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Chancellor

Public Comment Analysis

Date: April 25, 2012

Topic: The Proposed Closure of August Martin High School (27Q400) and the Opening of New School (27Q368) in Building Q400 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 August Martin High School (27Q400, "August Martin,") an existing district high school in building Q400 ("Q400") located at 156-10 Baisley Boulevard, Queens, NY 11434, within the geographical confines of Community School District 27. It currently serves students in grades nine through twelve. The DOE is proposing to immediately replace August Martin with New School (27Q368, "New School"), a new district high school serving students in grades nine through twelve in building Q400.

If this proposal is approved, August Martin 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.

Building Q400 houses an Alternate Learning Center (Q995, "ALC"), where students attend school while they are suspended from their regular school.

August Martin offers four Career and Technical ("CTE") pathways. It admits students through the Citywide High School Admissions Process through screened, limited unscreened, and educational option 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 August Martin and replacing it with New School, the DOE is seeking to expeditiously improve educational quality on the August Martin campus. If this proposal is approved, New School will develop rigorous, school-specific competencies to measure and screen prospective staff – including August Martin 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. Doing this important work to improve the quality of teaching and learning in the school, DOE also will maximize New School's chance of receiving up to $1,150,000 in

supplemental federal funding under the federal School Improvement Grant ("SIG") program. New School will build on the strongest elements of August Martin and incorporate new elements, including new talent designed to better meet student needs. Thus, the immediate closure and replacement of August Martin 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 August Martin.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at school building X125 on April 16, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 200 members of the public attended the hearing, and 28 people spoke. Present at the meeting were August Martin School Leadership Team ("SLT") Representatives Jose Ferruzola, William Perry, and Ricky Davis; Senator Shirley Hutley; Council Member Ruben Wills; Council Member James Sanders; Assemblymember Vivian Cook; Manuel Caughman from Assemblymember Scarborough's Office; Nathaniel Hezekiah from Representative Meeks' Office; Jamal Wilkerson from Council Member Comrie's Office; and Ruth Bryan from the August Martin Advisory Commission. Community Education Council 27 confirmed they would attend the hearing, but were not present.

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

1. William Perry, SLT Chair, asserted that:
    a. The SLT has already put together a comprehensive educational plan for August Martin.
    b. The DOE should celebrate the improvements the school has made and invest in the school.
    c. The SLT is opposed to the premise and content of the EIS. The proposal is not offering a solution to the problems of the school.
2. Ruth Bryan, Chair of the August Martin Advisory Commission, asserted that:
    a. Anthony Cromer has worked very hard to improve the school, and the school has made progress in performance and in the quality of the programs and building.
    b. August Martin is one of the few high schools that has beaten every NYC performance standard, and has performed better than all the other schools on the PLA list.
    c. The school is named after the first black commercial airline pilot. Changing the name of the school would be an insult to the community.
    d. The way that the DOE removed the principal, including walking him out of the school in the middle of the school day, was disrespectful to him as a professional.
    e. It is unlikely that the new school will be able to immediately fix issues such as overcrowding.
3. Jose Ferruzola, SLT Representative, asserted that:
    a. When August Martin was designated a PLA school in the 2009-10 school year, the graduation rate was 62%. In the following year, the rate rose to 67%. August Martin should not be slated for closure.
    b. Funding, teachers, and resources are being taken away from the school. The school is being setup for failure.

   c. The teachers at August Martin go above and beyond, but the Mayor refuses to visit the school and witness the success for himself.
4. Ricky Davis, SLT Representative, asserted that:
   a. August Martin was the first black commercial airline pilot. Out of the 80,000 commercial pilots in the US, 1% is black. Removing the name of August Martin from the building throws away the history and struggle of our ancestors.
   b. The school's aviation program has a unique value. The students go to public airports and fly planes once a week. The other programs, including the culinary, business and communications programs, are also unique to this school in Queens.
   c. This proposal would disrupt the education of the children in the neighborhood, and that would take away their ability to be empowered.
5. Shirley Hutley, State Senator, asserted that:
   a. The DOE is attacking multiple schools in this community.
   b. If the school was bad enough to be slated for closure, the DOE should have been involved 2-3 years ago to provide resources and guidance.
6. Vivian Cook, Assemblywoman, asserted that:
   a. The elected officials in the community, not the DOE, have invested in the community and in August Martin. Mr. Hilton worked hard to bring the aviation program to the school many years ago. A neighborhood church worked with the school to create the culinary program. Now that they have created innovative programs and cleaned up the building and grounds, the DOE wants to come and take the school.
7. James Sanders, Councilman, asserted that:
   a. The comments at the hearing reflect a sense of community and pride in this school.
   b. The unceremonious and disrespectful dismissal of the principal was wrong.
   c. The EIS mentions a safety concern, but the proposal does not explain how the new school would address this.
   d. The graduation rate is approaching 70%, unlike many other schools, so it is non-sensical to close it.
   e. There needs to be a continued dialogue to understand why the DOE is assessing the progress of the school differently than the neighborhood.
8. Leo Casey, UFT Representative, asserted that:
   a. There is no educational justification for closing the school. The school has a graduation rate that is better than the average.
   b. This proposal is a result of the Mayor's political agenda. It is his way of attacking the union.
   c. The DOE is proposing to change the name of August Martin because they do not understand who he was, his legacy, and his connection to the school. A name is not like a number, the name and this school has a history with the community.
9. Multiple commenters asserted that there are very few black men that are teachers or administrators in the NYC public school system. When you remove a black male principal from his building in the fashion that the DOE did with Anthony Cromer, it sends a message to the students. The principal should not have been treated like a criminal.
10. A commenter asserted that the DOE has usurped the process by removing the driving force that would fight on behalf of the school.
11. Multiple commenters asserted that August Martin's graduation rate is almost 70%, which makes closure inappropriate.
12. A commenter asserted that August Martin is one of the only CTE schools in South Queens, and closing it would be a hardship for the community.
13. A commenter questioned what would happen to the aviation, culinary, and communications programs once the school is closed.

14. A commenter asserted that the teachers have worked hard to move from a 40% to a 67% graduation rate in the past 3 years. There is confusion as to why the school is still on the PLA list, and what the DOE considers to be an achieving school if progress is not taken into consideration.
15. Multiple commenters asserted that the name August Martin speaks to a unique heritage and legacy, and the name of the school should not be changed.
16. A commenter asserted that the goal of the proposal is truly to avoid creating a new teacher evaluation system.
17. A commenter asserted that if this proposal is approved, 50% of teachers will be excessed, which will destabilize schools throughout the system.
18. A commenter asserted that moving 1800 teachers into the ATR pool will cost the city 80 million dollars.
19. Multiple commenters asserted that the aviation program in particular presents a unique opportunity for students that would not be exposed to it otherwise.
20. A commenter asserted that the new principal has little experience with schools of this size and demographic. The community condemns the DOE for sending inexperienced principals to experiment on their children.
21. A commenter asserted that when the DOE closes August Martin and replaces it with 3 schools, the DOE will receive 10 million dollars for each school. The DOE should take that money and invest it in the current school.
22. A commenter asserted that the Mayor's education policies have failed for 10 years. The only policy he seems to have is restructuring.
23. A commenter asserted this proposal is an attack on the community and an attempt to dismantle the schools that are serving it. This is part of a larger plan to destroy black families.
24. A commenter asserted that the teachers have proven that they are invested in the students. The principal was removed because he was an inspiration to the young men in the school.
25. A commenter asserted that there was a recent push to get rid of the ATR pool by the DOE. This proposal will only exacerbate the problem as all the teachers will need to reapply to the school.
26. A commenter asserted that August Martin is a community high school, and closing it will impact all the schools in the area and create a high number of students per classroom in those schools.
27. A commenter asserted that the teachers work hard for the students, and the community works hard for the school. The Mayor is not present to support the school or students, but the teachers and community members are present on a daily basis.
28. A commenter asserted that as a student, he has an investment in the school and plans to return after graduation to help other students flourish. Closing the school will sever those bonds.
29. A commenter asserted that as an airport employee, he has worked to get employment, scholarships, and other opportunities for students at August Martin. August Martin is the reason he got into aviation, and he is committed to the students at the school.
30. A commenter asserted that removing the administration in the middle of the school year was disruptive to the students and a power play instead of a decision that would increase achievement.
31. A commenter asserted that closing the school is not a solution, as the school building is needed.
32. A commenter asserted that although some programs may be doing well, many changes in the school are needed. There is a lack of communication with administrators, who fail to reach out to parents, particularly around attendance issues.

33. Multiple commenters asserted that they received a notice from the DOE about a meeting regarding transfer information for Queens schools, to be held at August Martin HS, at the same time as the Joint Public Hearing. It is unfair for parents to have to choose between both meetings, and creating such a situation amounts to sabotage of the hearing process.
34. A commenter asserted that the Turnaround proposal has created only confusion and chaos, and closure will be devastating to the community.
35. A commenter asserted that the school could achieve much more with adequate support from the DOE. The school has a history of minority gains that have propelled his future as a student, and is preparing him to be a pilot.

The following questions were submitted in writing at the joint public hearing on April 16, 2012:

36. Why didn't the DOE close the school before if the performance has been so poor?
37. If August Martin has the highest graduation rate of all the PLA schools, which is what put them on the PLA list, why would the DOE close it?
38. What will happen to the Aviation, Culinary, and Communications programs?
39. Why is the DOE using "college preparedness" from the Progress Report as a justification for closing the school? It has no impact on the letter grade.
40. How can an increase of 17% in graduation rate in 3 years justify closing the school?
41. The DOE is selective in the data it decides to use to justify its actions. If the DOE is using the Progress Report grade along with first year credit accumulation to justify closing the school, why did the DOE opt to not close the school in September, 2011? That same data was available at that time.
42. A commenter asserted that the Regents exams have changed every year for the past 3 years, which makes it impossible for students to excel.

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

43. A commenter asserted that the DOE must have additional funds available since the city council is pushing a bill to provide transportation for private and parochial schools. These funds should be made available to current schools to give them much needed resources.
44. A commenter asserted that when you have a failing school in the neighborhood property values go down.

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

An additional session for public comment was hosted by the Department of Education at the August Martin Campus on April 23, 2012.

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

45. William Perry, SLT Chair, asserted that:
    a. The official hearing was held last week, and this additional meeting is being held simply to comply with legal requirements. The previous hearing was in conflict with another meeting, so many parents were unable to attend. The SLT and many parents were unaware that this meeting was being held, and this is representative of the way the DOE handles business. The DOE should have contacted the Parent Coordinator to determine the best time to hold the meeting and ensure that parents were informed.

b. The SLT and Advisory Commission have prepared a rebuttal document to the EIS, and would have presented it if they were aware this meeting was scheduled.
c. The SLT and Advisory Commission are opposed to the manner in which the school is being closed down. The community has worked very hard to make the changes needed to have the school removed from the PLA list, and the school would have been removed in June.
d. Most parents do not believe this process is fair. The PEP is loaded with DOE officials and others that the Mayor has chosen. It cannot be considered a fair hearing as it does not require consensus, only majority.
e. Most of the schools being closed via Turnaround are in the borough of Queens, and with a particular demographic.
f. The personnel committee that will be selecting the teachers for the new school does not have representation from the parents or the community. The persons that are making these decisions have no knowledge of the school or the community.
g. Mr. Walcott should address the community and be present at the hearings.

46. Mr. Bold, an SLT member, asserted that:
    a. The PTSA is not present because they had a scheduling conflict. The letter about this meeting was sent on Saturday. This method of informing parents of the meeting was intentional. The DOE is trying to make it inconvenient for the community to attend this meeting.
    b. There was supposed to be a 3 year period for the transformation process, and as of today the criteria for removal from the list has already been met.
    c. The UFT and the DOE were unable to come to an agreement on teacher evaluation, so the Mayor removed the funding that was supposed to come to the school under that program.
    d. Principal Anthony Cromer worked with the community to secure over 2 million dollars to upgrade the communications studio and the kitchen for the culinary school. Elected officials in the community also raised money from their discretionary funds.
    e. The EIS is incomplete, and as of last week the DOE was still making corrections to the document.
    f. There is nothing in the proposal that cannot happen in the current school with proper funding. Cardozo, Bayside and John Brown are not minority schools and their funding is 20-25% more than minority high schools.
    g. The DOE has denigrated the principal, teachers, students, community, and elected officials. The Mayor is not listening to the community during this private battle with the UFT, and students are suffering as a result.
    h. If the proposal is approved, it will be important to ensure that students are matched to the school from both ends of the achievement spectrum, so the school is not overwhelmed with lower level students. An established admission policy instead of a computer matching system will ensure there is a representative population of students that actually want to attend the school.
47. Ms. Bryan, Chair of the August Martin Advisory Commission, asserted that:
    a. The way the DOE is handling the closure of this school is inhumane. The hearing to close this school is not until April 26, and they have already removed the principal.
    b. August Martin has made steady improvement for the past 4 years under the leadership of Anthony Cromer.
    c. The DOE should have waited until June to make leadership changes, which is disruptive to the school. Students are taking exams and preparing to graduate.
    d. The community has made a great effort to support this school. The school wanted to begin a culinary program, and the DOE was unable to provide the necessary funds, so the

community stepped in and funded the program. They also fixed the auditorium and ensured that the Communications Academy had the latest equipment.

e. ISA, the EPO that will be working with the new principal, was supposed to be partnering with Mr. Cromer as well. If Mr. Cromer was unsuccessful, the EPO should be removed as well.

48. Multiple commenters asserted that as a teacher at the school, it is important to teach students about morals, ethics, justice and balance. The system and process surrounding this proposal has been very inconsistent. The school, community and school system need stability, and if the DOE needs to change models midstream, the original determination must not have been thoughtful.
49. Multiple commenters asserted that there was no explanation as to why Mr. Cromer was removed in such an extreme fashion. The students and community are asking for an apology and explanation from the DOE, as many teachers are unable to explain what happened to the school's leader. This needs to be resolved for students as it sends a negative message.
50. A commenter asserted that the invitation to this meeting should not have been sent on such short notice. There are many parents who work and are unable to attend a meeting that is held from 3-6 pm.
51. A commenter asserted that every household with an August Martin student is being disrupted by this proposal.
52. A commenter asserted that the DOE is as responsible for the suggested failure of the school as the principal, teachers and students.
53. A commenter asked whether multiple principals would be assigned to the building.
54. A commenter asserted that the new school should retain the medical technology, culinary, aviation and communications programs, which were all funded by local politicians.
55. A commenter asked whether there will be new teachers that are not members of UFT.
56. A commenter asked whether there would be an SLT in the new school.
57. A commenter asked whether the 18D committee reaches decisions by plurality, consensus or majority.
58. A commenter asked how the new school would include the community in decision making.

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

The DOE received two letters in opposition to the proposal from the August Martin Advisory Commission,

59. The letters asserted that:
    a. August Martin will have met all State targets as of June 2012, which will remove the school from the Persistently Lowest Achieving Schools list. According to the State Education Department, August Martin met all three performance targets for AYP (Graduation, Math and ELL) during the 2010-2011 school year. The graduation rate has increased 27% (from 40% to 67% in June 2011).
    b. August Martin has a demographic that includes 58% Black and Hispanic males, and the school is in the top 30% of all schools in graduating these students.
    c. The EIS states that August Martin does not have the capacity to improve achievement, yet August Martin has improved student achievement faster than any school on the PLA list.
    d. Partnership with ISA (Institute for Student Achievement) has provided only minimal support. ISA was allocated $275,000 to provide coaching and assistance for the school. The content area coaches began in December of 2011. The project manager from ISA

was absent from the school from January-March 2011. Most of the coaches were not familiar with the technology applied in August Martin classrooms.

e. The EIS suggests that the small learning communities at August Martin are not sustainable. The community is very supportive of the school and has provided millions of dollars to build a new TV Studio and Media Center, Culinary Facility & Café, and a Business & Law Courtroom. Students are able to acquire pilot licenses in the Aviation Academy. Medical Technology students intern at area hospitals. The small learning communities are thriving.
f. In light of the inaccuracies presented in the EIS, the August Martin Advisory Commission requests that the school be removed from the PLA list, the principal and name of the school remain in place, and that parents and community members are included in future decisions affecting the school.

The DOE received a letter in opposition to the proposal from Assembly Member Catherine Nolan.

60. The letter asserted that:
    a. August Martin is one of 33 NYC schools designated to receive a School Improvement Grant under Race to the Top. As a result, August Martin was placed in the Restart model, and spent the first half of the year operating under this model. It was not until January, when the DOE and UFT were unable to reach an agreement on teacher evaluations, that the city first began discussing closing August Martin using the Turnaround model.
    b. The sudden change of course will have a negative affect not only on current students, but on outgoing seniors and incoming freshmen as well. The announcement of a possible closure has probably done serious damage to the school's future prospects. Parents will be very hesitant to send their children to this campus, regardless of its future form.
    c. The Restart model was intended to be a long term plan, with the school receiving funds and operating under the model over 3 years. To decide after only a few months to pursue a different and more drastic model is bad public policy.
    d. Not only will five months of work and resources be wasted, but the school will struggle to recover from such a tremendous change.
    e. The Assemblywoman urges the DOE to allow the school to stay in the Restart model.

The DOE received a petition from PTA President Jose Ferruzola.

61. The petition asserted that:
    a. The August Martin Parent Association and the community is against the closure of August Martin and the removal of Principal Anthony Cromer.
    b. August Martin has met every State target two years in a row and should not be on the PLA list.
    c. Principal Anthony Cromer has worked with the community to raise over 3 million dollars to update the Communications Studio, commercial kitchens, flight simulators, and technology throughout the building.
    d. 70% of all incoming August Martin students read below high school level, yet August Martin is able to graduate all of their students.
    e. The special educationpopulation of August Martin is 24%, while the Queens borough average is 12%.

The DOE received the following comments about all closure/replacement proposals for PLA schools:

62. One commenter asked if there will be delays in the implementation of the Common Core Learning Standards as a result of these proposals.
63. 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.
64. One commenter stated that all of the closure/replacement proposals will result in the shuffling of teachers from one school to the other.
65. One commenter asked about which schools have implemented the 18-D process successfully, how this was done, and how the success was measured.
66. 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.
67. One commenter asked what supports are being offered to schools being closed and replaced.
68. 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).
69. One commenter asked about the timeline for the implementation of the new model.
70. 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.
71. One commenter asked about how summer school will be implemented.
72. 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.
73. One commenter asked about the impact of the new schools and implementing the closure/replacement approach.
74. One commenter asked about who makes up the planning team for each school.
75. One commenter asked if the state mandates a JIT review for every school that is Restructuring, Year 1; Restructuring, Advanced; and Persistently Lowest Achieving.
76. 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.
77. One commenter asked if the JIT reports are available to the public.
78. One commenter asked if the proposed new school will receive over-the-counter, ELL, and over-age under-credited students.
79. One commenter asked if rising ninth-grade students can opt out of a turnaround school.
80. 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?
81. 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.
82. One commenter asked if the DOE will have to repay the funding spent on the contracts for restart schools.
83. 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.

84. 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.

85. A commenter contends that the DOE advised CECs not to offer comment at joint public hearings.

86. Multiple commenters submitted emails opposing the proposal and asserting that the proposal is harmful for students, and the school has shown improvement, and is valued by the community

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

Comments 1a and 1c, 22, 31, 45b, 46 ,59f , 86 generally oppose the proposal, state that closure is not necessary, and are critical of the Mayor's policies. 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 August Martin 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.

Comments 4b, 6a, 12, 13, 19, 38, 54 and 61c concern the impact of the proposal on August Martin's Aviation program, culinary, business and communications programs, CTE programming, sports. By proposing to close and replace the school, the DOE is proposing to implemement 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 August Martin instructional programs and will be incorporated into the plans for the new school.

In particular, as stated in the EIS if the proposal is approved New School plans to continue to offering the CTE programming currently available at August Martin, which includes the following CTE Pathways: Media

Production, Culinary arts, Law Academy, and Aviation Technology. Additionally, August Martin's current SLCs: Aviation and Technology, Communication Arts, Culinary Arts, and Legal Studies will also continue to be offered at the New School.

Lastly, if the proposal is approved, the DOE will work New School to ensure the smooth transition of all the current partnerships from August Martin to New School. New School is also expected to offer the same extra-curricular activities and clubs as are now offered at August Martin. 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 August Martin with a new school, which preserves the best elements of August Martin 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 59e erroneously states that the EIS indicates that the small learning communities are not sustainable.On the contrary, the EIS states that the New School is planning to continue and strengthen the existing small learning communities.

Comments 7c and 46e relate to safety, and state that the EIS was incomplete. The proposal has not been amended. Additionally, school safety is addressed in section III of the EIS. Also, the proposed New School plans to offer social-emotional supports that will improve the culture, learning enviornment and overall safety of the building.

Comments 1b, 2b, 2c, 3c, 4a-c, 6a, 7a, 8c, 15, 23, 24, 27, 28, and 29,86 assert that there is qualitative evidence of progress and value at August Martin, such as the current staff's dedication, positive engagement with students, safety, and the school's history in the community. The EIS identifies several areas of success at August Martin, and the DOE recognizes that many members of the community value the school's history. However, the EIS also demonstrates that August Martin is failing students according to a number of performance metrics. The DOE has determined that August Martin 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.

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

Comment 21 asserts that the DOE plans to replace August Martin with 3 schools. This is inaccurate. The DOE only proposes to replace August Martin with one school.

Comment 32 acknowledged that some programs are doing well, but that some changes are needed at the school to address lack of communication, and low attendance. As described above, the DOE has acknowledged that the school has both strengths and weaknesses. 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 2a, 2b, 3a, 7d, 8a, 11, 14, 36, 37, 40, 41, 45c, 46b, 59a-c, 61b, and 61d assert that the school has made progress in test scores, attendance and graduation rates, and inqure why the DOE did not close the school before if the progress had been so poor. In regard to the inquiry related to why the DOE did not close the school before, the previous decision to implement the Restart model was predicated on some positive trends in graduation rates and other outcomes between 2008-2009 and 2009-2010. However, important August Martin's student progress metrics declined during the 2010-2011 school year and based on this most recent data, the DOE believes that students at August Martin would be better served by the implementation of a more intensive intervention.

The EIS acknowledges that August Martin has made some progress in raising graduation rates, graduating Black and Hispanic males and in the English and U.S. History Regents exams.

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:

- 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 August Martin would drop to just 49%, putting the school in the bottom 32% of high schools Citywide.
- August Martin is not adequately preparing students for the rigors of college. Only 3% of students in the Class of 2011 were prepared for college after four years in high school, well below the Citywide average of 25%.1
- 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. August Martin earned an overall D grade on its 2010-2011 annual Progress Report, with a D grade on Student Progress, a D grade on Student Performance, and an F grade on School Environment.

[1] According to the Progress Report College Readiness Index, which is defined as the percentage of students who met the 2012 standards for passing out of remedial coursework at CUNY.

- Safety issues have been a concern at the school in recent years. On the 2010-2011 New York City School Survey, only 55% of students reported feeling safe in the hallways, bathrooms, and locker rooms. This response is in the bottom 1% of high schools Citywide. In addition, only 30% of teachers reported that discipline and order were maintained at the school. This response is in the bottom 5% of high schools Citywide.
- August Martin 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. August Martin's 2010-2011 Quality Review cited a number of serious concerns, including the need to develop coherence and alignment in the school's curricula with State Standards to ensure that all students make progress in their learning. The school also needs to initiate differentiated learning goals in order for students to improve achievement that addresses students' diverse needs and strengths.
- First year credit accumulation is a key predictor of student success because students who fall behind early in high school often have trouble getting back on track to graduate. In 2010-2011, only 59% of first-year students at August Martin earned at least 10 credits. (The Progress Report defines students earning 10 or more credits as students who earn at least 6 of those 10 credits in 3 of the following 4 subjects: Math, English, Science, and/or Social Studies.) This rate of credit accumulation puts August Martin in the bottom 7% of high schools Citywide.

Thus, the DOE has concluded that despite some areas of progress, August Martin should be closed and replaced with a new school. The closure/replacement strategy will preserve the elements of August Martin that have led to improvement, while giving the new school the wherewithal to build upon it and accelerate the pace of change.

Comment 39 inquires why the DOE is including the"college preparedness" measure from the Progress Report as a justification for closing the school. College preparation is one important factor that is measured in the Progress Report. However, there is not any one single reason that drives the decision to close a school, which is a complex and difficult decision to make. In this case, 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 at August Martin that have led to the weak performance.

Comment 42 concerns the Regents exams. 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 across the city take the same test and ultimately the DOE has concluded that the school does not have the a capacity to quickly improve student achievement. The DOE believe that the most expeditious way to improve the educational program for the students currently attending August Martin 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 August Martin access to an improved faculty.

Comments 14 and 37 contend that the school should not be on the PLA list. SED identifies high schools as PLA if they have a State graduation rate below 60% for three consecutive school years or if performance and improvement on the English and Math Regents exams are below a defined threshold. August Martin was

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

identified as a PLA school in 2009-2010 because of its consistently low graduation rate during the three preceeding years (2006-2007 through 2008-2009).

While it is true that August Martin's graduation rate has risen above the 60% threshold for initial PLA designation, that does not mean there is not significant room for improvement. Since August Martin is currently on a PLA list, it is eligible to receive SIG funding under the Turnaround model. If the SIG application for the proposed new school is approved, students will benefit from the additional programs and opportunities afforded by this funding. However, even in the absence of SIG funding, the opportunity for rapid improvement would benefit students and should result in a further rise in the graduation rate.

Comments 4c, 9, 20, 23, 34, 46g, 47a, 48, 51, 60b, 60d, and 84b assert that the proposal is harmful for students, sends the wrong message, and will cause destabilization. While closing a school maybe a difficult experience for the community, the DOE believes that replacing August Martin with a new school, which preserves the best elements of August Martin 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. August Martin 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.

Comments 3b, 5b, 35, 46c,46f, 47d, 59d, 67, and 70 contend that the DOE has not provided sufficient funding or resources to August Martin and criticize the money spent in contract with ISA, the EPO partnerered with the School. New York City schools are funded through a per pupil allocation. That is, funding "follows" the students and is weighted based on students' grade level and needs (as indicated by their incoming proficiency level and special education/ELL/Title I status). If a school's population declines from 2,500 to 2,100 students, the school's budget decreases proportionally—just as a school with an increase in students receives more money. Even if the Department of Education had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls. New schools are funded in the same manner as other schools: funding follows the students and is based on need (incoming proficiency level and special education/ELL/Title I status). While it is true that new schools receive start-up funding, the start-up funding they receive is an average of $30,000 per year over the first five years for an elementary or middle school and $34,000 for a high school. These annual amounts are not even large enough to cover the salary of a first year teacher. In regard to the claim that ISA, the EPO for August Martin, has not provided the services it was contracted to deliver as part of Restart, the DOE requires that there is documentation and certification of delivery of services before payment is issued to EPOs.

With respect to comment 46c, which contends that the Mayor has taken away federal funding from August Martin, as stated in the EIS, SED suspended SIG funing for schools implementing the Restart and Transformation models after the DOE and UFT failed to reach an agreement on a new teacher evaualtion system.

In regard to supports provided to the school, aside from financial supports described above, the EIS describes the leadership, instructional,operational and student supports provided to the school.:

Leadership Support:

- Extensive leadership training for the principal and assistant principal to help them set clear goals for the school while developing the school's Language Allocation Plan.

- Provided specialized support to leadership and staff in identifying and placing English Language Learners ("ELLs") and ensure they are provided with strong and rigorous programs.

Instructional Support:

- Supported and trained teachers on implementing plans in support of citywide instructional initiatives.
- Supported the school in assessment design, curriculum mapping, and student feedback as tools aimed at meeting the necessary standards and expected student outcomes.
- Offered training for staff on successful ways to assess student progress through analysis of student work in order to inform and improve teacher practice.

Operational Support:

- Advised school staff on budgeting, human resources, and teacher recruitment.
- Supported school staff on developing strategies and practices for improving student attendance and creating strategies for targeting attendance concerns.

Student Support:

- Facilitated comprehensive supports to review disciplinary and procedural protocols targeted at improving the school learning environment and impacting student outcomes.
- Supported the school in service management ensuring meaningful and rich relationships with various community organizations, including Community Mediation Services, in order to connect students with counseling services and promote parent engagement.

Even with these supports, however, the DOE has determined that August Martin does not have the capacity to quickly improve student achievement.

Comment 2e states that the new school will not be able to address the problem of overcrowding. As disclosed in the EIS, X125 is not overcrowded. In the 2011-2012 school year, the building utilization rate was only 53-54%. The utilization rate is anticipated to remain stable if this proposal is approved and New School opens in 2013-2014.

Comments 2c and 8c, relate to the naming of the school. The impact of the proposal and planning for thepropsoed new school are outlined in the EIS. The DOE acknowledges that a name change alone will not drive a larger change in school performance or improve teacher quality. 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 event, 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. Consistent with Chancellor's Regulation A-860, parents and community members associated with the proposed new school will be able to make suggestions for the name of the new school. As with all school names, the Chancellor retains final decision-making authority.

Comments 2d, 7b, 9, 10, 20, 24, 30, 46d, 47a, 47b, 47c, 49, 53, 61a, 61c express support for the fomer principal, take issue with the manner in which the former Principal was removed from the school, criticize the DOE's selection of the proposed leader of the New School, and inquire whether multiple principals would be assigned to the building. The DOE acknowledges Principal Cromer's contributions to August Martin. However, the DOE must make an ongoing assessments regarding school leadership

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 decision lightly. The DOE believes that the former principal was not the leader best-suited to quickly improve the achievement of the students in the building and therefore a new leader was installed to continue to move August Martin forward for the remainder of the year and a new leader has been proposed for the new school. The DOE cannot comment further on personnel matters.

Comments 5a , 8b, 30, 46g generally oppose the proposal and assert that it is the product of a political dispute between the UFT and the Mayor. The DOE believes that closing August Martin 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 August Martin, in light of August Martin's inability toimprove quickly.

Comment 7e asserts that the school is being evaluated differently from other schools in the neighborhood. It is unclear what the commenter is referring to. August Martin's performance was compared against its peer schools based on similar student demographics. All schools are measured by the DOE using the same performance metrics. Furthermore, NYSED also evaluates schools using a standard set of metrics. Insofar as there are high schools in the neighborhood that have similar demongraphics as August Martin, those are the schools it is compared to in terms of accountability.

Comments 17, 25,45f, 57, 64, 65, and 66 relate to the hiring process at the proposed new schools, and claim that the proposal will merely result in the shuffling of teachers from one school to another. The guiding principle of this is work is to effectively match teacher capacity to the needs of the students in a specific school along with structural changes to the new school that will enhance the its ability to best serve our students. This means that the new replacement schools will only hire those teachers they believe will be effective and well-matched to their new missions, regardless of where they come from.

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 a minimum of 5 members: two representatives appointed by the UFT President, two representatives appointed by the Chancellor and the principal of the new school. All current August Martin teachers are eligible to apply to New School. The school-based Personnel Committee will evaluate applicants' qualifications. The Personnel Committee should strive to seek consensus in its hiring decisions; however, if consensus cannot be reached, decisions are made by majority vote.

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

Any remaining teacher vacancies will then be filled by the Personnel Committee from applicants from the existing teacher pool, or as with all new district schools, if the school is unable to find sufficiently qualified

applicants from within the existing teacher pool, the school will be provided an exception to hire up to 40% of its teaching positions from outside of the current teacher pool.

Barring system-wide layoffs, excessed teachers will be eligible to apply for other City positions, and any teachers who do not find a permanent position will be placed in the Absent Teacher Reserve ("ATR") pool, meaning that they will continue to earn their salary while serving as substitute teachers in other City schools. This will not count as a cost or savings to New School, but could increase overall ATR costs to the DOE.

With respect to the comment regarding the DOE's track record implementing 18-D, it should be noted that, 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.

Comments 60a, 60c-e and 84a assert that the school should remain in the Restart model, and claim that the purpose of the proposal is to avoid a new teacher evalution system. As described in more detail in the EIS, in Spring 2011, the DOE applied to SED to place August Martin into the Restart model. SED approved the application, conditioned upon the DOE and UFT agreeing by January 1, 2012 to implement a new teacher evaluation system.

However, The DOE and UFT failed to reach an agreement on the elements of a new teacher evaluation system. This means that the Restart model is no longer available for any DOE school, including August Martin. The DOE subsequently reassessed the available interventions for former Restart schools. For reasons stated in the EIS and provided in the prior response, in the case of August Martin, the DOE determined that a more intensive intervention was needed to achieve the desired outcomes for current and future students. Closing the current school and creating a new school to replace it was the only way to implement the needed reforms. Consequently, the DOE submitted applications to the State Education Department to implement the Turnaround model, as a way to potentially restore up to $1,150,000 of SIG funds that will support the New School.

The DOE is hopeful of restoring SIG funding. However, the challenges in this schools are too great, and the need to overcome those challenges is too urgent, to not take immediate action to address key aspects of the

school's culture, systems, and staffing. Therefore, the DOE proposes to implement this proposal regardless of whether SIG funding becomes available.

The DOE believes that the strategy of closing and replacing PLA schools will provide a better educational option to current students more rapidly and with more certainty than Restart, which is no longer available and was simply not adequate in order to make the school an acceptable choice for current and future students. The closure/replacement strategy will preserve the elements of former school that have led to improvement, while giving the new school the wherewithal to build upon it and accelerate the pace of change. The DOE has previously implemented the Turnaround model in connection with the recent phase-out and replacement of other low-achieving schools. In general, new replacement schools opened by the DOE, done as part of the Turnaround model or not, have a strong track record of success.

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.

Comments 33, 45a, 45d, 45g, 46a, 50, 59f, 63, concern the overall process in which DOE sought community feedback. 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 August Martin was posted on March 5, 2012. The DOE solicited feedback from parents through the Joint Public Hearings, which for August Martin was held on April 16, 2012, as well as through voicemail and email. In regard to the Chancellor's presence at Joint Public Hearings, each proposal for a school closure is led by a Deputy Chancellor, who serves as the Chancellor's Designee in addressing the community and leading the joint public hearing proceedings.

The DOE acknowledges that an information session regarding the NCLB Public School Choice Process was inadvertently scheduled on the same evening as the Joint Public Hearing for this proposal. In light of this fact the DOE hosted a second opportunity for the community to provide public comments, on April 23, 2012.

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.

Comment 45e states that the majority of schools being proposed for closure are located in Queens. This is incorrect. Out of the 26 schools proposed for closure and immediate replacement, only 8 schools are located in Queens. Ten schools are located in the Bronx.

Comment 46h refers to the High School Admission process. In New York City, the High School Admissions Process is a Citywide choice process. (Please see "Enrollment Impact for Future High School Students—High School Admissions Process" in the EIS for more detailed information.) The High School Admissions Process permits an applicant to list up to 12 high school programs in order of preference on his or her application. High

school admissions applications were due December 2, 2011. Throughout the City, students who are in ninth grade for the first time can participate in the High School Admissions Process and can apply to attend a different high school for tenth grade. Current ninth-grade students at August Martin who are interested in attending a different school for tenth grade may have already taken part in this process by submitting an application on or before December 2, 2011. Current first-time ninth-grade students at August Martin who have not yet taken part in this process, but now wish to do so, may submit an application during Round Two of the High School Admissions Process in March.

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

The DOE believes that New School will support student success at a level that the current school cannot, and therefore all students are encouraged to take advantage of their guaranteed seat in the new school.

Comment 52 asserted that the DOE is as responsible for the suggested failure of the school. The DOE agrees that it is the DOE's responsibility to provide students with high quality schools and high quality teaching staff. 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.

Comments 56, 59f, 74, relate to new school planning and the community's role in decision-making at the new school. The new school will need to establish a new School Leadership team (SLT) and Parent Association (PA). Consistent with Chancellor's Regulation A-655, the new school will follow the process for establishing a new SLT. Consistent with Chancellor's Regulation A-660, the new school will follow the process for establishing a new PA. School planning teams for each school are typicaklly 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 61e asserts that the special education population of August Martin is 24%, while the Queens borough average is 12%. As stated in the EIS, 20% of August Martin's student population has an IEP, compared to the Citywide average of 15%. Although August Martin may serve more students with disabilities than other schools, August Martin's performance is compared against other schools w ith similar populations in the Progress Report. 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, August Martin is grouped in its peer group with other New York City public schools with similar student academic and demographic background.For example, Bronx Academy of Health Careers (11X290) is in the same peer group with August Martin and received an A on the 2010-11 Progress Report, and has a 70.9% four-year graduation rate and a 69.1 six-year graduation rate. Regardless, the school was designated as a PLA school by the NYSED, and in order to be eliglbe for SIG funding, one of the four intevention models (Transformation, Restart, Phase Out, Turnaround) must be implemented at a PLA school. For reasons stated in the EIS and in this analysic of public comment, the Transformation and Restart models are not available to New York City PLA schools at this time.

Comment 62 asked if 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.

Comments 68 and 72 concern the measures that will be used to evaluate the progress of the new schools, apart from progress reports and quality reviews, 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.

In regard to measurement of the new schools' student outcomes, August Martin 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 2012-2013 Progress Report. The Progress Report methodology is reevaluated each year and this policy is subject to change.

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

Comment 69 relates to the timeline for the implementation of the Turnaround model. This proposal, among others, will be presented to the Panel for Educational Policy on April 26, 2012. If it is approved, August Martin will close at the end of SY 2011-2012. The new school, with its new elements and staff, 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.

Comment 71 inquires how summer school wil be implemented. Summer school will continue to be implemented as in years past. Each year, a number of school buildings host summer school programs. Individual schools choose to affiliate to a particular building for summer school opportunities for their students, which may mean offering their own programs for their students, offering a summer school program in partnership with other schools.

Of the buildings that will be open to host summer school in 2012, some have schools which have been proposed for closure and replacement, though many do not. Regardless, all students currently attending a school proposed for closure and replacement will have the opportunity to attend summer school, either in their home building or in the one with which their school has affiliated. Students are typically assigned to summer school during June, and this same process will be in place this year for students in all schools, whether they attend one proposed for closure or not.

For more information about summer school, please see the DOE's Web site at:
http://schools.nyc.gov/ChoicesEnrollment/SummerSchool/default.htm

Comment 75-77 inquires about the 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 78 inquries whether the proposed new school will receive over-the-counter, ELL, and 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 79 inquires whether ninth-grade students can opt out of a turnaround 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 August Martin, 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 80 and 81 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? New York City received $58,569,883 in funding from SED for 2011-2012 to support implementation of School Improvement Grants in 44 schools (19 Transformation, 14 Restart, and 11 phaseout replacements funded under the Turnaround model). As discussed in more detail in the EISs, outstanding funding for the Turnaround and Restart schools was suspended by the New York State Education Department after the DOE and UFT were unable to reach an agreement on a new teacher evaluation system by January 1, 2012. The DOE is hopeful that

this SIG funding will be restored to some of these schools based on the new SIG proposals submitted to SED in March 2012. If the State approves the DOE's application to place New School into the Turnaround model, New School will be eligible for up to $1.15M 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 82 inquires whether the DOE will have to repay the funding spent on the contracts for restart schools. The DOE is currently working with six Educational Partnership Organizations (EPO)s to support 14 schools. The DOE has committed to provide funding for the EPO contracts through the conclusion of this school year. This commitment should ensure that the programmatic initiatives that EPOs have in place this year at Restart schools can be completed with fidelity. This commitment to fund the contracts regardless of SED's reimbursement is only for this school year. The future work of EPOs may not continue if the Department unable to gain access to SIG funding.

Comment 18, assert that moving teachers in the ATR pool will cost the city $80 million. This estimate depends upon several inaccurate and improbable assumptions: First, it assumes that 50% of the staffs in the 33 schools originally proposed for closure and replacement will be replaced. However, the DOE has since withdrawn several proposals. Furthermore, the comment does not take into account that new schools may in fact hire back more than 50% of current staff. Second, the comment assumes that all teachers who are not re-hired at New School will join the ATR. Yet, it is highly likely that some members of the teaching staffs at the schools proposed for closure who do not apply or are not rehired at the new schools may choose to retire or leave the system to find jobs in other districts or paths. Therefore, these staff members will not join the ATR.

Comment 47e is critical of the EPO and suggests that the EPO should be removed. 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 83 references a petition signed by approximately 1,300 people that opposing the proposals to close and replace schools. As stated earlier, the DOE has provided several supports to the schools in question, but believes only their closure and replacement will accelerate the pace of change needed to achieve the desired improvement for current students in these schools.

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

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

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

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

Comment 85 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.

Changes Made to the Proposal

No changes have been made to this proposal.