



Dennis M. Walcott
Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of Long Island City High School (30Q450) and the Opening and Co-Location of New School (30Q365) with a District 75 Inclusion Program (75Q993) in Building Q452 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 Long Island City High School (30Q450, “Long Island City”), an existing district high school in building Q452, located at 14-30 Broadway, Queens, NY 11106, within the geographical confines of Community School District 30. It currently serves students in grades nine through twelve. The DOE is proposing to immediately replace Long Island City with New School (30Q365, “New School”), a new district high school which will serve students in grades nine through twelve in building Q452.

If this proposal is approved, Long Island City 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 and automatically enrolled in New School.

Long Island City is co-located with a site of Public School 993, a District 75 multi-sited school serving students at multiple locations within general education schools in the borough of Queens. The site at building Q452, P.S. Q993@LIC (75Q993, “Q993@LIC”), currently serves students in grades nine through twelve and serves students who require a 12:1:1 self-contained instructional setting. Students are admitted to Q993@LIC through the District 75 placement process, which is described in more detail in Section III of this proposal. If this proposal is approved, Q993@LIC will continue to exist after Long Island City closes and will continue to be provided in Q452. In addition, Q452 houses a Living for the Young Family Through Education (“LYFE”) program. If this proposal is approved, New School will be co-located with Q993@LIC beginning in the 2012-2013 school year. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias.

Long Island City offers one Career and Technical Education (“CTE”) program. It admits students through the Citywide High School Admissions Process through screened and zoned methods.

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 Long Island City and replacing it with New School, the DOE is seeking to expeditiously improve educational quality in the Q452 building. If this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen

prospective staff – including Long Island City 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 the quality of teaching and learning in the school, DOE will maximize New School’s chance of receiving up to \$1,550,000 in supplemental federal funding under the federal School Improvement Grant (“SIG”) program. New School will build on the strongest elements of Long Island City and incorporate new elements, including new talent better able to meet student needs. Thus, the immediate closure and replacement of Long Island City 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 offices of Long Island City and 75Q993.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at Q452 on April 17, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 479 members of the public attended the hearing, and 58 people spoke. Present at the meeting were the Chancellor’s Designee, Deputy Chancellor Shael Suransky; Community Education Council (“CEC”) 30 representatives Ernest Brooks, Isaac Carmignani, Devika Seeraj, and Maritza Herrera; and Long Island City School Leadership Team (“SLT”) representatives Ken Achiron, Nicholas Lungbugenski, Tracey Brown, Nicole Lucin, Anita O’Brien, Amira Sharif, and Bryan Mercado. New York City Council Member Peter Vallone, New York City Council Member Jimmy Van Bramer, Queens Borough President representative Dmytro Federowsky, a representative of New York State Senator Michael N. Gianaris, a representative of New York State Assembly Member Aravella Simotas, and a representative of New York State Assembly Member Catherine Nolan also attended the hearing.

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

1. A representative of the Long Island City SLT opposed the proposal for the following reasons:
 - a. Neither the Chancellor nor the Mayor has visited the school despite repeated invitations.
 - b. Long Island City is a large comprehensive high school that is able to offer a wide variety of classes and programs because of its large enrollment, and a smaller replacement school would not be able to present the same set of programs and classes, particularly Advanced Placement courses, as Long Island City would. Specifically, Long Island City was recently listed in *Newsweek*’s Top 1,600 high schools in America because of the Advanced Placement courses that it offers.
 - c. Long Island City is a zoned school, and it accepts all students, including students who have recently immigrated to the United States. Thus, Long Island City’s staff must contend with students who have more challenging needs than other high schools. Because these students often require more than four years to graduate Long Island City’s four-year graduation rate is unfairly lowered.

- d. Long Island City has been destabilized by recent turnover in school leadership that resulted in four principals in two years.
- e. Former SED Commissioner of Education David Steiner commended Long Island City for its progress and recognition by *Newsweek*.
- f. Long Island City teachers have formed supportive relationships with students, and the proposal would disrupt these relationships. This would particularly affect current eleventh grade students.
- g. The proposal would disrupt Long Island City's extensive network of alumni and relationships within the community.
- h. The DOE has not supported Long Island City since it entered PLA status. For example, Long Island City should have received \$2 million instead of \$1.8 million of its Transformation grant. Also, when Long Island City had to revise students' schedules in Fall 2011 because Long Island City had more than 28 teacher vacancies at the start of the 2011-2012 school year, neither the DOE, the Queens high school superintendent, nor Long Island City's Children's First Network provided Long Island City assistance.
- i. The proposed principal of New School has praised Long Island City's staff, so there is no reason to close Long Island City and replace half of its staff.
- j. Long Island City's current experienced teachers would be replaced by inexperienced teachers who would lack the context and knowledge to serve Long Island City's students.
- k. Just as Long Island City was withdrawn from the Transformation model before the model was completed, New School will also be withdrawn from the Turnaround model, and it will be similarly disruptive.
- l. There is no evidence that New School will be more successful than Long Island City because New School will still serve the same student population that Long Island City currently serves.
- m. Long Island City's staff serves the school's special education students well, and the proposal would disrupt the services that they provide.
- n. Long Island City's staff is dedicated to serving students with interrupted formal education and other English Language Learner students, and New School cannot guarantee that its staff will be similarly dedicated and able to serve these students. For example, 30 of Long Island City's 90 students with interrupted formal education were able to transition to general education this year, but Long Island City does not receive credit for this type of student progress. Long Island City has a Title 7 grant that provides Saturday enrichment and tutoring to students with interrupted formal education and their families.
- o. There is no guarantee that New School will be able to continue Long Island City's unique programs, such as its Spanish theatre program that promotes literacy amongst English Language Learner students, the culinary arts program, the Credit Recovery program, the Global Kids, the Robotics team, the Junior Reserve Officer Training Corps, the PASS program that provides targeted remediation for at-risk students, the school's band, the school's choir, the school's various successful athletic programs, and Gear-Up with St. Johns University.
- p. Replacing Long Island City's staff would endanger the institutional knowledge that Long Island City's teachers have in terms of accessing scholarships for students.
- q. Long Island City's graduation rate has risen, and it is unfair that Long Island City be withdrawn from the Transformation model and proposed for closure before it could complete its three-year term and be removed from PLA status.
- r. Closing Long Island City and changing its name would jeopardize students' access to the scholarship that is committed to graduates specifically of "Long Island City High

School.” Students of a replacement school, which would have a different name, may not be eligible for this scholarship.

s. Long Island City integrates its other subjects with its physical education curriculum.

t. Unlike other high schools, Long Island City reports every safety incident, which has led to a decrease in the school’s School Environment sub-grade in the Progress Report. The school has not been supported with sufficient School Safety Agents. Long Island City should not be closed because there are other high school campuses with more serious safety issues.

u. Has the decision to close Long Island City already been made by the DOE because a leader for New School has already been chosen?

2. Representatives of the CEC opposed the proposal for the following reasons:

a. Long Island City had a higher graduation rate in 2010-2011 than the Citywide average.

b. The current list of high schools proposed for closure disproportionately targets English Language Learner and special education students.

c. Closing large high schools would reduce the programs available to students because large high schools have a sufficient number of students to provide funding for diverse programs, such as Advanced Placement courses.

d. Long Island City has an extensive network of alumni and relationships within the community.

e. Students who have graduated from Long Island City have been successful because the staff is supportive.

f. Long Island City’s successes are defined beyond its statistics because its successful programs, sports teams, and clubs are not captured by statistics.

3. Representatives of the CEC opposed the proposal because Long Island City must serve students of all levels and backgrounds, particularly challenging backgrounds, because it cannot screen students.

4. A representative of the CEC asked:

a. Why is Long Island City closing?

b. Why replace Long Island City’s experienced teachers with inexperienced teachers?

c. Why can’t Long Island City remain in the Transformation model?

5. Representatives of the SLT opposed the proposal for the following reasons:

a. Closing Long Island City would jeopardize its successful programs, such as its gymnastics team and its performing arts program.

b. Long Island City students have formed close bonds with teachers, and closing Long Island City would disrupt those bonds.

c. Long Island City’s graduation rates have improved over the past two years.

d. There is no guarantee that the Turnaround model will be successful.

e. Neither the Mayor nor the Chancellor has visited Long Island City, so they cannot judge if the school is successful.

f. Long Island City’s successes are defined beyond its statistics because its successful programs, sports teams, and clubs are not captured by statistics.

g. Closing Long Island City would mean abandoning the school’s history within the community.

h. Long Island City is a school that serves the neighborhood by providing a wide variety of elective programs, Advanced Placement courses, clubs, and sports teams.

i. Long Island City teachers have formed supportive relationships with students, and the proposal would disrupt these relationships.

6. Council Member Vallone opposed the proposal because closing Long Island City would jeopardize the school’s culinary arts and athletic programs.

7. The Queens Borough President's representative opposed the proposal for the following reasons:
 - a. Long Island City was improving under the Transformation model and should remain in that model.
 - b. The Turnaround model is not guaranteed to improve the educational experience for students, and it cannot provide sustainable and long-term gains for students.
8. A representative of the UFT opposed the proposal for the following reasons:
 - a. Though Long Island City was placed in the Transformation model and promised additional funds, the school's budget was reduced.
 - b. Long Island City's graduation rates have improved.
 - c. Long Island City's graduation rate in 2010-2011 was higher than over 200 other high schools throughout the City.
9. A representative of State Senator Gianaris stated that State Senator Gianaris opposed the proposal because firing over half of Long Island City's teachers would negatively affect Long Island City's current students.
10. A representative of Assembly Member Simotas stated that Assembly Member Simotas opposed the proposal for the following reasons:
 - a. Long Island City students have formed close bonds with teachers, and closing Long Island City would disrupt those bonds.
 - b. Closing large high schools would reduce the programs available to students because large high schools have a sufficient number of students to provide funding for diverse programs, such as Advanced Placement courses.
 - c. Long Island City has made progress under the Transformation model, and it should remain in that model.
 - d. No schools from Queens were removed from the school closure list.
11. A representative of Assembly Member Nolan stated that Assembly Member Nolan opposed the proposal for the following reasons:
 - a. The proposed closure of Long Island City has damaged the school's reputation and deterred parents from sending students to Long Island City, which would further damage the school because it would lead to a smaller school budget.
 - b. Long Island City has not had sufficient time under the Transformation model to see the full effects of the changes it implemented under that model.
 - c. The proposed closure of thirty-three schools and opening of thirty-three new replacement schools pose a strain on personnel and resources that would cause structural and organizational problems for the DOE.
12. Council Member Van Bramer opposed the proposal for the following reasons:
 - a. It is unclear how closing Long Island City would benefit current and future students.
 - b. Closing Long Island City would disrupt students' relationships with teachers and create instability for students.
 - c. The new school would not be able to provide the same programs and courses that Long Island City currently does.
13. Multiple commenters opposed the proposal because there is no guarantee that New School will be able to offer a similarly diverse set of programs and courses to students.
14. Multiple commenters opposed the proposal and stated that closing Long Island City and releasing 50% of Long Island City's staff into Absent Teacher Reserve would disrupt Long Island City's progress under the current Transformation model.
15. Multiple commenters opposed the proposal and stated that Long Island City should be allowed to continue to implement improvements under the Transformation model.
16. A commenter stated that the proposal is politically motivated and not intended to benefit students.

17. Multiple commenters opposed the proposal and stated that, contrary to the DOE's claims, Long Island City has successfully prepared students for college and careers.
18. Multiple commenters stated that Long Island City's student demographics should be considered when analyzing Long Island City's academic performance because it should be evaluated by a different standard than other New York City schools.
19. Multiple commenters contended that closing Long Island City would eliminate the benefits the school receives from its extensive network of alumni and relationships within the community.
20. Multiple commenters contended that the proposal would be detrimental to students because it would disrupt their educational experience and existing relationships with supportive teachers.
21. Multiple commenters contended that closing Long Island City would endanger Long Island City's successful academic programs, such as its law and culinary arts programs.
22. A commenter contended that Long Island City should not be closed because it has been negatively affected by recent budget cuts, which would have impaired the school's progress.
23. Multiple commenters contended that Long Island City should not be closed because the students, the teachers, and members of the community have expressed their opposition to the proposal.
24. Multiple commenters contended that Long Island City should not be closed because the school was not properly supported by the DOE.
25. Multiple commenters contended that Long Island City should not be closed specifically because its graduation rates have recently improved.
26. Multiple commenters contended that closing Long Island City would endanger Long Island City's successful athletic programs, such as its gymnastics, soccer, and lacrosse teams.
27. A representative of the Council of School Supervisors & Administrators ("CSA") stated the CSA opposed the proposal for the following reasons:
 - a. New staff would be hired at New School, but the qualifications have not yet been stated.
 - b. The potential loss of half of Long Island City's staff would be disruptive to students.
 - c. If all of the proposals to close and immediately replace schools throughout the City are implemented, almost 1,800 teachers would be placed in the Absent Teacher Reserve ("ATR"), which would impose a cost of nearly \$180 million on the City. These are funds that should instead be used to support schools throughout the City.
28. Multiple commenters stated that Long Island City is a valuable option for students who lack other high school options because it is a zoned school.
29. A commenter stated that there is no evidence that the Turnaround model is more effective than the Restart or Transformation model.

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

The DOE received twenty-two written comment and two oral comments through the dedicated Web site and phone line for this proposal.

30. A commenter contended that closing Long Island City would endanger Long Island City's successful athletic programs, such as its gymnastics, soccer, and lacrosse teams.
31. Multiple commenters contended that Long Island City should not be closed and replaced by a small high school because it is able to offer a wide variety of programs and courses because it is a large high school.
32. A commenter stated that it is unfair that Long Island City, which is a zoned school, is compared to schools in its peer group that are able to screen their students.

33. A commenter stated that implementing all of the school closure and immediate replacement proposals would impose a significant strain on the City's financial resources.
34. Multiple commenters contended that Long Island City should not be closed because its graduation rate has been increasing.
35. A commenter stated that Long Island City should be closed because its instruction has not been good and the school needs to improve its safety.
36. A commenter opposed the proposal and stated that it is politically motivated.
37. Assembly Member Catherine Nolan submitted a letter stating her opposition to the proposal for the following reasons:
- a. Long Island City has not had sufficient time under the Transformation model to see the full effects of the changes it implemented under that model.
 - b. The proposed closure of Long Island City has damaged the school's reputation and deterred parents from sending students to Long Island City, which would further damage the school because it would lead to a smaller school budget.
 - c. The proposed closure of thirty-three schools and opening of thirty-three new replacement schools pose a strain on personnel and resources that would cause structural and organizational problems for the DOE.
38. State Senator Michael Gianaris submitted a letter stating his opposition to the proposal because closing Long Island City and firing 50% of Long Island City's staff would disrupt Long Island City students' educational experience.
39. A commenter opposed the proposal because the Progress Report does not take into account Long Island City's student demographics, such as the number and percentage of English as a Second Language and recent immigrant students, or the variations of a school's neighborhood because schools in one neighborhood are compared against schools in another.
40. A commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
41. A 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.
42. A commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
43. A commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
44. A 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.
45. A commenter asked about the supports that are offered to schools that implement school closure and replacement.
46. A commenter asked about the measures that 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., the Transformation and Restart models).
47. A commenter asked about the timeline for the implementation of the Turnaround model.
48. A commenter asked about the supports that networks and other entities have provided to the schools that are in PLA/School In Need of Improvement status or have declining Progress Report grades.
49. A 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.
50. A commenter asked about the impact of the new schools and implementing the closure/replacement approach.

51. A commenter asked about who makes up the planning team for each school.
52. A commenter asked if the state mandates a Joint Intervention Team (“JIT”) review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
53. A commenter asked if a JIT review was done for each of the 25 high schools on the turnaround list before the earlier intervention model (i.e., Transformation or Restart) was selected and before the Turnaround model was selected.
54. A commenter asked if the JIT reports are available to the public.
55. A commenter asked if the proposed new school will receive over-the-counter, English Language Learner, and over-age under-credited students.
56. A commenter asked about the \$58 million designated to New York City schools as SIG funding and whether this figure represented what was suspended as of January 3, 2012, or does it date back further.
57. A commenter asked about whether a school that enters the Turnaround model would automatically get funding or would there be a competitive process that takes place afterwards. The commenter also asked about how much funding each school would receive.
58. A commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.
59. A commenter asked if rising ninth-grade students can opt out of a Turnaround school.
60. A commenter contends that the DOE advised CECs not to offer comment at joint public hearings.
61. 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.
62. Multiple commenters submitted a letter via email to express opposition to the proposal and cited concerns related to the sports and extracurricular activities offered at Long Island City, and expressed the need for teacher evaluation systems.
63. Multiple commenters submitted emails opposing the proposal and supporting the positive benefits of Long Island City.

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

Comments 1k-1, 4a-c, 5d, 7a-b, 8a, 10c, 11b, 15, 29, and 37a, 61a, 62 generally oppose the proposal and state the desire to keep the school in the Transformation model and ask why the school is now being proposed for Turnaround. The comments question whether improvements can be made under the Turnaround model.

The New York State Education Department (“SED”) identifies a school as Persistently Lowest Achieving (“PLA”) either based on graduation rate of less than 60% for three consecutive years and/or failure to meet performance index targets. SED identified 54 schools in New York City as PLA as of December 9, 2010. In May 2011, following the review of the 54 schools designated as PLA during the 2010-2011 school year, the DOE assigned 44 of the schools to one of the four federally-approved intervention models and submitted SIG applications to SED where appropriate. PLA schools that demonstrated the potential to improve with the supports provided for within the Transformation and

Restart models were selected to begin implementation of one of those models in school year 2011-2012. Following SED's review and approval, 19 schools were assigned to the Transformation model and 14 schools were assigned to the Restart model. Eleven schools which the DOE concluded were not able to quickly improve student performance were assigned to implement the phase in/phase out version of the Turnaround model, where one or more new schools replace the PLA school over a number of years, while the PLA school stops accepting students and phases out gradually. In the remaining ten schools, the DOE wanted to collect additional information to determine the most appropriate intervention, and thus these schools were not assigned a SIG model. Instead, the DOE provided \$300,000 in Title I funding to each of those schools to support them in beginning some initial improvement work and planning for more intensive intervention in subsequent years.

Long Island City was first designated as PLA during the 2009-2010 school year and again in the 2010-2011 school year. That decision was predicated on the school's moderate performance in 2008-2009, followed by a decline in 2009-2010 on several progress metrics. The DOE determined that the Transformation model, a relatively less intensive intervention, had the potential to reverse the downward trend and was therefore the best fit for the school. The school was one of the 19 schools the DOE applied to place into the Transformation model. SED approved the application, which made Long Island City eligible for up to \$1,550,000 in SIG funding per year for three school years. However, Long Island City's continuing eligibility for these funds under the Transformation model was conditioned upon the DOE and UFT agreeing to implement a new teacher evaluation system by January 1, 2012. Unlike the Turnaround model, the Transformation and Restart models require the implementation of a comprehensive teacher evaluation system based on multiple measures. This teacher evaluation requirement is intended to enable schools to improve student achievement through a more robust and rigorous teacher evaluation process, which in turn would result in more targeted support for struggling teachers and greater accountability for ineffective teachers by allowing for their expedited removal when they are not serving students well.

The DOE was unable to reach an agreement with the UFT by the January 1, 2012 deadline on integral elements of this new teacher evaluation system. Because of this, SED informed the DOE that all New York City PLA schools in either the Transformation or Restart models would no longer receive SIG funding to continue the school reforms supported by these models.

After SED informed the DOE that the Transformation and Restart models were no longer available to New York City schools and that funding had been suspended, the DOE began to look at alternative approaches it could take to ensure that the supports and funding started under the Transformation and Restart models could continue and be strengthened. Furthermore, the continuing lack of a new teacher evaluation system led the DOE to further evaluate other options that were available to improve teacher quality.

Long Island City's most recent Progress Report was released at the end of October 2011, after the DOE's initial decision to implement the Transformation model at the school. However, as evidenced by the 2010-2011 Progress Report, Long Island City's progress and performance metrics remained largely flat. Based on this most recent data, and feedback from members of the New York State Board of Regents that the pace of change in some Transformation and Restart schools was not quick enough to meet the challenges they faced, the DOE believes that students at Long Island City would be better served by implementation of a more intensive intervention. Even if the DOE and UFT do reach an agreement on evaluations, it will likely take at least two more years for poor performing teachers to be removed from the classroom. Given the inadequate pace of progress discussed above, the DOE has concluded it cannot wait that long to implement the staff changes necessary to improve student outcomes.

Thus, the DOE decided to propose that Long Island City be closed and replaced with a new school that would incorporate the strongest elements of Long Island City, while also allowing new staff to be put in place who can accelerate the improvement in student outcomes.

Comments 1a, 5e, 1q, 2a, 5b-c, 8b, 8c, 25, 34, and 61a disagree with the idea that the school was not improving, asserting that the school has made progress, particularly in the graduation rate, and state that the Mayor and the Chancellor have not visited the school in person and therefore would not be able to determine the school's success. Regardless of whether the Mayor or the Chancellor have visited the school, the fact remains that the New York State Education Department has identified Long Island City High School as a PLA 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.

The EIS acknowledges that Long Island City has made some progress in some areas. In particular, the EIS states:

- The four year graduation rate at Long Island City has shown some increase in the past few years, rising from 57% in 2007-2008 to 66% in 2010-2011. Additionally, the school has been able to graduate an increasing number of students in six years. The 2010-2011 six year graduation rate was 68%, notably higher than the 2007-2008 six year graduation rate of 58%. The DOE believes that with new programs and a push to improve teacher quality, New School could expand this recent improvement in overall student outcomes.
- Long Island City appears to be having some success in graduating students with disabilities in self-contained ("SC") classrooms. 24% of SC students graduated in four years, in the top 40% Citywide for self-contained students. The DOE will seek to preserve Long Island City's efforts to support these students in New School, while implementing new supports to assist other student populations who continue to struggle at Long Island City, including students with disabilities in Special Education Teacher Support Services ("SETSS") programs.
- While overall third year credit accumulation at Long Island City is in the bottom 33% Citywide, students' Regents exam outcomes in some subjects, such as US History, indicate some success in specific subjects. The DOE will seek to preserve the success of Long Island City's instructional programs in those areas in New School, while also implementing new programs to improve instruction in other subjects.
- The school's overall Quality Review score was rated as "Proficient," (P) citing specific areas of strength such as that both students and families welcome high expectations consistently conveyed by school leaders, and that a broad curriculum exists offering specialized courses and a variety of electives. With the new supports and restructuring, 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. Long Island City earned an overall C grade on its 2010-2011 annual Progress Report, with a C grade on Student Progress, a C 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 80.8%, putting Long Island City in the bottom 18% 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 66% of students reported feeling safe in the hallways, bathrooms, and locker rooms. This response is in the bottom 7% of high schools Citywide. In addition, only 65% of teachers reported that discipline and order were maintained at the school.
- Long Island City was rated "Proficient" on its most recent Quality Review in 2010-2011. Quality Reviews evaluate how well schools are organized to support student learning. Long Island City's 2010-2011 Quality Review cited a number of concerns, including the need for a yearlong professional development plan aligned to school-wide goals, the need for enhanced differentiated approaches to learning, and the need to ensure consistent improvement of instructional practice through explicit feedback to teachers.

As stated in the EIS, Long Island City has struggled to improve, and its performance during the last few years confirms the DOE's assessment that the school continues to require significant intervention to improve student outcomes. The new structural and programmatic elements that are part of this proposal, and the ability to quickly screen and hire staff who are able to implement those enhancements, will allow the DOE to address the core problems that have led to the poor performance highlighted above.

Comments 1b, 1e-g, 1o-p, lr, ls, 2c-f, 5a-b, 5f-i, 6, 10a-b, 11a, 12a-c, 13, 17, 19, 20, 21, 26, 30, 31, and 37b, 61 b, 62, 63 focus on positive aspects of students' experiences at the school, including relationships with their teachers, connections with the community and alumni network, the variety of academic and extracurricular programs that are available at a large comprehensive high school, and the school's history in the community and content that the proposal harms students. The comments reflect concern about the impact of the Turnaround plan on these features and the ability to provide similar offerings at a smaller new school.

The EIS identifies several areas of success at Long Island City, and the DOE recognizes that many members of the community value the school's history. However, the EIS also demonstrates that Long Island City is failing students according to a number of performance metrics. Contrary to suggestions that a small school will replace Long Island City, the new school that will open once Long Island City closes will continue to be a large school with approximately 3,265-3,305 students, roughly the same size as the current school.

As stated in the EIS, instructional elements that have engaged and given students an enriching learning experience, such as Advanced Placement courses and the culinary arts program, will be continued at the New School. New School is also expected to offer the same extracurriculars, clubs, and student athletics as Long Island City offers. At the same time, while acknowledging these strengths and the many students who spoke positively about their experiences in the school, the attendance rate of 80.8% in 2010-2011 along with a C rating in both Student Performance

¹ 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 website at: <http://schools.nyc.gov/Accountability/tools/review>.

and Student Progress on the Progress Report indicates that a large number of students are not having this same positive experience.

With regard to comments regarding the school's connections with the community and alumni network, including the comment citing the change in school name as making students ineligible for scholarships specifically targeting graduates of Long Island City, the DOE recognizes the legacy of the school and its long-standing history and relationship with its community and alumni network. If the New School is approved to open, the DOE anticipates that these strong advocates for Long Island City will continue to support the student body..

Comments 1c, 3, 1n, 18, 28, and 32 state that as a zoned school, Long Island City serves varying levels of need, including those who recently immigrated to the United States, which unfairly impact the school's four-year graduation rate. Comments 18 and 32 state that the school should be evaluated under a different standard due to its student demographic or use a comparable peer group that does not screen its students.

The DOE reviews a broad range of metrics to fully evaluate school performance, including four- and six-year graduation rates, graduation rates for ELLs and students with special needs, credit accumulation, attendance, Quality Reviews, and other information, then compares that data to other schools serving similar populations of students. Thus the focus is on ensuring student progress, not merely comparing the performance of ELLs to native English speakers. Additionally, 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, Long Island City is grouped in its peer group with other New York City public schools with similar student academic and demographic background. For example, the High School for Law Enforcement and Public Safety (28Q690) received an A on its most recent Progress Report, and has a 78.5% four-year graduation rate and a 85.5% six-year graduation rate.

Comment 1d contends that the school has been destabilized due to leadership turnover in the past two years. The DOE makes an ongoing assessment regarding the school leadership and administration and makes decisions that it believes will best lead a school and its teachers and students to success. While the DOE acknowledges that leadership changes can be difficult for a school community, the DOE does not make these decisions lightly. Multiple leadership decisions, although challenging in of itself, do not mean that closure and replacement is not the best intervention for Long Island City. For reasons stated throughout the EIS and in this analysis of public comment, the DOE believes that by closing this school and replacing it with a new school, the DOE is seeking to quickly create a high-quality school environment that children need to prepare for success in college, work, and life.

Comments 1h, 24, and 48 ask about supports provided from the DOE to the school prior to the proposed plan for Turnaround.

As stated in the EIS, for the past several years, the DOE has sought to support Long Island City in order to ensure that it was equipped to provide a quality education for its students.

Leadership Support:

- Provided leadership training for the principal and assistant principals to help them set clear goals for the school while developing the school’s Comprehensive Education Plan and Language Allocation Plan.
- Provided leadership training, coaching, and mentoring for the school’s principals to help them design plans to improve instruction and develop teachers.
- Supported leadership and staff in generating meaningful strategies for improving the quality of classroom visitations and instructional feedback, as a way to improve teacher practice and improve student outcomes.

Instructional Support:

- Trained leadership on implementing plans in support of citywide instructional initiatives, including implementing Common Core Learning Standards.
- Supported the school in assessment design, curriculum mapping, and student feedback as tools aimed at meeting the necessary standards and expected student outcomes.

Operational Support:

- Advised school staff on budgeting, human resources, teacher recruitment, and building management.
- Supported school staff on developing strategies and practices for improving student attendance and creating strategies for targeting attendance concerns.
- Supported school staff in Special Education compliance issues, including timely writing of Individualized Education Programs (“IEPs”), alternative assessments and other supports and strategies for improving instruction, and plans for students with disabilities.
- Provided specialized support for English Language Learners (“ELLs”) and ensure they meet graduation standards.
- Provided support to increase technology as an instructional tool.

Student Support:

- Provided supports to review disciplinary and procedural protocols targeted at improving the school learning environment and impacting student outcomes.
- Facilitated the development of meaningful and rich relationships with various community organizations, including Gear Up and Global Kids, in order to connect students with mentoring opportunities to prepare them for success in college and careers.

Even with these supports, however, the DOE has determined that Long Island City does not have the capacity to quickly improve student achievement. Rather, the DOE believes that the most expeditious way to improve the educational program for the students currently attending Long Island City is to close the school and replace it with New School next year. This will allow the DOE to put a process in

place to screen and hire the best possible staff for New School, giving all non-graduating students currently attending Long Island City access to an improved faculty.

Comment 1h states that Long Island City should have received \$2 million in SIG funding instead of 1.8 million, and that the school did not receive support from the DOE during fall 2011 when it had to revise student scheduling due to high vacancies. As stated in the EIS, \$2,000,000 represents the maximum annual State award for any one PLA school. Actual allocations are calculated on a per-pupil basis based on a weighted Fair Student Funding (“FSF”) formula. Current allocations for New York City schools implementing a SIG model range from \$800,000-\$1,800,000 per year. In regard to the scheduling and programming challenges, actions were quickly put into place to rectify the issue and the matter was resolved. The school’s Network leader and Network Director of Operations met with principal on several occasions during the summer to plan for school opening and provided recommendations for programming. After programming issue became known, the Achievement coach, network leader and a program chair from another network school spent 19 consecutive days (including weekends) reprogramming school. Additionally, the Network budget team and Network leader have visited the school to review use of per diem subs and to restructure teaching staff, and the Network assisted the school to create and implement elective courses for Fall semester, before/after school and Saturday, to enable students to earn course credit. As described in the EIS, the DOE provides all schools with Leadership, Instructional, Operational and Student Supports which covers a range of areas which include programming and scheduling.

Comments 1i, 1j, 1m-n, 4b, 9, 14, 27a-b, 38, 42, 43, and 44 state concerns that replacing half of the current staff will be disruptive to students and will replace experienced teachers with new teachers who may not be as practiced or aware of supporting the needs of the students from Long Island City. Comment 27a states that qualifications for the new school staff are not yet available. Comment 42 suggests these plans will result in teachers moving between PLA schools. The guiding principle of this work is to effectively match teacher capacity to the needs of the students in a specific school. The new replacement schools will seek to hire those teachers they believe will be effective and well-matched to their new missions. There is no quota of staff that must be removed as a result of this process. This proposal does not require the turnover of any set percentage of staff.

The schools will accomplish this through the staffing process set forth in Article 18-D of the DOE’s existing contract with the UFT, which will allow a Personnel Committee to determine the best staff for the new school. The Personnel Committee consists of, at minimum, five representatives: the school principal, two designees of the UFT President, and two designees of the Chancellor. The school-based Personnel Committee will evaluate applicants’ qualifications. The Personnel Committee should strive to seek consensus in its hiring decisions; however, if consensus cannot be reached, decisions are made by majority vote.

In this way, the DOE believes that only those teachers who will be most effective will be hired by the new schools. As stated in the EIS, current teachers from Long Island City High School who are not hired at New School will remain in excess.

Barring system-wide layoffs, excess teachers will be eligible to apply for other City positions, and any teachers who do not find a permanent position will be placed in the Absent Teacher Reserve (“ATR”) pool, meaning that they will continue to earn their salary while serving as substitute teachers in other

City schools. This will not count as a cost or savings to New School, but could increase overall ATR costs to the DOE.

As mentioned, this proposal to close and replace Long Island City does not require the turnover of any set percentage of staff at Long Island City. If this proposal is approved, New School will go through a process to hire the best possible staff. Pursuant to the City's contract with the UFT, teachers who apply to work at New School will be reviewed by a school-based Personnel Committee through the 18-D process. New School will be able to retain Long Island City's current teachers who meet the rigorous, school-specific competencies established by the Personnel Committee, and the DOE will encourage the most effective teachers at Long Island City to join New School to anchor the school with their commitment to effective teaching and focus on student achievement. In addition, New School may have the opportunity to hire highly-qualified new teachers who will infuse new talent into the community. Thus, New School will be able to match teacher capacity to the needs of the students in a specific school. Along with structural changes that will differentiate New School from Long Island City, the possible change in staff and administration will enhance New School's ability to best serve students.

Comments 29, 43 and 44 ask about evidence that the Turnaround model will work, past implementation of the 18-D process, and specifically which schools have done this successfully, how, and what measurements of success were used. As described above, the hiring process for new schools replacing a closing/phasing out school is implemented according to Article 18-D of the existing contract between the DOE and the UFT.

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

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

Below are a few examples:

- The new schools located on the Springfield Gardens Campus in Queens had a graduation rate of 68.0% in 2010, compared to Springfield Gardens High School's graduation rate of 41.3% in 2002.
- The new schools located on the Evander Childs Campus in the Bronx had a graduation rate of 69.1% in 2010, compared to Evander Childs High School's graduation rate of 30.7% in 2002.
- The new schools located on the Park West Campus in Manhattan had a graduation rate of 70.4% in 2010, compared to Park West High School's graduation rate of 31.0% in 2002.
- In 2010, the schools on the Van Arsdale campus in Brooklyn had a graduation rate of 82.9%—nearly 40 points higher than the former Harry Van Arsdale High School's graduation rate of only 44.9% in 2002.
- The Erasmus Hall Campus graduated only 40.7% of student in 2002. The new schools on the Erasmus campus are graduating 75.8% of students in 2010, a 35 percentage point increase over the closed school.

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.

Comment 1t contends that other schools with more serious safety issues are not facing closure while Long Island City has not received sufficient School Safety Agents and saw a decrease in its School Environment sub-grade as it reports every safety incident. School security agents are assigned based on needs factors such as crime in the area and in the school and population in the

school. While the school learning environment rating is accounted for in the overall review of a school, the State PLA status is not impacted by the NYCDOE learning environment survey.

Comment 1u asks if the DOE has already decided to close the school given that a principal for New School is already selected.

The proposal for the closure of Long Island City and opening of New School requires approval by the Panel of Educational Policy, which is scheduled to meet on April 26, 2012. Until that time, no decision has been made or finalized..

Comment 2b asserts that the list of high schools identified for Turnaround has a high proportion of English Language Learners and Special Education students. The % of ELLs across the 26 schools currently proposed for closure is 18%, compared to a citywide average of 14%. The % of IEPs across the 26 schools is 16%, compared to a citywide average of 15%. The DOE's intention in proposing the closure of Long Island City and replacement with New School is to rapidly create an improved instructional environment that incorporates the best elements of Long Island City with new staff and new programmatic elements in a new school. If this proposal is approved, students with disabilities attending New School will continue to receive mandated services in accordance with their Individualized Education Programs ("IEPs"). Long Island City currently offers English as a Second Language ("ESL") services and a Transitional Bilingual program for Spanish. All ELL students at New School will continue to receive mandated services and the ESL and Transitional Bilingual programs will be maintained. New School will also seek to create a more streamlined accountability system to ensure that all ELLs and students with disabilities ("SWD") are receiving mandated services. For students who need additional support, New School will provide and build upon several structures that have proven effective at Long Island City. For example, there will be improved credit recovery opportunities, as well as after school and Saturday programs. For students with special needs, a clear system of differentiated, scaffolded support and inclusive structures will be developed, along with formative assessments to monitor their ongoing progress and ensure they are receiving high level academic and technical instruction.

Comments 8a and 22 asserts that the school was negatively affected by a reduced budget. While the DOE acknowledges that budget cuts have impacted schools across the City, budget cuts have not disproportionately impacted Long Island City specifically or schools that have been proposed for closure and immediate replacement generally. In 2010-2011, individual school budgets Citywide were cut by an average of 4%.

Comment 10d states that no school from Queens has been removed from consideration for Turnaround. The DOE originally proposed the original group of 33 PLA schools for closure and replacement because student achievement is not as strong as it needs to be, and/or the rate of improvement is too slow. However, based upon feedback received from the school communities and additional review by senior leadership at the Department, the DOE concluded that the improvements at a group of schools are sustainable and could lead to a successful school environment without closure and replacement. On April 2, 2012 the DOE decided to withdraw the proposals to close and replace the seven schools which received an A or B grade on the 2010-2011 progress report. The decision to withdraw these proposals was based on evidence of schools' performance and progress and has nothing to do with borough preference.

Comments 11c, 27c, 33, and 37c contend that the proposed closure of schools under Turnaround and the staff hiring process will put a strain on DOE resources and personnel. 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, and is worth the energy and resources required to implement more intensive interventions.

Comments 16 and 36 assert that the proposal for Turnaround at Long Island City is politically motivated and would not benefit students. The DOE's intention in proposing the closure of Long Island City and replacement with New School is to rapidly create an improved instructional environment that incorporates the best elements of Long Island City with new staff and new programmatic elements in a new school. The DOE has demonstrated that closing and replacing low performing schools has improved student outcomes. The proposal to close and replace Long Island City and the other PLA schools works within the agreement negotiated with the United Federation of Teachers (UFT), and specifically implements article 18-D of the UFT contract, which defines the practices for hiring teachers to new schools that are replacing closing schools.

Comment 23 points to general opposition to the proposed plan for Turnaround at Long Island City.

While closing a school may be a difficult experience for the community, the DOE believes that replacing Long Island City with a new school, which preserves the best elements of Long Island City but also puts the most effective educators in front of students, will allow the school's students to improve more quickly—and this will be a long-term stabilizing force for the school and the community.

Comment 35 states general support for the proposal and therefore does not require a response.

Comment 39 states the Progress Report does not take into account the student demographics or variations in the peer group with which the school is compared against.

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 peer index. The peer index is used to sort schools on the basis of the 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 Learners ("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 Long Island City is grouped in its peer group with other New York City public schools with similar student academic and demographic background.

Comment 40 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 41 asks about the engagement process and what part students, parents, and the community play in the process. Last Spring, the Department held meetings to begin or continue conversations with PLA schools and their communities about the schools' performance and possible improvement strategies. In January 2012, after taking into account a number of factors, the DOE decided to implement different, more intensive interventions at some PLA schools. At that time, Superintendents and Children First Network staff met with school communities to talk about the DOE's proposal to close and replace the school.

The DOE issued proposals to close and replace a number of PLA schools between February 27 and March 5, 2012, consistent with applicable New York State law and Chancellor's Regulations. The proposal for Long Island City was posted on March 5, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for Long Island City was held on April 17, 2012, as well as through voicemail and email. Parent feedback is incorporated throughout this document, which is presented to the PEP to help inform their decision about this proposal. The DOE also considered feedback received from the community in deciding whether to continue with the proposal.

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

Comment 45 asks about the supports offered to the existing and new schools. The existing schools will continue to be supported by their networks through the end of the school year. The students will also be supported through the efforts of the Office of Student Enrollment to ensure that students have a guaranteed seat in the new school and receive a clear understanding of their enrollment options.

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

Proposed leaders also continue to be supported by their Children First Network in this work. If these proposals are approved, during the 2012-2013 school year and beyond, as they implement the plans being made this spring and summer, new schools will be supported by their networks, the Division of Portfolio Planning, and, where relevant, their EPOs.

Comment 46 asks about the measures that will be used to evaluate new schools in addition to progress reports and quality reviews. The Division of Portfolio Planning will work with the Networks that support each school to monitor each school's improvement plans and progress in these plans.

Comment 46 also asks about the evaluation of progress under previous interventions. For the first cohort of SIG schools, identified in the 2009-2010 school year, the DOE used the progress report grades and quality review scores through the spring of 2011 to evaluate the progress of these schools. For the second cohort of SIG schools, identified in the 2010-2011 school year, the DOE made qualitative assessments about the schools through visits to the school by Networks, superintendents, other DOE senior staff, and representatives from SED.

Comment 47 asks about the timeline for implementation of this proposal. This proposal will be presented to the Panel for Educational Policy on April 26, 2012. If it is approved, the school will then begin the 18-D process. The new school, with its planned new elements and staff (made up of returning teachers and teachers new to the school), would open in September 2012 and would serve all students currently in the school who have not graduated by that time, as well as any new students who would have otherwise begun attending the closed school.

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

Comment 49 asks about measurement of the new schools' student outcomes. New schools replacing closed schools will receive a progress report after the 2012-2013 school year; in other words, a progress report will be issued in the 2013-2014 school year assessing the school's progress during the 2012-2013 school year. The reports issued in 2013-2014 will only be based on those measures which provide "snapshots" of data over a one-year period, such as the percentage of students earning 10 or more credits in their first year for high schools and the percentage of students earning a 3 or 4 on the State Math exam for middle schools.

These schools will not, however, receive an overall progress report grade in 2012-2013, as this measure is dependent upon year over year growth, which will only be available after the schools' second year in existence. Therefore, these schools will receive an overall progress report grade for the first time after the 2013-2014 school year.

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

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

Comment 50 asks about the impact of the new schools and the closure/replacement approach.

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

By closing Long Island City 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(s) (and Building Utilization Plan, where applicable) for the particular proposal.

Comment 51 concerns planning teams for the new schools. Planning teams for each school are composed of the proposed leaders for the schools, as well as the schools' Children First Networks, and EPOs (where applicable). These teams are also receiving support from the Office of School Development, in the Division of Portfolio Planning.

Comments 52, 53, and 54 concern JIT reviews. 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 55 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 59 asks about whether rising ninth graders can opt out of the replacement school. All students who currently attend the school, as well as all of those who would otherwise have attended the existing school for the first time, will have a guaranteed seat in the new school. The DOE believes that New School will support student success at a level that the current school cannot, and therefore all students are encouraged to take advantage of their guaranteed seat in the new school.

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

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

Comments 56 and 57 concern the availability of SIG funding. New York City received \$58,569,883 in funding from SED for 2011-2012 to support implementation of School Improvement Grants in 44 schools (19 Transformation, 14 Restart, and 11 phaseout replacements funded under the Turnaround model). As discussed in more detail in the EISs, outstanding funding for the Turnaround and Restart schools was suspended by the New York State Education Department after the DOE and UFT were unable to reach an agreement on a new teacher evaluation system by January 1, 2012. The DOE is hopeful that this SIG funding will be restored to some of these schools based on the new SIG proposals submitted to SED in March 2012. If the State approves the DOE's application to place New School into the Turnaround model, New School will be eligible for up to \$2M per year as part the School Improvement Grant program. However, the challenges in these schools are too great, and the need to overcome those challenges is too urgent, to not take immediate action to address key aspects of the school's culture, systems, and staffing, whether or not SED ultimately authorizes funding.

Comment 60 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 58 does not directly relate to the proposal and does not require a response.

The DOE received a petition opposing the proposals to close and replace schools, which was signed by approximately 1,300 people, on the following grounds:

- a. The DOE should not close schools and instead support them, including providing proven programs and curricula, professional development, health services for students, and additional student time for tutoring and enrichment.
- b. End the policy of sending large concentrations of high needs students to schools then targeted for closure.
- c. End the policy of co-locating charter schools in buildings with struggling district schools or district schools assigned large numbers of high needs students.
- d. Create a new chancellor's district to support struggling schools and schools with large populations of high needs students, such as the one in place before the current administration.

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

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

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

The DOE currently supports struggling schools through the Children First Network selected by each school. In some cases, these schools work with the network to create an action plan for improvement. Also in some cases, such as for some of the schools approved for phase-out during the 2010-2011 school

year, struggling schools are supported through a designated Transition Support Network. Additionally, schools are supported by the Division of Students with Disabilities and English Language Learners, as well as the Office of Postsecondary Readiness.

Changes Made to the Proposal

No changes have been made to this proposal.