



Public Comment Analysis

Date: February 2, 2011

Topic: The Proposed Phase-out of Christopher Columbus High School (11X415) and a District 75 School High School Inclusion Program (P010X@Columbus)

Date of Panel Vote: February 3, 2011

Summary of Proposal

Christopher Columbus High School (11X415, “Columbus”) is an existing zoned high school located at 925 Astor Avenue, Bronx, NY 10469, within the geographical confines of Community School District 11 (“District 11”). It currently serves students in grades nine through twelve. Columbus is currently co-located with Global Enterprise High School (11X541, “Global Enterprise”), Collegiate Institute for Math and Science (11X288, “Collegiate Institute”), Astor Collegiate Academy, (11X299, “Astor Collegiate”), and Pelham Preparatory Academy (11X542, “Pelham Prep”). All five schools currently enroll students in grades 9-12. There is also a District 75 school that has an Inclusion Program in building X415 (“P010X@Columbus”), which serves students with a range of disabilities in grades 9-12. P010X students are enrolled in Columbus’ general education classes, and, depending on their individual needs, receive Special Education Teacher Support Services (“SETSS”). X415 also houses a Young Adult Borough Center (“YABC”) at Columbus. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, libraries, gymnasiums, and cafeterias.

The New York City Department of Education (“DOE”) is proposing to phase out and eventually close Columbus based on its longstanding poor performance and the DOE’s assessment that the school lacks the ability to turn around quickly to better support student needs. Because the P010X@Columbus students attend class with Columbus students, this program will be phased out concurrently with Columbus. The educational impact statement (“EIS”) describing this proposal was published on December 20, 2010 and amended on January 19, 2011. The EIS and amended EIS are available at the following link [<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Feb32011Proposals>], and hard copies are also available in Columbus’ main office.

If approved, Columbus and P010X@Columbus would be phased out gradually over the next several years while the existing schools in X415 continue to serve their current students.

Columbus and P010X@Columbus would no longer admit new ninth-grade students after the conclusion of the 2010-2011 school year. Current students would be supported as they progress towards graduation while remaining enrolled in Columbus and P010X@Columbus. The YABC program in X415 will not be impacted by the phase-out.

In a separate Educational Impact Statement (“EIS”), posted on December 20, 2010, the DOE is also proposing to co-locate 11X508, a new high school with a “Limited Unscreened” admissions policy, in building X415. If approved, 11X508 would begin phasing into the building with a ninth-grade class during the 2011-2012 school year. The new school would grow to full-scale as Columbus and P010X@Columbus phase out, and would complete its expansion during the 2014-2015 school year, at which point it would serve students in grades 9-12.

In the event that the phase-out of Columbus and P010X@Columbus is not approved, the DOE would re-examine the availability of space in the building, and may, as appropriate, revise its proposal to co-locate 11X508 in X415. Such a proposal would be described in a revised EIS.

Summary of Comments Received Prior to the Official Public Comment Period

Certain comments were received during meetings with parents and community members prior to the comment period on this proposal. Although these comments were not received during the comment period, as a courtesy, the DOE wishes to acknowledge that comments were received describing some of the positive changes the college office had made this year; citing concerns about the Quality Review process; and providing support for the charter conversion plan put forth by the school. The positive changes made at the school and general concerns about assessment, as well as the charter conversion proposal, are addressed in greater detail below, particularly in responses to comments 23 and 24.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at X415 on January 20, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 340 members of the public attended the hearing, approximately 35 people spoke and approximately 36 questions were submitted. Present at the meeting were District 11 Community Education Council (“CEC”) member Petra Poleon; Columbus Principal and School Leadership Team (“SLT”) member Lisa Fuentes; Pelham Prep SLT member Theresa Garcia; Collegiate Math and Science Principal Estelle Hans; Astor Academy Principal Sandra Burgos; P010X Principal and SLT member Barbara Hanson; Citywide Council on High Schools (“CCHS”) member Constance Asieudo; Panel for Educational Policy (“PEP”) member Monica Major; State Senator Jeff Klein; Ritchie Torres, a representative from Council member James Vacca’s office; Deputy Chancellor Santiago Taveras; Superintendent Geraldine Taylor-Brown; and Executive Director of School Programs and Partnerships Gregg Bethel. Global Enterprise Principal Michelle Joseph committed that an SLT member would be present; however, none attended and did not provide notice that they would not attend.

The proposal to co-locate 11X508 was also addressed at this hearing. The analysis of comments concerning that proposal can be found at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Feb32011Proposals>.

The following comments and remarks were made at the joint public hearings:

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A. Comments made by principals and other SLT members:

1. Principal Lisa Fuentes and members of the Columbus SLT made a presentation about the history of the school, which opened 72 years ago in 1939, and presented an alternative proposal to convert the school into a charter high school. Along with colleagues from the SLT, she discussed the history of the diverse student population and how it has changed over time. They mentioned various programs offered over the years, expressed concerns about the accelerating expectations for graduation rates, and described the negative impact of the extended schedule the school adopted to manage overcrowding. Other colleagues discussed the benefits of the proposed charter school, how it would operate, and the type of student population it would serve. Principal Fuentes thanked various elected and community supporters and read a statement from Councilman Robert Jackson in support of the school.
2. Columbus SLT member and parent Belinda Brown stated that her daughter had improved academically as a result of the school's efforts. She further stated that social factors should be considered and support provided before closing Columbus.
3. Barbara Hanson, Principal of P010X (District 75 School co-located with Columbus) described her positive experience working with Principal Lisa Fuentes and stated that the Columbus teachers have supported her school since it opened in the building. She expressed how welcoming Columbus staff members were when P010X was placed in the building. She requested the DOE to reconsider its proposal to close Columbus.

B. Comments by elected officials and their representatives

4. A representative of Council member James Vacca, who is a graduate of Columbus, stated that the decisions about Columbus do not belong to "a few bureaucrats," but rather that they belong to the school community. The representative further expressed support for the charter conversion.
5. A representative read a statement on behalf of Robert Adams, former Bronx Borough President and NYS Attorney General, who opposes the closure of Columbus based on its legacy and past achievements.
6. Council Member Jackson submitted a statement which was read by Principal Fuentes in support of the charter conversion proposal for Columbus.

C. Comments by other individuals

7. Leo Casey, UFT Vice President, stated that Columbus was not Mayor Bloomberg's private property to "sell off to the highest bidder" and feels that the city has betrayed Columbus. He stated that the DOE has filled Columbus with the "most challenging" students and provided no support to teach those students.

8. Robert De Sena, President for Council for Unity, spoke about the partnership between his organization and Columbus. He discussed their youth development program which seeks to get students back on track toward graduation. He stated that it is the responsibility of the DOE to provide additional resources to struggling schools.
9. A Columbus teacher challenged the comparison of Columbus to Truman High School, stating that Truman serves “far fewer” English Language Learners and newcomers, is less overcrowded, and has less “economically disadvantaged” students. She shared writings from her students, which suggested that many students did not complete homework because of their active work schedules after school and on the weekends. She also shared a list of written questions and comments:
 - a. If building utilization rates drop from 100% to 80%, it would mean a reduction of roughly 600 students; where would students who need additional services go?
 - b. How does “intensive support” come to mean phase out?
 - c. The EIS states that the DOE consulted with superintendents and other experienced educators who have worked closely with the school, but the commenter feels that the last superintendent to have worked closely with the school did so in 2005.
 - d. How can the PEP be taken seriously for decision-making when the majority of its members are controlled by the mayor?
 - e. Though the four-year graduation rate places the school in the bottom 7% of Bronx high schools, does the DOE consider the fact that the school is the single most challenged high school in the City due to DOE admissions policies and practices?
 - f. Demand for the school cannot be considered low when there is documentation showing that over 1600 students applied for places in September 2009 and over 1400 applied for places in September 2010.
 - g. The DOE supports listed were selected and paid for by Columbus, with the exception of ARIS. Columbus applied for and administered grant money to improve the media center, and was helped by City Council member James Vacca, not the DOE.
 - h. The DOE’s summary of the parent meeting held at the school on November 18, 2010 was disputed; a recording was requested.
 - i. Confusion about options available to Columbus was attributed to the DOE representatives’ inaccurate claims that charter conversion would not be a possibility.
 - j. Columbus feels it has been the victim of overcrowding and forced to use building space inappropriately, which has contributed to poor student achievement; future phase-out plans will exacerbate the problem.
 - k. Charter school enrollment plans are mentioned in the EIS; are there plans to site a new charter in the building?
 - l. How will it be possible to provide more individualized attention to students as the school gets smaller? If the school will get less per-pupil funding per year as it phases out, how will it operate at all?
 - m. Does the State allow a turnaround school to be phased out?
 - n. If the PEP approves this proposal, will OTC students who are facing special challenges, including new immigrants, safety transfers and over-age, under credited students, continue to be sent to Columbus?

- o. Since the school has not felt supported by the DOE to date, how can it expect to be supported through phase-out?
 - p. Will work-study partnerships with organizations such as the Hebrew Home for the Aged be affected?
 - q. Will students continue to have access to both Information Technology and culinary arts Career Training Education (“CTE”) programs if Columbus is phased out?
 - r. Though it is stated that any student who applied for a zoned school as their first choice is guaranteed admission, this was not the case last year. Families were discouraged from attending Columbus in letters sent to their homes; will this happen again?
 - s. Why are there so many high needs OTC students that have been turned away from other schools? How are they being supported for success?
 - t. Columbus disputes the enrollment data provided in the EIS and contends that 180 students were admitted on July 2, 2010 and a further 179 students admitted into all grades since school began, rather than the 67 list notice freshmen and 207 OTC students cited in the EIS.
 - u. Do students have enough access to CTE programs in their own neighborhoods?
 - v. How will a building with 5 science labs house 7 schools?
 - w. As stated in the EIS, Columbus is currently operating with 11 classrooms below Footprint; space and scheduling challenges have impacted student outcomes.
 - x. The possibility of adding an eighth school to the building has been mentioned; when is this expected to take place?
 - y. Why does the DOE assess the need for seats on a borough-wide rather than community basis? How does it address overcrowding and under-utilized space?
 - z. How does the personnel impact take into consideration the possible end of last in, first out rules? Fair Student Funding penalizes schools with senior staff.
10. Multiple commenters cited Columbus’ long, rich history as a valuable asset to the community and stated that it was worth saving.
 11. Multiple commenters suggested that the school’s funding should be restored and further resources should be allocated towards rehabilitating Columbus, as opposed to closing the school.
 12. Multiple commenters attributed Columbus’ current situation to various factors, such as overcrowded classrooms; poverty; students having to work long hours after school to support themselves; budget cuts; a large population of English Language Learners; and insufficient funding to support the needs of the student population.
 13. Multiple student commenters described the supportive learning community within Columbus as an argument against closing the school.
 14. Multiple commenters felt that it is unfair the school is being closed after students and staff members planned the renovation of the school library.
 15. A commenter suggested that closing Columbus would lead to other city schools being overcrowded.
 16. Some commenters identified themselves as alumni or current students of Columbus and expressed disagreement with the proposal to close the school based on their positive experiences during high school.

17. A commenter expressed support for the Columbus teachers for taking “failing” students and turning them into children that can pass and go to college.
18. A student commenter attributed poor student attendance to the school safety procedure, since students “don’t want to be touched.”

The DOE received two comments at the Joint Public Hearing which did not directly relate to the proposal.

19. A comment made reference to the new Chancellor’s inexperience as an example of the education system being “under attack” and that millions of funds won in a lawsuit are being misdirected by the new governor to private charter schools.
20. A comment was made that if the new Chancellor’s comment about “birth control” was said by a teacher, that teacher would be removed from the classroom, as per Chancellor’s Regulation A-421 (defining verbal abuse).

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

21. A commenter expressed opposition to the phase-out proposal and stated that their children had a safe and supportive educational experience at Columbus.
22. A commenter in opposition to the proposal described the successful partnership between Columbus and the Hebrew Home for the Aged at Riverdale, praising the work-study program for special education students and stating that the partnership provides important training for students and some have gone on to work at the Home.
23. Columbus SLT member Christine Rowland submitted a rebuttal to the Fact Sheet issued by the DOE, stating:
 - a. Columbus has a wide range of programmatic and extracurricular offerings and has served a diverse range of students over the years; now it has the students who face the most challenges when they arrive, with the lowest peer index in the City, many of them coming over-the-counter; why hasn’t the DOE helped Columbus by examining this situation and creating a plan for the school’s success?
 - b. The closure of large high schools and the opening of new small schools, which had a two-year grace period in which they were not required to enroll ELLs or special education students resulted in larger special needs populations in existing schools; between 2001 and 2006 Columbus went from 6.8% to 24% special needs;
 - c. Comparison schools on the Fact Sheet were inappropriate; Fannie Lou Hamer Freedom School cannot be compared to Columbus because it is an alternative assessment school; Harry S. Truman is an inappropriate comparison because Columbus serves many more recent immigrants, many more students considered “economically disadvantaged,” and is operating far above building capacity, while Truman is operating well below;
 - d. The budget has been cut by over \$4,000 per child over the last four years; the budget did not allow the school to hire a teacher for every classroom;
 - e. Many of Columbus’ successful programs split off to become small schools;
 - f. The school’s D grade on the 2009-2010 Progress Report was unfair:

- i. The peer group does not provide an accurate comparison; it contains only 23 schools and only 17 have Progress Report grades;
 - ii. The peer index calculation includes many students without 8th grade scores due to being ELLs or having poor attendance, so these students are not factored into the report correctly;
 - iii. Many of the first-year students struggling to accumulate the 10+ credits have a history of low attendance, and many of them have a commute to school of around 30 minutes; this is not factored into the report;
 - iv. It is particularly difficult for Columbus to get the extra credit due to the student population;
 - g. The school has been working to improve, creating smaller learning communities and implementing curriculum improvements and Common Core Standards;
 - h. The school proposes to be converted into a charter school;
 - i. Students have applied to Columbus in large numbers, despite efforts of the DOE and the Mayor to paint the school in a negative light, and despite the confusion and complex process around last year's phase-out proposal and the lawsuit which overturned the vote to implement it;
 - j. Columbus refutes the DOE's claims to have provided professional development, teacher supports or opportunities to collaborate with colleagues at other schools; all were organized by external organizations, came from the school's budget or from a grant which the school applied for;
 - k. Only one superintendent has truly supported Columbus over the last 10 years, and she was in place for a year and a half;
 - l. Columbus refutes the DOE's claim to have facilitated partnerships with the school;
 - m. Columbus refutes the issues the DOE says were raised at the parent meeting; parents said they want to keep Columbus open;
 - n. The commenter suggested:
 - i. Improving enrollment practices by allowing zoned schools to operate as limited unscreened schools (giving a preference to students who show an interest in attending their neighborhood school);
 - ii. Fixing the Progress Report issues that prevent the school from being appropriately graded;
 - iii. Creating an office of school improvement to better support struggling schools.
24. A commenter expressed support for the charter conversion of Columbus, citing:
- a. Smaller schools are not necessarily better; Columbus offers a breadth and depth of options for educational and extracurricular opportunities;
 - b. The importance of relationships and support provided to young adults in the high school years;
 - c. The phase-out process is traumatic for the schools involved; creating choice should not involve this level of disruption;
 - d. The DOE should improve its decision-making process to be more careful and collaborative.

25. The DOE received a comment concerning all phase-out proposals calling for a moratorium on school closings, which stated that the DOE is the servant of the people and is not acknowledging the community's opposition to these proposals. The commenter suggested a facilitated discussion process which would work towards consensus.
26. Columbus School Leadership Team member Christine Rowland also submitted an article that she authored examining graduation and dropout rate data. The article refuted the claim that phasing out a school would increase students' chances of graduating at Columbus. The author made the following assertions:
 - a. Graduation declined at Bronx high schools Roosevelt and Taft during the years they phased out, with the final two cohorts doing significantly worse.
 - b. These graduation rates did not compare favorably with either the citywide average for those years or with two schools proposed for phase-out, Columbus and Kennedy.
 - c. Dropout rate data for students from Roosevelt and Taft were also high. In particular, the percentage of students dropping out rose dramatically over the four phase-out years.
 - d. Roosevelt and Taft also discharged a large number of students, making dropout rates even higher at these schools. While the commenter acknowledged the number of discharged students includes students who left for GED programs, she asserted that advocates believe many discharged students would be more accurately counted as dropouts.
 - e. The DOE needs to consider the "domino effect" phasing out has on other schools. The commenter cited an internal DOE report and a report by the Independent Budget Office to show that the DOE knows that schools under threat of phase-out have higher concentrations of need than their peers.
 - f. The DOE should have a more balanced admissions process for the future.

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

Comments 2, 3, 4, 5, 10, 13, 16, 18, 21, and 23 (g) are all related to the factors taken into consideration when making a decision to phase-out a school. The DOE believes that every student is entitled to an excellent education regardless of their background. Columbus began serving high school students in 1939, and while the school has a rich history with many distinguished graduates, the poor performance at Columbus over recent years indicates there is a need to create better options for future students.

Deciding to phase out a school is the toughest decision we make. Every year, the DOE identifies which schools are having the most trouble serving their students. We compile a preliminary set of schools that could possibly be considered for intensive support or intervention by looking at all schools that receive a grade of D, F, or a third consecutive C or lower on the Progress Report, and schools that receive a rating below Proficient on the Quality Review. We also take into account how the State assesses the school's performance, by including schools identified as Persistently Lowest Achieving (PLA) in this first group.

Elementary and middle schools that score higher than their district average in English Language Arts and math, high schools with graduation rates higher than the citywide average, schools earning a Well Developed or Outstanding score on the Quality Review, or schools receiving a Progress Report for the first time are removed from the list and not considered for significant actions.

With this smaller set of schools, we undergo in-depth conversations with school communities and networks to get an even better sense of what is happening at this school, and whether more significant action is needed. We continue to consider performance data, school culture, and demand information. Eventually, we are left with a set of schools that are not serving their students well enough and need more aggressive supports and intervention.

Based on an extensive review of data and community feedback, the DOE has determined that Columbus is unable to turn around and cannot provide a high-quality education to its students. The DOE believes that only the most serious intervention—the gradual phase-out and eventual closure of Columbus—will address the school's longstanding performance struggles and allow for new school options to develop in building X415 that will better serve future students and the broader community. We are proposing to phase out the school because we think it is the right thing for our students.

Comments 7, 9(e), 12, 17, 23(b) and 23(c) concern the challenges faced by the Columbus student population. Like most New York City public schools, Columbus serves a high-need population. 26% of students require special education services and 18% are English language learners. In 2009-2010, Columbus' four year graduation rate (including August graduates) was 47%. But other schools serving similar students have achieved far better results.

- At Harry Truman High School, a Bronx school, 25% of students require special education services and 9% of students are English language learners. The school achieved a 64% four-year graduation rate in 2009-2010, with 55% of students earning Regents diplomas.
- At Morris Academy for Collaborative Studies, a Bronx school, 25% of students require special education services and 19% of students are English language learners. The school achieved a 67% four-year graduation rate in 2009-2010, with 35% of students earning Regents diplomas.
- At Bushwick Leaders High School for Academic Excellence, a Brooklyn School that serves approximately 500 students, 20% of students require special education services and 21% are English Language Learners. The school achieved a 57% graduation rate in 2009-2010 with 72% of students earning at least 10 credits in the first year.

- At Cobble Hill School of American Studies, a Brooklyn School that serves approximately 500 students, 21% of students require special education services and 5% of English language learners. The school received a 64% graduation rate in 2009-2010.

While all students are still not where we'd like them to be, these schools are getting better results while serving a similar mix of students to Columbus.

A Progress Report accounts for the unique student population that a school works with. For high schools the percent of self-contained students is part of the peer index (both as part of the percent of students with individualized educational plans ("IEPs") and again on its own), so peer schools tend to have roughly similar percentages of self-contained students. The graduation outcomes of self-contained students also receive additional weight in the weighted Regents diploma rate.

In addition, the high school peer index is based on the average 8th grade proficiency, double the percentage of special education students, double the percentage of self-contained students, and the percentage of overage students on entry to the school. As a result, schools in the same peer group generally have comparable mixes of students who were struggling academically before high school, who have an individualized education plan ("IEP") (and particularly those with the most restrictive program recommendation), and who enter the school overage. We are particularly aware of the challenge of graduating self-contained students, which is why we effectively give the percent of such students double-weight in calculating peer groups. As a result of our peer group methodology and the adjustments we provide within individual metrics for achieving strong outcomes with highly challenging student populations, a high school's Progress Report score accounts for and controls for the percent of self-contained, other special education, ELL, or overage students, and the average 8th grade proficiency of the students it serves.

Comments 9(l), 11, and 23 (d) concern the sufficiency of funding. Most funding in school budgets is allocated on a per-pupil basis. For each student no longer on the Columbus roster as the phase-out is implemented, the school is expected to receive approximately \$4,181 less per pupil funding annually for high school students. These estimates are based on current Fair Student Funding (FSF) per capita allocation levels and are subject to annual variation. FSF covers basic instructional expenses and FSF funds may, at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs.

As a result of the phase-out, the total number of students enrolled at Columbus will decline each year, meaning that the school will need fewer teachers and fewer supplies to meet the needs of its smaller student population. If for some reason the overall school enrollment grows again, the overall budget will increase accordingly. In any case, funding will be provided in accordance with enrollment levels, allowing the school to meet the instructional needs of its student population. This is how funding is awarded to all schools throughout the City, with budgets naturally increasing or decreasing as enrollment fluctuates from year to year.

For this school year, the DOE cut individual school budgets by an average of 4%. We worked hard to be fair to schools, so they all share a similar burden. Some schools budgets may have

been reduced by more than an average of 4%, but, as we've made clear, no school is enduring a budget cut of more than an average of 4%. It's important to understand that any school that has a larger reduction also has a much smaller student population this year compared to last year—and doesn't need as much money to educate its students.

In New York City public schools, funding follows the students. 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 we had a budget surplus, a school with declining student enrollment would have received fewer resources for the coming school year.

Since the 2005-2006 school year, Columbus has experienced a register decrease of nearly 1,000 students. As a result of this drop, the school's budget has been reduced accordingly—schools need fewer dollars to educate fewer students. Like all schools, Columbus has endured several rounds of budget reductions since the 2008-2009 school year. However, the school's budget has not been reduced disproportionately compared to other schools.

Comments 8, 9(b), (c), (g), 23(a), 23(j), 23(k) and 23(n, iii) are related to the support and resources offered to Columbus. All schools receive support and assistance from their superintendent and Children First Network (“CFN”) team, a group of educators who work directly with schools. This team helps schools identify best practices, target strategies for specific students in need of extra help, and prioritize competing demands on resources and time. Each school community chooses the network whose support best meets its needs, and each network works to improve student achievement in all of its schools. New Visions, through CFN 562, has provided the “Datacation” program free of charge to the school beginning in July 2010. This has an online grading system, parent link, programming information, credit accumulation and regents passes information, as well as anecdotal information. New Visions also provided a library specialist who convened meetings of the librarians across other schools supported by New Visions to assist in purchasing appropriate books, reading programs, and sharing of best practices among the librarians. Additionally, New Visions held a series of 5 grant writing workshops. Over the previous years, the DOE has offered numerous supports to Columbus including:

Leadership Support:

- Supporting the principal in developing the school's Comprehensive Education Plan and in setting school goals.
- Providing extensive leadership training for the principal.
- Connecting administrators with other schools to learn effective practices that could be replicated at Columbus.

Instructional Support:

- Providing monthly training to teachers on individualizing instruction, curriculum development, aligning instruction to new State standards, improving classroom instruction by using productive group work, and data analysis.
- Establishing grade-level and departmental teams to analyze student data and monitor student progress and to use data to make instructional decisions, improve credit accumulation, and increase the pass rate for Regents exams.

- Helping to implement extended periods and block scheduling for the ninth-grade Global Studies program.
- Supporting the school to use data to improve instruction for ELLs, students with disabilities, and students performing below grade level.

Operational Support:

- Working with the school to implement more than \$250,000 in grants, which was used to create alternative education programs for at-risk students (Renaissance Program, Boys 2 Men, and Women Empowerment), small learning communities (from High Schools that Work), and improve the campus library.
- Guidance on how to work with other schools on the campus to ensure efficient and coordinated use of facilities and shared spaces.
- Coaching on budgeting, human resources, recruiting and retaining talented teachers, and compliance issues.

Student Support:

- Training for guidance counselors on how to use scholarship reports and graduation tracking systems.
- Supporting partnerships with community-based organizations such as Good Shepherd Services and SoBRO (South Bronx Overall Economic Development Services).
- Creating a designated attendance team, crisis management team, and mediation program to help reduce suspensions and violent incidences at the school and improve student attendance.

Given Columbus' lack of success despite the above efforts—whether as part of a centralized effort to support all schools or individualized plans for Columbus—it is apparent that Columbus has failed to develop the proper infrastructure to meet the needs of its students and families.

Comments 9(a), (k) and 23 (e) concern the students to be served and the programming to be provided by 11X508 and other new schools in building X415. Admission to 11X508 would be open to any New York City student through the High School Admissions Process. The school is proposed to have a Limited Unscreened admissions method, and will offer priority to Bronx residents and students. Limited Unscreened schools give admissions priority to students who demonstrate interest in the school by attending an Information Session, Open House events, or visiting the school's exhibit at any one of the High School Fairs. The specific academic programming to be offered by 11X508 has not yet been determined. There is a New Schools Fair on February 12 and 13, 2011 where students can learn more about New Schools opening up across the City. In regards to other new schools opening in the building in the future, the DOE will continue to assess available space and need for seats to determine if an additional new school would be appropriate at X415.

Non-District 75 high school students with IEPs are admitted in the same manner as general education students. Schools are expected to create programs that meet the needs of all students ensuring the greater exposure to a general education curriculum. Therefore, placement for

students with IEPs is the same process as that for general education students. 11X508 will provide all mandated services for ELL students and students with IEPs.

Comment 9(a) concerns where students who need additional services will attend high school if Columbus is phased out. If this proposal is approved, Columbus would phase out gradually, but the ninth-grade seats lost as a result of that phase-out would be replaced as new schools phase in to the Columbus High School Campus. As discussed in separate EISs posted on December 20, 2010 and amended on January 27, 2011, the DOE has also proposed to phase-out Global Enterprise and co-locate a new high school, 11X509, in X415. The approximately 223 9th grade seats that would be lost by the phase-out of Columbus and Global Enterprise would be recovered through the 200-250 9th grade seats offered by 11X508 and 11X509 in 2011-2012 if all four proposals were approved.

The high schools located in X415 serve general education students and students requiring special education services, including students currently enrolled Collaborative Team Teaching (“CTT”) and Self Contained (“SC”) classes and students receiving Special Education Teacher Support Services (“SETSS”). Upon admission, the schools work with parents to develop an individualized program that reflects the resources that the schools can offer as appropriate for the student. Thus, services are tailored to meet the individual needs of the students with disabilities currently enrolled and, as such, may vary from year to year. In addition, students classified as English language learners (“ELL”) are enrolled and receiving English as a Second Language (“ESL”) or transitional Bilingual services. Global Enterprise is the only school in X415 that currently offers a transitional Bilingual program in Spanish. All students enrolled in one of the schools on the Columbus High School Campus, and those students who continue to be enrolled at Columbus during the phase out will continue to receive their mandated special education and/or ESL services if this proposal is approved. In addition, 11X509 will be dedicated to serving English Language Learners students who have been in the country for less than four years.

With respect to the phase-out of P010X@Columbus, there are 8 District 75 inclusion program sites at other high schools in the Bronx. Please see p. 18 of the EIS describing the proposed phase-out of Columbus for more details.

Comment 9(d) concerns the composition of the PEP. The PEP consists of 13 appointed members and the Chancellor. Each borough president appoints one member and the mayor appoints the remaining eight. The Chancellor serves as an ex-officio non-voting member. The PEP is responsible for electing a chairperson from among the voting members. To learn more about the individual members of the PEP, please visit:

<http://schools.nyc.gov/AboutUs/leadership/PEP/members/default.htm>

To access the Bylaws of the Panel for Educational Policy:

<http://schools.nyc.gov/NR/rdonlyres/B432D059-6BFE-4198-8453-466FDE2B22D5/69835/PEPBylawsFinal91409.pdf>

Comments 9(f), 23 (i) , 23(n, i) and 26 (f) concern the demand for seats at Columbus. Demand for seats at Columbus is low. Columbus is a zoned high school. In 2009-2010 only 11% of

incoming ninth-grade students who resided within the zone were enrolled in Columbus as of October 31, 2009. This means that the vast majority of zoned ninth-grade students who were guaranteed a seat at Columbus chose to enroll elsewhere.

Columbus did receive approximately 1,355 applications for admission in September 2010. This number reflects applications received prior to the announcement by the DOE last winter regarding the proposal to phase-out Columbus. This is a reduction in the number of application received for admission in September 2009, when the school received 1,629 applications. These application figures include students who ranked the school as any one of the 12 choices on their High School Application. For September 2009, only 10% of students who ranked Columbus did so as the first choice on the application. Again, as a zoned school, only 11% of incoming ninth grade students who reside in the zone enrolled in Columbus.

Comments 1, 4, 6, 9(i), 23 (h) and 24 concern an alternative proposal to convert Columbus to a charter school rather than phase it out. The process for a school to become a charter school is as follows: a school submits an application to the NYC Department of Education Charter School Office. This office then reviews the application, and if the application demonstrates a strong capacity for operating a high quality charter school, the applicant would be invited to a panel interview. If approved, the City would recommend to the Board of Regents to grant the charter to the school. The proposal to convert a school to a charter must also be approved by a majority of the parents of students who currently attend the school. The DOE sent Columbus a charter application in January 2011. At this time, Columbus has not yet completed the charter application or returned it to the DOE Office of Charter Schools. If the PEP approves the phase-out proposal for Columbus, Columbus would still be eligible to convert to a charter as it phases out, if the charter application is approved.

However, as discussed in the EIS and in response to comments 2, 3, 4, 5, 10, 13, 14, 16, 18, 21, and 23(g), the DOE feels that phasing out the school, rather than converting it to a charter school, best serves the community.

Comment 9(m) questions whether the State allows a Turnaround school to be phased-out. Phase-out is one of the two possible interventions that fall under the Turnaround intervention.

Comments 9(j), (v), and (w) concern the availability of space in X415. As described in more detail in pages 18-24 of the EIS describing the proposed phase-out of Columbus, there would be sufficient space in the building to accommodate all students pursuant to the Citywide Instructional Footprint (the "Footprint") if Columbus and/or Global Enterprise are approved for phase-out and 11X508 and/or 11X509 are approved for phase-in. Please visit the DOE Website to access the Footprint, which guides space allocation and use in City schools, at: http://schools.nyc.gov/NR/rdonlyres/8CF30F41-DE25-4C30-92DE-731949919FC3/87633/NYCDOE_Instructional_Footprint_Final9210TNT.pdf.

The Footprint sets forth the baseline number of rooms that should be allocated to a school based on the grade levels served by the school and number of classes per grade. For existing schools, the Footprint is applied to the current number of classes and class size a school has programmed and is confirmed by a walk-through of the building by the Borough Director of Space Planning

and the school's principal. Columbus High School is currently using 29 full-size spaces, 1 full-size science laboratory, 3 full-size science demonstration rooms, and 12 half-size spaces. Under the Footprint, Columbus should be allocated a baseline of 38 full-size spaces, 3 half-size spaces, 2 science labs, and 2 science demonstration rooms. Although it may initially appear as if Columbus is operating 11 full size rooms under its baseline allocation, in fact, Columbus is using the appropriate number of rooms to serve its particular population of students. The Footprint allocation for Columbus does not differentiate between general education or Collaborative Team Teaching classes (which require full-size classrooms) and Self Contained ("SC") classes (which can be accommodated in half size classrooms). Columbus is currently operating 11 SC classes which may be programmed in half-size classrooms, depending upon availability of full-size classrooms. Therefore, Columbus has been allocated 12 half size classrooms—9 half size classrooms above its baseline allocation—to accommodate its SC instructional needs. In addition, Columbus has access to the 5 shared full-size spaces on the campus, which provides additional programming flexibility. There are also 10 science demonstration rooms in the building, therefore there are sufficient science spaces on the campus to be programmed for use among the schools.

For more detailed information concerning the allocation of space during as schools phase-out and phase-in at X415, please see pages 19-25 of the EIS describing the proposed phase-out of Columbus.

Comments 9(h) and 23 (m) concern a parent meeting held on November 18, 2010. The DOE did not record this meeting, therefore there is no transcript to provide. The transcript of the joint public hearing, however, can be found on the DOE website at the following link: <http://schools.nyc.gov/community/planning/changes/bronx/Columbus>

With respect to comment 23(m), the EIS acknowledges that during the engagement process many members of the Columbus community objected to the possibility of phasing-out the school.

Comments 9(k) and 9(x) concern plans to co-locate one or more new schools in X415. Currently there are no plans to co-locate a charter school in the X415 building. The DOE has proposed to phase in a new district school, 11X508, to replace the seats lost at Columbus. In addition, as discussed earlier, the DOE has separately proposed to phase out Global Enterprise in the X415 building and to replace seats lost at Global with another new district school, 11X509, which will be dedicated to serving English Language Learner students who have been in the country for less than four years.

Comments 9(n) and (s) concern Over-the-Counter ("OTC") students. The DOE will only send on-track upper-term students to schools that are phasing out. Students who have a right of return, regardless of any other factor, may also return to a phasing out school.

Over-the-counter placement is a term that refers to the method of enrolling students who need a school assignment because they were not part of any admissions process for entry grades and/or were not enrolled in a NYC school at the time school started. These students fall into one of four

categories:

- New to the New York City school system; or
- Left the New York City school system and have returned; or
- Are seeking transfers (based on the guidelines outlined in Chancellor's Regulation A-101).¹
- Did not submit a high school application.

When a student arrives for an over-the-counter placement, his or her school assignment is determined by his or her interest, home address and which schools have available seats, and where applicable, transfer guidelines. The student visits a Borough Enrollment Office where he or she meets with a counselor who reviews options that would meet the student's needs.

OTC students will continue to be served by one of the 481 schools that admit students over-the-counter during the peak enrollment period. Moreover, in the Bronx, the number of schools that admit over-the-counter students during this period has increased from 123 to 128.

Comment 9(r) concerns admission to zoned schools. Students who list their zoned school on their high school admissions application are guaranteed admission to either the zoned school or a school that they have ranked with greater preference than the zoned school on the application. Last year, the Panel for Education Policy approved the phase-out of 14 high schools, including Columbus. A lawsuit prevented the DOE from following through on those plans. After the lawsuit, Chancellor Klein sent a letter home to families who applied to one of the 14 high schools proposed to phase-out last year indicating that the DOE had proposed the school for phase-out and expressing his concern that the school was not set up for success. Students who matched to a phase-out school last year received two matches during the High School Admissions Process, one to one of the 14 proposed phase-outs and one to a non-proposed phase-out. Students were able to choose either option.

¹ Per Chancellor's Regulation A-101, students have the "right to return" to their prior school following discharge within one calendar year of discharge, subject to available seats. Therefore, it is possible that non-zoned students arriving for an OTC placement may be granted admission to a zoned school.

Comment 9(o) concerns the supports that will be available to Columbus during the course of the phase-out. During the proposed phase out, the DOE will build on our past efforts to help the school by:

- Providing teacher training around issues including curriculum planning, improving teaching practices, and tailoring instruction to individual student needs.
- Fostering opportunities for teachers and administrators to connect with colleagues in other more successful schools, allowing them to learn from one another, improve teaching, and better support students.
- Facilitating partnerships with community-based organizations to support youth development initiatives at the school.

For information concerning the supports the DOE has offered in the past, please see the response to comments 7, 8, 9(g) and 11.

Comment 9(t) concerns enrollment data. The data cited in the EIS includes the total number of students who were new admits on the audited register on October 31, 2010. There were in fact 67 new 9th grade students who enrolled in Columbus through the High School Admissions Process and 94 new 9th grade students that enrolled in Columbus through the “Over-the-Counter” process for the audited register on October 31, 2010. The 207 OTC students cited in the EIS are students in grades 9-12 (94 in grade 9; 113 in grades 10-12) that were enrolled on the audited October 31, 2010 register.

Comments 9(p), 22 and 23 (l) concern the impact of the proposal on Columbus’ partnerships with CBOs. Columbus has developed a number of partnerships with community based organizations.

Those partnerships would continue to support current students as Columbus phases out though it is possible that the nature and scope of those partnerships would change based on shifting need and resource availability as the school moves toward closure. The DOE would work with Columbus staff to enhance existing partnerships or develop new partnerships as the school phases out if specific, new student needs emerge during the phase-out period. In addition, the DOE would work with other school organizations in the building to foster opportunities for them to work with the community organizations that have supported Columbus students in the past. The other schools currently housed on the Columbus High School Campus already have established relationships with non-profit organizations, including some whose work is directly connected to the missions and themes of those schools. As appropriate, the DOE would work with other schools on the Columbus High School Campus to introduce or enhance partnerships with the community organizations that currently support Columbus students. The DOE is not currently aware of any plans to sever the relationship between the Hebrew Home for the Aged and Columbus.

Comments 9(q) and (u) concern the availability of CTE programming. Students participating in Columbus’ three CTE programs would continue to have access to necessary classes to support them as they work to meet graduation requirements and earn their high school diplomas. There are 7 other CTE programs in the Maintenance, Installation and Repair pathway Citywide,

including 2 in the Bronx. There are 10 other CTE programs in the Restaurants and Food/Beverage Services pathway Citywide, including 1 in the Bronx. The list of schools in the City that also provide a CTE pathway in Maintenance, Installation and Repair and Restaurants and Food/Beverage Services can be found in Appendix A to the EIS describing the proposed phase-out of Columbus. A full list of City high schools with more detailed information is available in the New York City High School Directory, which is available in print at DOE middle schools and Borough Enrollment Offices or on the DOE Website at: <http://schools.nyc.gov/ChoicesEnrollment/High/Directory/default.htm>

Comment 9(z) concerns the excessing of Columbus staff members. All excessing would be conducted in accordance with existing labor contracts. For example, the current United Federation of Teachers (UFT) contract would require excessing to take place in reverse seniority order within each given teaching license area.

Comment 13 concerns the supportive learning community students feel Columbus offers. We acknowledge the hard work and dedication of the teaching staff and administration. However, given Columbus' lack of success despite the above supports – whether as part of a centralized effort to support all schools or individualized plans for Columbus – it is apparent that the school has failed to develop the proper infrastructure to meet the needs of its students and families.

Comment 14 concerns the planned renovation of the X415 library. The library and other building resources will still be available for use by current and future students as Columbus phases-out.

Comments 9(y) and 15 concern the impact of Columbus' phase-out on overcrowding at other schools. Because students are able to apply to high schools across the city through the High School Admissions Process, and because we know that high school students do exercise their choice to attend schools that most interest them and that these schools are not always geographically close to their home, the DOE assesses the need for seats at a borough level for high schools, rather than a district or individual building basis.

The DOE does not anticipate that Columbus' phase-out will lead to overcrowding at other schools. In the Bronx, there are 61,647 high school seats and 55,490 enrolled students. This implies that there is excess capacity of high school seats in the borough; however, utilization can vary by community and by building. This year, the DOE proposes to open seven new high schools in the Bronx in September 2011, including one new school as a replacement option for Columbus, which will provide additional seats to students in the borough. Some of these schools will open in campuses of the proposed phased-out schools while others will open in underutilized buildings. If approved by the PEP, these seven new schools are expected to serve approximately 830 new 9th grade students in 2011-2012.

Information regarding the new schools that will be proposed to open in 2011 will be provided in the winter for students who may be interested in applying to the schools as part of the High Schools Admissions Process. The details of this process are discussed in the EIS on pages 12-16. Detailed information about all City high schools is published annually in the City's High School Directory, available in print at DOE middle schools and Borough Enrollment Offices or on the DOE website here: <http://schools.nyc.gov/ChoicesEnrollment/High/Directory/default.htm>

Comment 17 concerns Columbus' track record for graduating "failing" students. However, Columbus' four-year graduation rate has remained below 50% for several years.

- In 2009-2010, the school's four-year graduation rate (including August graduates) was 47%, well below the Citywide 63% average. This graduation rate does represent an increase from the 40% graduation rate in 2008-2009. However, the improvement is not significant enough to demonstrate that the school is capable of quickly turning around. Specifically, the 47% graduation rate ranks in the bottom 6% of high schools Citywide and in the bottom 7% of high schools in the Bronx in terms of graduation rate.
- If Regents diplomas alone counted toward graduation—as will be the case in just one year—the four-year graduation rate at Columbus would drop to just 25%, well below the Citywide Regents' graduation rate of 46%.
- The school's six-year graduation rate is not much better. In 2010, Columbus achieved a 51% six-year graduation rate, still below the Citywide four-year average.
- In 2009-2010, only 57% of first-year students at Columbus earned at least 10 credits. Credit accumulation in the first year is a key predictor of future student success because students who fall behind early often have trouble getting back on track to graduation. High school students are required to earn at least 44 credits (in addition to requirements related to the Regents exams).

Please also see the response to comments 7, 9(e) and 11 above.

Comment 18 concerns school safety procedures. If a student is not comfortable with certain safety procedures or feels like an incident has been handled inappropriately, they are encouraged to reach out to the principal, another responsible adult in the building, 311, or the Office of School Safety to report the incident.

In response to comments 23 (f, i,ii,ii,iv)) and 23 (n, ii), the DOE has been working tirelessly for four-plus years to refine the evaluation of schools, and we believe we are evaluating schools at the bottom of the peer index list as fairly as possible. Columbus is compared only to the other high schools in the City that serve the most challenging students, and its results do not compare favorably.

Comment 23(f)(i-iv)'s contention that Columbus is unfairly disadvantaged is not valid. No statistically valid conclusion can be garnered from seven data points, as the commenter purports to do. There are many schools with peer indices in between those selected for the analysis, and including them would show that there is essentially no relationship between peer index and overall score.

Furthermore, while the peer index is clearly important, we have made a number of other adjustments over the years to make the Progress Reports as fair as possible to schools that serve challenging students (many of which have been influenced by suggestions from this commenter), including:

- Adjustments to the Weighted Diploma Rate for Special Education and over-age students

- Removing New York State Alternative Assessment students from the credits and average completion rate measures
- Using demographics to establish "decile" weights for students without 8th grade test scores
- Modifying the additional credit measures to put more focus on Special Education students

Finally, the Progress Reports, while an important component of the decision to phase out Columbus, are just one of many sources of information that factored into the decision. The DOE also considered Quality Review results, demand and enrollment statistics, and input from the network, superintendent, and the school community in making the decision. Another critical consideration is the fact that the State Education Department identified Columbus as Persistently Lowest Achieving for two years in a row.

In response to the statement that Columbus is not a median school in a group of peers, although Columbus has one of the lowest peer indices among high schools in the City, it is not the lowest. There are three schools with lower peer indices than Columbus (representing a more challenging population). Those schools did not receive overall scores and grades in 2009-10, but they are included in Columbus's peer group, and Columbus is compared to them on the metrics for which they have results.

Moreover, the 20 schools in Columbus's peer group with higher peer indices than Columbus all serve very similar populations of students. No school in Columbus's peer group has a peer index greater than 1.88. Ten of Columbus's peer schools had peer indices of 1.71 or less. Of those ten schools, seven have a 4-year graduating cohort – and all but two of the schools have higher 4-year graduation rates than Columbus.

In response to the statement that the peer group is neither statistically nor practically a peer group, the commenter uses a selection of other schools' Progress Report modelers to derive a "best fit line" of Progress Report scores by peer index, to suggest that Columbus receives an unfairly low score because of its peer index. However, the analysis is flawed in that it includes only seven schools. This sample is far too small to produce a statistically valid conclusion. There are many combinations of peer index and score between these points that are left out, and the number of schools between points varies dramatically. For example, between Columbus's peer index of 1.62 and the next highest peer index included, 1.89, there are 20 schools, each with a slightly different peer group. Between 1.99 and 2.17, there are 50 schools, each with a slightly different peer group. Including all of these schools would show that there is essentially no relationship between peer index and overall score.

The commenter also states that the lowest 3rd of students include almost a third with chronic 8th grade attendance – a major contributing factor to failure – and are traveling long distances to school. In response, in establishing the criteria for peer index, we evaluated a variety of pre-high school and demographic characteristics using regression analysis, including 8th grade attendance. The reason we did not include 8th grade attendance in the peer index is because it

was not found to be a significant factor in that analysis. This is not because 8th grade attendance does not matter – rather, it is because 8th grade attendance is highly correlated with the other characteristics included in the peer index, such that looking at 8th grade attendance in addition to those factors does not explain any additional variation in high school outcomes.

The commenter also states that students without 8th grade scores have very low decile weightings – and that’s 30% of our population! In response, the weighed Regents pass rate decile weights for a student without 8th grade test scores are based the historical performance of students with the same combination of the following characteristics: black or Hispanic, entitled to free lunch, English Language Learner, Special Education status, or Student with Interrupted Formal Education. The commenter is correct that the weighed Regents pass rate decile weights for students with the lowest 8th grade test results are greater than the highest weights for students without 8th grade test scores. However, to suggest that the decile weights should be as high is to assume that the students without 8th grade test scores all have low proficiency, which is not the case – many of our high school students attended middle school outside New York, and therefore do not have 8th grade test results; they have a range of incoming proficiencies.

With respect to the statement that extra credit categories are not filtered through the Peer Index, the additional credit measures focus on the most challenging student populations – students with Special Education designations, English Language Learners, and students who are in the lowest third citywide (not in the school) in terms of 8th grade proficiency. Although the peer index is not used to evaluate the additional credit metrics, schools are only compared on the basis of their results with these challenging students. Furthermore, the majority of the additional credit points are based on the weighted diploma rate, which gives additional weight to the graduation outcomes of students with special education status or who enter high school overage.

With respect to comment 25, the central goal of the Children First reforms is to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school – led by a dedicated leader with a vision for student success. To ensure that as many students as possible have access to the best possible education, since 2003 New York City has replaced 91 of our lowest-performing schools with better options and opened 474 new schools: 365 district schools and 109 public charter schools. As a result, we’ve created more high-quality choices for families.

Based on feedback from communities in 2009 and 2010, the DOE made improvements to its timeline and process for communicating with schools and families early and often throughout the investigation and decision making process. This year, we talked to school leadership, parents, SLTs, CECs, elected officials, and local CBOs about our ideas about how to improve struggling schools. We convened these meetings to discuss our proposals and to hear feedback and new ideas.

The Department developed and distributed “Fact Sheets” for each school we talked with. These fact sheets described proposals, the rationale behind them, included relevant data, and provided

clear instructions for how to offer feedback. They were posted on our website and distributed at meetings.

When we announced the Department's recommendation to propose the school for phase out, dedicated teams of educators and engagement specialists spent several days back in these schools meeting with teachers, parents, and students.

In January, Joint Public Hearings were held for all proposals and public feedback was collected at these meetings and through dedicated email and phone numbers. The Department's analysis of public comment is contained in this document.

With regard to comment 26 (a,b,c,and d), the DOE has found that across schools that have been closed in New York City, the graduation rate for the cohort before the phase-out process begins is on average 37.3% whereas the graduation rate for the last cohort prior to closure actually increases to an average of 56%.² The DOE acknowledges, however, that the drop out rate for schools that have closed does rise slightly from 23.7% to 29.5% over the same time period. The discharge rate at schools over the same time period also rises slightly from 29.8% to 33.2%.

With regard to comment 26(e), the Independent Budget Office ("IBO") report that is referenced notes two major points.

1. The schools that we are proposing for phase out are among the lowest-performing in the entire City
2. Those schools generally serve students with greater needs than the average school citywide.

The IBO's analysis compares these struggling schools to the average school citywide. When the DOE assesses the performance of schools however, we compare them to other schools that serve similar populations. This is how the Progress Report is structured. Please see the response to comments 7, 9(e), 12, 17, 23(b) and 23(c) for more information concerning the performance of schools with high need populations comparable to Columbus.

Many of the reform efforts under this administration have focused intensely on students with the greatest needs.

Changes Made to the Proposal

No changes were made to the proposal.

² NYC traditional calculation includes Local and Regents Diplomas, GEDs, Special Education diplomas, and August graduates. It does not include disabled students in self-contained classrooms or District 75 students.