on the prior statistics of the school and not the current statistics that demonstrate the school's growth and improvement.
30. Multiple commenters noted that the large, diverse population that Richmond Hill serves has unique language and cultural needs that should be taken into consideration in the evaluation of the school's overall performance.
31. One commenter said that the size of Richmond Hill should have been taken into consideration in considering the school's peer group because it does not seem equitable to compare Richmond Hill to 34 small schools and 6 large schools, especially when Richmond Hill has a total of 2,100 students and is compared to schools like Bronx Bridges that has a population of 78 students, Rockaway Park High School that has a population of 87 students, and Urban Action Academy that has a population 246 students.
32. One commenter stated that the Peer Index rating is unfair and does not accurately reflect student achievement or school progress since the index only takes a small amount of students' challenges into consideration.
33. Scott Wolf, representing Assemblymember Michael Simanowitz, stated that Richmond Hill was originally built to accommodate 1,800 students, but enrollment grew to 3,500 and has only been reduced in the last 2 years. He further noted that this overcrowding has resulted in peculiar class and activity scheduling but Richmond Hill has persevered despite those challenges.
34. One commenter stated the school struggles with performance because the school administration does not have the capability to transfer students who do not want to be at the school.
35. Multiple commenters stated that the school struggles with its performance because many students enter the school with different academic challenges, behavioral issues, and varying levels of need.
36. One commenter stated the school experiences performance challenges because some students placed at the school may be better served in CTE schools or different learning environments.
37. One commenter stated that students' suspensions are part of the reason why the school's statistics indicate that it is struggling with its performance and the DOE should take suspensions into consideration when evaluating a school's performance.
38. One commenter stated that students enter with a variety of challenges that cause them to take longer to graduate and the school should not be penalized for that.
39. One commenter stated that the attendance issues at the school were caused by a small percentage of students at the school "who have no intention of coming to class."
40. One commenter stated that the school faces safety issues because the school administration does not have the right to expel the "worst troublemakers."
41. One commenter stated that the school faces safety challenges because the DOE has done nothing to help the school resolve its safety issues.
42. One commenter stated that the school safety survey is not clear because when families respond to the question about feeling safe "in" the school, they think the question is about the surrounding area, not just the school itself.
43. Multiple commenters stated that there is a strong sense of community at the school and students felt safe in the school.
44. Several commenters expressed the important role internship opportunities have provided for Richmond Hill students and asked if these internship opportunities would still be available if the school is approved for closure.

45. Many commenters acknowledged the positive impact of the school's athletic programming, and asked what sports programs would be cut if the proposal for closure is approved.
46. One commenter asked what educational opportunity programs will continue to be offered if the proposal is approved.
47. One commenter asked what music and art programs will be cut if the proposal for closure is approved.
48. One commenter asked how the school's closure will impact the parent associations currently operating at the school.
49. Multiple commenters asked why the proposed new leader has already visited and been introduced to the school community before the proposal has been voted on by the PEP.
50. One commenter inquired as to why the Division of Portfolio Planning and Children's First Network scheduled a principal introduction meeting for April 19th, the same night at the PTA meeting, without consulting the PTA.
51. One commenter inquired as to why the DOE already told the principal her last day when the proposal has not yet been voted on by the PEP.
52. One commenter asserted that the proposed new leader is not qualified to lead Richmond Hill.
53. Several commenters stated the belief that the history and legacy of the school is very important to the community, and the closure of the school would negatively impact its important historical role in the community.
54. Several commenters acknowledged the diverse population that Richmond Hill serves and the importance of continuing to serve and support that population.
55. Multiple commenters expressed concern that their younger siblings would not be able to attend Richmond Hill in the future if the proposal to close the school is approved.
56. One commenter stated that the DOE doesn't take the population of schools into consideration and demonstrate care for the students when you label them as PLA instead of requiring support.
57. One commenter stated that the DOE needs to consider cultural barriers when creating proposals and find creative ways of reaching out to school communities to receive feedback, especially in cases where populations may be hesitant to speak out for fear of retribution.
58. Multiple commenters stated that there were not enough DOE supports in place to help the school succeed and asked why more supports weren't being given now.
59. One commenter voiced support for the implementation of the Turnaround policy at Richmond Hill.
60. One commenter noted that a mayor's event was recently held to celebrate the school's service and it is now being proposed for closure, which sends contradictory messages to the school community.

The following questions were submitted during the question and answer portion of the joint public hearing:

61. If the proposal goes through, what happens to the students who graduate in August? What will their diploma say? Which school gets credit for these processes?
62. If the school is closing in June and all staff members are excessed, how will the school be ready in September?
63. If the school is closing in June and all staff members are excessed, who will do the programming?
64. If the school is closing in June and all staff members are excessed, who will be the new deans?

65. How does the DOE announce a school may close one day, and the next day call the school and say that its program is a model for all schools? Who do you think made it happen? Whose vision is it? Isn't it the principal's vision?
66. What's the mayor's plan to address parental involvement in the school?
67. Ruben Wills, a district leader, noted that many elected officials have put a lot of funding into this school and would like to see it succeed.
68. One commenter noted that parents take an active role in the school community.
69. One commenter noted that there is increased student involvement in the school community.
70. One commenter expressed the belief that closing the school opens the DOE up for a lawsuit.
71. One commenter expressed concern that the teachers and staff don't reflect the diversity of the
72. One commenter expressed concern that school documents are not translated into Hindi despite the need for these translations within the school population and larger surrounding community.
73. One commenter acknowledged that the school previously had a JIT review.
74. One commenter stated that Richmond Hill should not be penalized for truancy since it is a challenge faced throughout the nation.
75. One commenter stated that the Regents are not a fair measure of student growth because the tests are constantly changing.
76. Dmytro Fedkowskyj, the Queens PEP appointee, stated that he has helped create a PEP resolution to abandon the Turnaround model and will be supporting this resolution at the April PEP meeting.
77. One commenter expressed concern about transforming Richmond Hill's large school into the small school model and expressed uncertainty that it would be effective in this particular school community.
78. One commenter inquired about the 2001 lawsuit for fiscal equality and noted that he believed schools should be receiving more funding as a result, but have not yet received the appropriate funding.
79. Two commenters (including a representative of Council Member Elizabeth Prowley, Kate Mooney and District Leader James Vasquez) stated that the trailers have been at the school for more than ten years.

The following questions were submitted during the question and answer portion of the joint public hearing and are not related to the proposal:

80. What will the mayor do about the language barriers we face in our community in relation to the parents?
81. What will you do to accommodate schedules of single parents working multiple jobs but who cannot be involved in their children's academic lives?

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

82. One commenter stated general opposition to DOE policies and initiatives.
83. One commenter asked what happened to the two million dollar of taxes paid for education in New York City.
84. One commenter asserted that the DOE needs to listen more to the surrounding community.
85. Several commenters voiced general opposition to the current mayoral administration.
86. Several commenters voiced general opposition to the DOE.
87. One commenter voiced general opposition to mayoral control of New York City schools.

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

The DOE received approximately 2,500 comments through a petition that was submitted, approximately 50 comments through the dedicated email address and website, and 16 oral comments through the dedicated phone line for this proposal.

88. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
89. 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.
90. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
91. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
92. 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.
93. One commenter asked what supports are being offered to schools being closed and replaced.
94. 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).
95. One commenter asked about the timeline for the implementation of the new model.
96. 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.
97. One commenter asked about how summer school will be implemented.
98. 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.
99. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.
100. One commenter asked about who makes up the planning team for each school.
101. One commenter asked if the state mandates a JIT review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
102. 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.
103. One commenter asked if the JIT reports are available to the public
104. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
105. One commenter asked if rising ninth-grade students can opt out of a turnaround school.
106. 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?

107. 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.
108. One commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.
109. One commenter asked if a new school replacing a restart school can choose not to keep its EPO.
110. The petition forwarded by approximately 2,500 people asked the DOE to
 - a. Withdraw the Richmond Hill proposal because of improved graduation rates, attendance, and test scores
 - b. Allow the Richmond Hill community to main its current relationships and school culture
 - c. Allow Richmond Hill to continue through the three-year plan of Restart
 - d. Give Richmond Hill back the SIG money awarded to the school
 - e. End the policy of school closures because it causes instability and undermines the school
111. Multiple commenters expressed support for Richmond Hill as well as the students, staff, teachers, counselors, and leadership.
112. Multiple commenters stated that Richmond Hill supported students and helped them to achieve positive outcomes both personally and academically.
113. Multiple commenters voiced general opposition to the proposal to close Richmond Hill.
114. Multiple commenters voiced general opposition to the policy of school closures.
115. Multiple commenters voiced general opposition to the Turnaround model.
116. Multiple commenters expressed general support for the Restart model.
117. Multiple commenters expressed frustration that Richmond Hill was initially placed into the Restart model and granted SIG funding accordingly, but is now being slated for closure and may enter the Turnaround model.
118. One commenter stated that this school was designated for SIG funding in July 2011, and is currently still implementing many new programs under this funding. The commenter asserted that this funding will continue until 2013 and inquired as to why the school is being closed before this termination date.
119. Multiple commenters stated that the SIG grant should be reinstated to all schools that received it under the Restart model.
120. Multiple commenters stated that the DOE did not give Richmond Hill enough time to employ the Restart model and allow that model to help improve the school's performance.
121. Multiple commenters voiced concern about students adjusting to the new school and the new staff.
122. One commenter asked who the new teachers will be.
123. One commenter asked how the DOE expects the school to adequately interview all the teachers currently at Richmond Hill, all the other teachers who may or may not be rehired in their own closed schools, and new graduates who want to become teachers within the next three months.
124. One commenter asked when all the teachers will get trained and prepared for the Fall 2012 term.
125. One commenter asked if the school made any improvements since July 2011, and if so, the commenter expressed the belief that they should be allowed to continue making progress with the present staff.
126. One commenter stated that closing this school and bringing in new staff will create more inconsistency in students' lives, and will thereby negatively impact student progress.
127. One commenter inquired as to how the proposed closing is affecting the morale of the staff.
128. One commenter stated that this proposal will cause anxiety and stress for the teachers and students at Richmond Hill.

129. Multiple commenters stated that the school's overall data has improved and this indicates that the school should not be slated for closure.
130. Multiple commenters stated that goals set by the DOE and the data used to measure them do not take into account special needs and circumstances of the unique population at Richmond Hill.
131. Multiple commenters noted that Richmond Hill has a high population of ELL and Special Education students and this should be taken into consideration in the evaluation of the school's performance.
132. Multiple commenters noted that student attendance has improved at Richmond Hill.
133. One commenter stated that it is unfair that the school is rated on attendance but the government agencies in place to deal with truancy (i.e. ACS or PINS petition) are ineffective.
134. Multiple commenters noted that the school's graduation rate improved by approximately twenty-two percent.
135. One commenter stated that the DOE does not recognize that high need students learn at different rates and may need additional time to complete graduation requirements.
136. One commenter stated that almost all of the students' grade point averages went up.
137. One commenter expressed that it is unfair for the school to be rated on student performance when students arrive at the school with widely varying skill levels.
138. Multiple commenters stated that Richmond Hill improved the surrounding community.
139. Multiple commenters expressed feeling safe at Richmond Hill.
140. One commenter stated that safety factors are impacted by the lack of proper recourse available to schools when dealing with chronic offenders (i.e. Suspension is not a deterrent).
141. Multiple commenters stated that there is a strong sense of community at Richmond Hill.
142. Multiple commenters acknowledged the history of the school as well as the important role it currently plays within the surrounding community.

143. Multiple commenters expressed support for the freshmen academy program.
144. Multiple commenters noted the importance of the athletic programming available at Richmond Hill.
145. One commenter voiced support for the after school programs available at the school.
146. One commenter noted the positive impact of the assemblies that take place every month to promote student involvement and recognize student achievement.

147. Two commenters stated that families have already spent money on Richmond Hill's school uniforms and it would be costly for families to have to purchase new uniforms for the new school.

148. One commenter stated that the proposal to close Richmond Hill is a part of the mayor's agenda to close large New York City high schools and remove them from the evaluation system.
149. One commenter stated that the opposition expressed at joint public hearings is not taken into consideration in making the decision about the proposal.
150. One commenter, representing community board 9, asked for more information regarding the proposal for the closure of Richmond Hill.
151. The DOE received a draft resolution to be presented to the PEP which calls on the DOE to refrain from closing schools and raises the following concerns:
 - a. The sudden shift in school improvement strategy may destabilize thousands of students in primarily large, comprehensive high schools

- b. Mandating the replacement of teachers and principals according to rigid and fundamentally arbitrary criteria without offering ample professional development opportunities will penalize the very people who have made significant improvements in several of the high schools now subject to Turnaround
 - c. The DOE has put forth no evidence since this decision was made that Turnaround will actually improve educational opportunities
 - d. The DOE has pointed to no federal or state law or regulation that demonstrates the NYC DOE has been prohibited from continuing with the Restart and Transformation models if it chooses to do so.
 - e. The NYC DOE has claimed that millions in federal dollars are at stake but has failed to acknowledge that it is not certain that the “new” schools opening as replacements will in fact receive the suspended SIG funding, and to the extent that effective teachers who are not rehired and are placed into the ATR pool could cost the city millions
152. The PEP resolution submitted also asks that the DOE
- a. Withdraw all proposals for significant changes in school utilization and EISs that involve a shift from Transformation and Restart Models
 - b. Impose a moratorium on all school Turnaround proposals until public presentations are made in every borough reflecting on how this method will raise student achievement in lieu of existing models
 - c. Conduct school-by-school transparent reviews of our current school improvement strategy to assess which measures and programs have been effective
 - d. Examine all school intervention plans that are in place under Restart or Transformation
 - e. Ensure that all struggling high schools are given adequate support so that the students will graduate and receive the quality of education that will make them college- or career- ready.
153. One commenter contended that the DOE advised CECs not to offer comment at joint public hearings.
154. 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.
155. 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.

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

156. One commenter stated that the DOE should focus on reducing class sizes, providing more assistance to new student immigrants, and finding new ways to make parents accountable for their children's education.
157. Two commenters expressed support for the uniform policy at Richmond Hill.
158. One commenter stated that students in the main building only have one restroom that is located on the first floor and suggests that adding another school to this building would create a challenge for restroom usage.
159. One commenter stated that there are six science labs in the main building and asked how splitting a school into two organizations can account for this, especially when these labs are located in one specific corridor of the second floor.
160. One commenter noted that there is one library in the main building and asked where another library will be placed and if it will be sited in a classroom and thereby take space that would originally be given to a class section.
161. One commenter inquired as to how two schools will be able to use Richmond Hill's small lunchroom.
162. One commenter stated that the school has gym spaces one on the first and second floors, noting that the second floor gym is connected to the girl's locker room and the boy's locker room is connected to the first floor gym. The commenter then inquired as to how this can be shared by two schools, especially considering the fact that gym is a requirement for high school graduation.
163. One commenter stated that making two schools out of one larger school organization is going to take away classroom space.
164. One commenter stated that the DOE can do a better job utilizing technology to keep track of students.
165. One commenter acknowledged that Richmond Hill has a new Web site that gives access to parents to track their child's performance, and expressed her belief that this is helpful for the school community.
166. One commenter stated that students in all grade levels should be able to go on trips to visit colleges.
167. One commenter stated that students should be given encouragement in all grade levels.
168. One commenter stated the positive impact of inter-disciplinary classes in public high schools.
169. One commenter expressed the belief that students should receive counseling from three main advisors in their freshmen year, and then receive advising in a specific cohort when they decide upon an academic discipline.
170. One commenter stated that Richmond Hill should have more arts funding and programming available for students.
171. One commenter stated that Richmond Hill should have a bigger science fair, and the school should receive more funding for its science labs.
172. One commenter stated that more tutoring services and service learning should be offered at Richmond Hill.
173. Multiple commenters voiced general opposition for the current mayoral administration.

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

Comments 1, 7, 67, 76, 110, 113, 152 (a, b), 155 (a) expressed general disagreement with the proposal. As stated throughout the EIS and in this analysis of public comment, 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.

Comments 2, 44-47, 110 (b), 111, 143, 144, 145, 146 discussed positive elements about the school including instructional programs, after school programs, Small Learning Communities, internships, sports, music, arts, student assemblies, and expressed concern whether these would be offered at the New School. 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 Richmond Hill instructional programs and will be incorporated into the plans for the new school.

In particular, the EIS states that SLCs at Richmond Hill are supported by a federally-funded grant, which was awarded through June 2013. The DOE has been informed by the U.S. Department of Education that, if this proposal is approved, the grant will be transferred from Richmond Hill to New School. Furthermore, Richmond Hill has begun the process to create two new career-aligned programs of study, one in Finance (aligned to the Business and Finance SLC) and the other in Health Sciences (aligned to the Health and Fitness SLC). These programs are both in their initial year of planning with the National Academy Foundation. New School will seek to initiate an application for these two programs and turn them into formal CTE programs that will lead to CTE certification. Finally, for the last three SLCs, New School will build upon the sequences of study that already exist at Richmond Hill and determine whether there is industry-related recognition that would be possible to acquire for these programs. For example, the Forensics SLC at Richmond Hill has a three-year course sequence in development. Though there is no formal CTE certification for forensics careers (e.g. law enforcement), New School may pursue adding volunteer and work experience opportunities for students in this SLC. New School will consider similar career-based opportunities for students in the Design and Engineering SLCs.

New School will continue to provide advisories for “at risk” students to have an opportunity to develop a supportive relationship with a mentor. New School will also ensure ample supports for struggling students by expanding the peer tutoring program during the school day, and expanding the after-school program and Saturday Institute to include Regents preparation, tutoring, and rigorous courses and programs to help seniors meet graduation requirements.

The EIS also describes the socio-emotional Supports that are currently offered at Richmond Hill and how New School will initiate new programs that support student wellness. For example, 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

Lastly, if the proposal is approved, the DOE will work New School to ensure the smooth transition of all the current partnerships from Richmond Hill to New School. New School is also expected to offer the same extra-curricular activities and clubs as are now offered at Richmond Hill. 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 Richmond Hill with a new school, which preserves the best elements of Richmond Hill 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 2, 27, 43, 53, 60, 65, 110 (a), 111, 112, 130, 135, 138, 139, 141, 142, 152 (c) assert that there is qualitative evidence of progress and value at Richmond Hill, such as the current staff's dedication, positive engagement with students, family involvement, student involvement, safety, the school's history in the community, and also reference an event in which the Mayor celebrated the school's service. The EIS acknowledges several areas of relative strength at Richmond Hill, and the DOE recognizes that many members of the community value the school's history. However, the EIS also demonstrates that Richmond Hill is failing students according to a number of performance metrics. The DOE has determined that Richmond Hill 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 14, 16, 24, 121, 126, 151 (a), 155(b) assert that the proposal harms students emotionally and state that it sends a negative message to students. While closing a school maybe a difficult experience for the community, the DOE believes that replacing Richmond Hill with a new school, which preserves the best elements of Richmond Hill 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. Richmond Hill 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 and plan to be preserved at the new school. In this way, current and future students will benefit from this proposal.

Comment 133 addresses students attendance and states that it is unfair that the school is rated on attendance but the government agencies in place to deal with truancy are ineffective. Student attendance rate is just one factor that is considered in a decision to close and replace a school. Additionally, student attendance is not a factor in determining a school's State PLA status.

Comments 3, 26, 29, 110(a), 120, 125, 129, 130, 132, 134, 136, 152 (c, d), 155(a) disagree with the idea that Richmond Hill was not improving quickly enough, asserting that the school has made progress in test scores, attendance and graduation rates. The EIS acknowledges that Richmond Hill has made some progress in some. In particular, the EIS states:

- The graduation rate at Richmond Hill has shown some increase in the past few years, rising from 41% in 2007-2008 to 59% in 2010-2011. The DOE believes that with new programs and a push to

improve teacher quality, the New School could expand this recent improvement to overall student outcomes.

- While the school’s overall Quality Review score was “Developing,” the Review indicated some areas of strength, such as administrative use of a wide range of assessment data to determine school-wide needs. With the new supports and restructuring available, we expect that the 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:

- Graduation rates at Richmond Hill have been consistently low for over five years. In 2010-2011, Richmond Hill’s four-year graduation rate (including August graduates) was 59% — well below the Citywide graduation rate of 65.1% and in the bottom 22% Citywide.¹
- 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 Richmond Hill would drop to just 49%, putting the school in the bottom 33% of high schools Citywide.
- The Progress Report measures the progress and performance of students in a school as well as the school environment, compared to other schools serving similar student populations. Richmond Hill earned an overall D grade on its 2010-2011 annual Progress Report, with a C grade on Student Progress, an F grade on Student Performance, and an F grade on School Environment.
- The school’s attendance rate remains below that of most high schools. The 2010-2011 attendance rate was 80%, putting Richmond Hill in the bottom 16% of City high schools in terms of attendance.
- Safety issues have been a concern at the school in recent years. On the 2010-2011 New York City School Survey, only 70% of students reported feeling safe in the hallways, bathrooms, and locker rooms. This response is in the bottom 13% of high schools Citywide. In addition, only 68% of teachers reported that discipline and order were maintained at the school.
- Richmond Hill 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. Richmond Hill’s 2010-2011 Quality Review cited a number of serious concerns, including the need to deepen student engagement by creating rigorous academic tasks based on State standards that are consistent across grades and subjects and meet the needs of a variety of learners, to broaden data utilization practices at the classroom level to ensure that the needs of student subgroups are identified and addressed, and to extend the use of the school’s observation tool to foster the development of school-wide instructional practices and encourage teachers to reflect on their practice and professional growth to establish a coherent school culture.

In addition, the school remains on the state’s list of PLA schools. As a result, the DOE concluded that students would be best served by closing the school and replacing it with a new school.

¹ Individual school graduation rates are given by the New York City graduation rate calculation as reported on the DOE Progress Reports. For the overall New York City graduation rate, the most recent available is New York State’s calculation for DOE students, which was 65.1% for the class of 2010. 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. New York City and New York State graduation rate calculations both include August graduates and are generally similar.

² Quality Reviews rate school on the following four-point scale: “Underdeveloped” (“U”) (the lowest possible rating), “Developing” (“D”), “Proficient” (“P”) and “Well Developed” (“WD”) (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>.

Comments 34, 35, 36, 37, 38, 39, 40, 41, 74, 80, 81, 130, 137, 140 attribute the school's performance to more general challenges faced by students and families in the community. It is important to note that decisions around the future of a school in no way reflect on the students who attend the school. The DOE believes that all students, regardless of background, deserve the opportunity to attend a good school. In this situation, the DOE believes the best way to better serve its students and improve outcomes more quickly is to close and replace Richmond Hill. Whenever the decision is made to move forward with a proposal to phase out a school, it is because students deserve a better option. The DOE believes that this proposal will positively, not negatively, impact students. The DOE recognizes that closing a school is a difficult experience for students, staff, and community members.

Comments 10, 28, 30, 54, 56, 130, 131, 137 relate to the demographics of the school community, and assert that minority, ELL, and special education students are being disadvantaged and should be taken into consideration during the evaluation. As stated above, decisions around the future of a school in no way reflect on the students who attend the school. Many of the DOE's metrics, including School Progress Reports, take school demographics into account. As described in the EIS, Richmond Hill currently offers Integrated Co-Teaching ("ICT") classes, Self-Contained ("SC") classes, and Special Education Teacher Support Services ("SETSS"). If this proposal is approved, students with disabilities attending New School will continue to receive mandated services in accordance with their IEPs. Richmond Hill currently offers English as a Second Language ("ESL") services and a transitional bilingual program in Spanish. If this proposal is approved, ELL students at New School will continue to receive mandated services. New School will also continue to offer a transitional bilingual program in Spanish. Students with IEPs or who are ELLs who are currently enrolled in ninth-grade for the first time may apply to a new school for tenth grade through the High School Admissions Process to the same extent as all other current ninth-graders. The DOE believes that this proposal will positively, not negatively, impact all students.

Comment 42 claims that parents misinterpret the school learning environment survey and may confuse the school for the broader community. The Learning Environment Survey asks questions specifically related to the school. While the DOE cannot know whether any particular survey respondents were confused, the DOE believes that survey data provides a valuable insight into how members of the school community perceive safety issues at the school.

Comments 5, 8, 12, 19, 20, 106, 107, 110 (c, d), 115, 116, 117, 118, 119, 151 (c, d, e), 152 (c, d, e) criticize or question the DOE's decision to change the school's federal intervention model from a Restart to Turnaround and express disbelief that the school will receive SIG funding. New York City received \$58,569,883 in funding from SED for 2011-2012 to support implementation of School Improvement Grants in 44 schools (19 Transformation, 14 Restart, and 11 phaseout replacements funded under the Turnaround model). As discussed in more detail in the EISs, outstanding funding for the Turnaround and Restart schools was suspended by the New York State Education Department after the DOE and UFT were unable to reach an agreement on a new teacher evaluation system by January 1, 2012. The DOE is hopeful that this SIG funding will be restored to some of these schools based on the new SIG proposals submitted to SED in March 2012. If the State approves the DOE's application to place New School into the Turnaround model, New School will be eligible for up to \$2M per year as part the School Improvement Grant program. While the Turnaround model does call for the replacement of 50% of the school's staff, federal guidance suggests that some current teachers could count towards the 50% requirement. SED will make the final decision regarding whether to award SIG funding pursuant to the Turnaround model. 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 78 relates to a 2001 lawsuit regarding school funding. That lawsuit focused on the state's obligation to provide funding to local schools, not the city's funding of city schools, or the availability of targeted supplemental funds such as SIG grants.s.

Comments 6, 57, 89, 149, 150 relate to the community engagement and public input during the proposal process. Last Spring, the Department held meetings to begin or continue conversations with PLA schools and their communities about the schools' performance and possible improvement strategies. In January 2012, after taking into account a number of factors, the DOE decided to implement different, more intensive interventions at some PLA schools. At that time, Superintendents and Children First Network staff met with school communities to talk about the DOE's proposal to close and replace the school.

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

Comments 9, 148 assert that the proposal is a result of politics. As stated above, the DOE believes that closing Richmond Hill and replacing it with New School will provide a better educational option to current and future students, which is expected to prompt student improvement more rapidly and with more certainty than previous interventions and supports, which have not led to adequate gains. Thus, this proposal is squarely aimed at improving student achievement. Further, to the extent that this proposal may help secure SIG funding for DOE students, this is an educational aim, not a political one, as these resources are crucial to helping students succeed. However, even if the DOE does not receive SIG funding as a result of this proposal, the DOE believes New School will be better positioned to promote student achievement than is Richmond Hill, in light of Richmond Hill's inability to improve.

Comment 33 relates to the school size, enrollment and overcrowding, and that Richmond Hill has persevered despite these challenges. The EIS sets out Richmond Hill's enrollment and the utilization rate of buildings Q475 and Q944. Schools in buildings with similar utilization rates have generated student outcomes superior to that of Richmond Hill. Thus, the DOE does not believe that the school's size or utilization rate necessarily prevented the school from progressing.

Comments 31 and 32 criticize the Peer Index rating. The overall Progress Report grade is designed to reflect each school's contribution to student achievement, no matter where each child begins his or her journey to career and college readiness. The methods are designed to be demographically neutral so that the final score for each school has as little correlation as possible with incoming student characteristics such as poverty, ethnicity, disabilities, and English learner status. To achieve this, the Progress Report emphasizes year-to-year progress, compares schools mostly to peers which are matched based on incoming student characteristics, and awards additional credit based on exemplary progress with high-needs student groups. Each school's performance is compared to the performance of schools in its peer group, which is comprised of New York City public schools with a student population most like the school's population, according to the peer index. The peer index is used to sort schools on the basis of students' academic and demographic background, and the formula to calculate a school's peer index includes the percentage of students eligible for free lunch, the percentage of students with

disabilities, the percentage of Black/Hispanic students, and the percentage of English Language Learner (“ELL”) students at the school. For high schools, each school has up to 40 peer schools, up to 20 schools with peer index immediately above it and up to 20 with peer index immediately below it. Thus, for accountability purposes, Richmond Hill is grouped in its peer group with other New York City public schools with similar student academic and demographic background.

Comment 75 criticizes the Regents exams since they change. While it is true that standardized assessments may be refined and may change from year to year, the DOE notes that this is not uncommon, and is done in an effort to ensure that metrics are assessing student learning as accurately as possible. Regardless of whether assessments change, the DOE notes that all students take the same test. The DOE believe that the most expeditious way to improve the educational program for the students currently attending Richmond Hill is to close the school and replace it with New School next year. This will allow the DOE to put in place a process to screen and hire the best possible staff for New School, giving all non-graduating students currently attending Richmond Hill access to an improved faculty.

Comment 11 relates to the naming of the school and doubt whether a name will result in an improved school. The impact of the proposal and planning for the proposed new school are outlined in the EIS. While the DOE acknowledges that a name change alone will not drive a larger change in school performance or improve teacher quality, this proposal would not just change the name. Instead, it would close Richmond Hill entirely and replace it with a new school. 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. In any regard, all schools must have unique names, and if this proposal is approved, the new replacement school must have a different name (and school identification number, or DBN) than the closing school. As with all school names, the Chancellor retains final decision-making authority. For more information please refer to Chancellor’s Regulation A-860: <http://schools.nyc.gov/RulesPolicies/ChancellorsRegulations/default.htm>

Comments 13, 77, 91, 92, 94, 98, 110 (d), 114 question the effectiveness of past school closures and past implementations of the 18-D process, and inquire what measures. 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.

Additionally, in regard to measures that will be used to evaluate new schools in addition to progress reports and quality reviews, the DOE will monitor each school's improvement plans and progress in these plans. In regard to 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.

Richmond Hill 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.

Comments 17, 18 relate to seven school closure proposals that the DOE recently withdrew. The DOE may reconsider and withdraw proposals at any time after they are published for community feedback before the scheduled date of the PEP. After re-reviewing the data for those seven schools, the DOE concluded that they have a strong enough foundation to improve with a less intensive intervention, and while we still believe those schools have some work to do to prepare students for success, a more comprehensive review and community feedback revealed that their improvements are sustainable and can lead to a successful school environment without closure and replacement. Each of the seven schools at issue had stronger Progress Report grades than Richmond Hill.

Comments 20, 21, 22, 23, 24, 90, 122, 123, 124, 127, 128, 151 (b, e) relate to the New School hiring process and emotional impact on staff. The guiding principle of this work is to effectively match teacher capacity to the needs of the students in a specific school. The new replacement school will seek to hire only 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.

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

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 Richmond Hill who are not hired at New School will remain in excess. The DOE recognizes that the hiring process may be stressful for those involved in the proposed school closure.

Comment 25 inquires how students will obtain letters of recommendation for college applications. 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.

Comment 48 inquired about the Parent Association, and parent involvement. If approved, 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.

Comment 49, 50, 51, 52 inquires why the proposed new leader was introduced to the school community before the proposal was voted by the PEP, and stated opposition to the proposed new leader. The DOE invited families to attend an event at Richmond Hill to introduce the proposed leader for the New School, in order to provide families with an opportunity to ask questions, and for the proposed leader to listen to what things are going well for student and inform planning for the proposed new school, if the proposal is approved. The meetings did not imply that the proposal had been officially approved.

Comments 55, 105 are related to the impact of the proposal on future students such as siblings of current students and whether rising ninth-grade students can opt out of a turnaround school.

If this proposal is approved, Richmond Hill will no longer enroll future incoming classes.

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

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

In addition, all students in non-terminal grades who currently attend Title 1 Schools in Need of Improvement ("SINI") Year 2 status or worse (including PLA schools), such as School XYZ, are also eligible to apply for a transfer to another non-SINI school through the DOE's existing No Child Left Behind ("NCLB") Public School Choice Process. More information about this process can be found at the DOE's Web site at: <http://schools.nyc.gov/choicesenrollment/changingschools/default>.

Comment 57 indicates that community members may be afraid to state their opinions related to the proposal. The DOE works to make the process for proposals and community engagement transparent and fair, and abides by the process laid out in State Education Law Section 2590-b, as detailed in Chancellor's Regulation A-190. However, if community members feel that they cannot share their opinions publicly, they may use the email or voicemail listed above to share their feedback anonymously.

Comment 58, 93, 96 inquire about supports provided to the school. The existing schools will continue to be supported by their networks through the end of the school year. The students will also be supported through the efforts of the Office of Student Enrollment to ensure that students have a guaranteed seat in the new school and receive a clear understanding of their enrollment options. Replacement schools are being supported through several coordinated measures. Proposed principals for the replacement schools began working with the Division of Portfolio Planning, in February and March, as part of the Turnaround Principal Institute. In this intensive workshop, principals have been supported in planning for their schools along a wide spectrum, including such elements as mission-creation, curriculum planning, scheduling, and hiring, among other topics. Proposed leaders also continue to be supported by their Children First Network in this work. Finally, pending the availability of School Improvement Grant funding, Educational Partner Organizations ("EPOs"), which worked with schools previously implementing the Restart model, will continue to partner with replacement schools. If these proposals are approved, during the 2012-2013 school year and beyond, as they implement the plans being made this spring and summer, new schools will be supported by their networks, the Division of Portfolio Planning, and, where relevant, their EPOs.

Comment 59 voiced support for the proposal.

Comments 61, 97 inquire- about summer school and what will be printed on the graduation certificate. at this time, the DOE is investigating whether the Richmond Hill 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 votes on the proposal. Each year, a number of school buildings host summer school programs. Individual schools choose to affiliate to a particular building for summer school opportunities for their students, which may mean offering their own programs for their students, offering a summer school program in partnership with other schools.

Of the buildings that will be open to host summer school in 2012, some have schools which have been proposed for closure and replacement, though many do not. Regardless, all students currently attending a school proposed for closure and replacement will have the opportunity to attend summer school, either in their home building or in the one with which their school has affiliated. Students are typically assigned to summer school during June, and this same process will be in place this year for students in all schools, whether they attend one proposed for closure or not. For more information about summer school, please see the DOE's Web site at: <http://schools.nyc.gov/ChoicesEnrollment/SummerSchool/default.htm>.

Comments 62, 63, 64, 95, 123, 124, 151 (b) relate to the new school planning, hiring of administration and deans, and timeline for implementation. If this proposal is approved, the school will then begin the 18-D process. The exact timeline will vary for each school, depending on the availability of hiring committee members, the number of applications received, and the number of positions to be filled. The new school, with its planned new elements and staff (made up of returning teachers and teachers new to the school), would open in September 2012 and would serve all students currently in the school who have not graduated by that time, as well as any new students who would have otherwise begun attending the closed school.

Each school has unique elements in its new school plan, many of which will be implemented at the start of the 2012-2013 school year. However, some schools have plans to phase in the new elements more gradually. For more information about the specific plans of the new school, please see the EIS.

Comment 70 asserts that school closure may lead to a lawsuit. The DOE believes that the proposal is consistent with all applicable laws, rules, and regulations.

Comments 71, 72 state that the current staff do not reflect the diversity of the community and the school does not translate documents into Hindi. Given that New School will be hiring staff, it is possible that New School will hire more staff that are more diverse than the current staff, though it is difficult to predict the exact demographic composition of staff at the New School. Decisions related to translations and interpretations at the school level are handled by school leaders. The DOE also offers over-the-phone interpretation services that staff may use on-site.

Comments 73, 101, 102, 103 are related to the JIT review for the school. 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.

Comment 79 states that trailers have been at the school for a number of years. The EIS identifies a transportable classroom unit (TCU), Q944 that is occupied by Richmond Hill. New School will also utilize the TCU. The DOE believes closing Richmond Hill and replacing it with a new school 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 – regardless of the existence of a TCU.

Comment 88 inquires whether there will be delays in the implementation of the Common Core Learning Standards 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 99, 121, 126 inquire 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.

Increasing the quality of teaching through the creation of new schools has been shown to be an effective improvement strategy for New York City. In fact, in June 2010 MDRC, an independent research group, issued a report on New York City's new schools strategy. MDRC concluded: "it is possible, in a relatively short span of time, to replace a large number of underperforming public high schools in a poor urban community and, in the process, achieve significant gains in students' academic achievement and attainment. And those gains are seen among a large and diverse group of students — including students who entered the ninth grade far below grade level and male students of color, for whom such gains have been stubbornly elusive." (MDRC, "Transforming the High School Experience," June 2010.)

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

Comment 100 inquires who makes up the planning team for the New School. 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.

Comment 104 inquires 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 108 asks about funding for restart schools. The DOE is currently working with six Educational Partnership Organizations (EPOs) 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 109 asks about former Restart schools maintaining relationships with EPOs. 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 147 expresses concern about the money spent on uniforms for the new school and the cost to purchase uniforms for the new school.

While the DOE acknowledges that a school may choose to update its uniforms based on the new school name, a school could choose to keep the same uniforms since the name of the building and campus will not be changing. In shared campus situations, schools have historically represented their campus under the same name.

Comment 153 contends that the DOE advised CECs not to offer comment at joint public hearings.

One comment 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 154 concerns the petition received by the DOE that opposes the proposals to close and replace schools.

As stated earlier, the DOE has provided several supports to the schools in question, but believes only their closure and replacement will accelerate the pace of change needed to achieve the desired improvement for current students in these schools.

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

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

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

Changes Made to the Proposal

No changes have been made to this proposal.