



## Public Comment Analysis

Date: February 2, 2011

Topic: The Proposed Phase-out of Jamaica High School (28Q470)

Date of Panel Vote: February 3, 2011

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### Summary of Proposal

Jamaica High School (28Q470, “Jamaica”) is located in school building Q470 (“Q470” or the “Jamaica Campus”) located at 167-01 Gothic Drive, Jamaica, NY 11432, within the geographical confines of Community School District 28 (“District 28”). It currently serves students in grades nine through twelve. The New York City Department of Education (“DOE”) is proposing to phase out Jamaica based on its poor performance and the DOE’s assessment that the school lacks the capacity to turn around quickly to better support student needs.

If the proposal to phase out Jamaica is approved, Jamaica would no longer admit new ninth-grade students after the conclusion of the 2010-2011 school year. Jamaica’s enrollment would decrease gradually over the next three years and would complete phasing out in June 2014. Current students would be supported as they progress towards graduation while remaining enrolled in Jamaica. In cases where students do not complete graduation requirements by the closure date (June 2014), the DOE will help students and families identify alternative programs or schools that meet students’ needs so that they may continue their high school education after Jamaica completes phasing out.

Jamaica is currently co-located with Queens Collegiate: A College Board School (28Q310, “Queens Collegiate”), Hillside Arts and Letters Academy, (28Q325, “Hillside Academy”), and High School for Community Leadership (28Q328, “Community Leadership”). With the exception of Jamaica, all schools on the Jamaica Campus are still in the process of phasing in. Hillside Academy and Community Leadership currently serve ninth-grade students and will continue to grow to full scale until they reach their complete grade span of 9-12 in 2013-2014 school year. Queens Collegiate currently enrolls students in sixth grade, and grades 9-11. Queens Collegiate will continue to expand until it reaches its complete grade span of 6-12 in the 2012-2013 school year.

In 2009-2010, building Q470 had a target capacity of 2,116 students, and the building enrolled 1,574 students, with a target utilization rate of 77%. In 2010-2011, the four schools in the building are projected to enroll 1,586 students, yielding an estimated building utilization rate of 75% of target capacity. This means that the building is “under-utilized” and has extra space to

accommodate additional students. If the proposed phase-out of Jamaica is approved, there would be enough space in the building to open a new school on the Jamaica Campus in 2011-2012.

In a separate Educational Impact Statement (“EIS”) posted on December 20, 2010 and amended on January 19, 2011, the DOE has proposed to co-locate a new high school, 28Q350, on the Jamaica Campus beginning in September 2011. 28Q350, which is modeled on Jamaica’s Gateway Medical Science/Honors Institute, would offer a rigorous academic program and prepare students for post-secondary work in the sciences and medicine. If this co-location proposal is approved, 28Q350 would open in September 2011 in building Q470 serving students in grades 9-12 grade. This EIS can be accessed in the office of the impacted schools or on the DOE’s website at <http://schools.nyc.gov/community/planning/changes/queens/Jamaica>.

### **Summary of Comments Received at the Joint Public Hearing**

A joint public hearing regarding this proposal was held at Q470 on January 20, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 240 members of the public attended the hearing, and 48 people spoke. Present at the meeting were: Queens High School Superintendent Juan Mendez; Jamaica’s School Leadership Team (“SLT”) representatives Danesa Thompson, Charm Rhoomes, Shelley Harrington, and Kevin Gonzalez; United Federation of Teachers (“UFT”) Chapter Leaders for Jamaica Debbie Saal and James Eterno; Community Leadership’s SLC representative Shelley Harrington; Queens Collegiate’s SLT representative Charlene Wingate; Hillside Academy’s SLT representative Bethany Trust; Community Education Council (“CEC”) President for District 28 Joseph Trotti; Citywide Council on High Schools (“CCHS”) members Monica Ayuso and Sandra Kryshundayal; New York State Assembly member David Weprin; New York State Senator Tony Avella; and Deputy Chancellor John White.

#### **The following comments and remarks were made at the joint public hearing:**

1. James Eterno, Jamaica’s SLT member, stated that Superintendent Juan Mendez and Deputy Chancellor John White did not bring actual data. Jamaica has seen steady increases in the graduation rate up from 38% to 58% and a 14% increase in Regents diplomas. This is something to be proud of, not a phony scam. A Jamaica diploma is real and good. Though the DOE calls us Persistently Lowest Achieving, our gains are the same as the City’s gains. The school is given more English Language Learners and special education students than the Citywide average. Without adequate resources—DOE gutted our after school programs and forced the school to excess staff upon a decrease in enrollment—the school should not be expected to succeed, but it has still improved. Other schools in the building are given better resources and have better teacher-student ratios. Other schools in the building also refuse non-traditional or high-needs students, but Jamaica welcomes them and pays for it. The DOE should take into account SAT and AP scores in its grading, as Jamaica shows impressive numbers on those tests.
2. Kevin Gonzalez, Jamaica’s SLT member, said the school has been affected by the phase-out through cuts in resources, teachers, and programs. Nonetheless, the new

schools in the building got new supplies/facilities, and they brought in new metal detectors. Without equal treatment how are they supposed to excel? Jamaica students need to be privy to the same school resources that the new schools in the building are getting.

3. Debbie Saal, UFT Chapter leader, said the data in the proposal is wrong, and when the DOE deemed the school failing it inhibited attendees. Students who did want to come were instead drawn to the other new schools in the Jamaica building. A lack of technological equipment inhibits performance.
4. Charm Rhoomes, Jamaica's SLT member, said there is a deficit of equipment in the building and science classes have been cut from five to four periods. She asked about how the school is supposed to succeed without adequate resources from the DOE. The Gateway and peer tutoring programs have been eliminated, and electives which fostered student growth were cut.
5. Charlene Wingate, Queens Collegiate's SLT member, said that in defending Jamaica, there are many myths about Queens Collegiate that people have been saying, including that the school has better access to resources and a student population with fewer ELLs and special education students.
6. Monica Ayuso, CCHS member, said the school's fate was determined by the PEP vote, a long time ago, to phase out the school. The quality of life at Jamaica deteriorated because they didn't receive enough students. They didn't get any PLA resources or a superintendent. They've had five superintendents in many months and no more AP classes are offered. There is no real "joint" collaboration on the proposal.
7. State Senator Tony Avella said it is a disgrace that people have to sign-up by 6:30 p.m. if they want to speak. If that is a Citywide policy, it needs to be changed. Data is manufactured in the proposal to make the school look bad. The DOE created this situation and should be sued for discrimination because of an unequal divvying of resources. The DOE faces a big fight over the proposal.
8. Assembly member David Weprin said closing Jamaica violates the spirit of educational equality, and closing Jamaica is hazardous because of overcrowding in the schools. Jamaica should stay open. He has family connections to the school.
9. Multiple commenters said no resources, help, or support has been given by the DOE.
10. A commenter said a significant percentage of ELLs passed portions of the exam.
11. A commenter said the lack of resources and unfair circumstances are counter to the idea of a democracy.
12. Multiple commenters said the DOE's support for closing the school is flawed, stating that facts are wrong or that the efforts of teachers and staff are unrecognized.
13. Multiple commenters said the DOE is only pretending to listen this year because of the lawsuit.
14. A commenter said she was concerned, as a Junior at Jamaica, about where she will get her recommendations for college with a college office that is always so crowded.
15. Multiple commenters said the DOE does not listen to parents, students, or the community.
16. Multiple commenters said small schools are treated better than large schools.
17. Multiple commenters said the school isn't dangerous.
18. A commenter said students who don't graduate on time should sue the High School Superintendent Juan Mendez and Deputy Chancellor John White.

19. A commenter stated that miscalculation of the school's progress report by a mere two points would mean they could have a C and the phase-out wouldn't be happening.
20. Multiple commenters said the school has outdated facilities/equipment and a lack of technological improvements and resources.
21. Multiple commenters referenced past personal or family experience with the school and satisfaction with the school as a reason to keep it open.
22. Multiple commenters stated that Jamaica is treated unfairly compared to other schools in the City and that the DOE has been removing programs over the years, slowly killing schools.
23. A commenter said students don't have a normal lunch period.
24. Multiple commenters said families, including immigrant families, will have to be separated due to the closing and will have to travel far away to other schools.
25. A commenter called for unity and a recognition of all people, which the commenter felt were not being accomplished by the phase-out proposal.
26. Multiple commenters said the classes are overcrowded.
27. A commenter indicated a feeling that the DOE does not care about Jamaica.
28. A commenter praised the International Club at Jamaica.
29. Multiple commenters said cheating does not take place in Jamaica.
30. Multiple commenters stated that benefits provided to immigrant and international students by the school would be lost if it is phased out.
31. A commenter said the school has a great music class.
32. Multiple commenters said they learned to speak English at the school.
33. Multiple commenters said the DOE should observe what teachers actually do.
34. Multiple commenters said the DOE should reconsider the proposal to close the school.
35. Multiple commenters said the failure is on the part of the DOE.
36. A commenter stated most of the students here come from single parent households who try as hard as possible to keep their kids in school.
37. Multiple commenters said the DOE is trying to privatize the system and transform itself into a business model by closing schools and opening new charter schools, which should not be done.
38. A commenter said the DOE fires staff with the most experience because they are too expensive.
39. A commenter said the phase-out will lead to more drop-outs.
40. A commenter said the five-year graduation rate should be applauded.
41. Multiple commenters said the school is given more than its share of special education students and ELLs.
42. Multiple commenters said funds should be diverted from other allocations to save Jamaica, like the salary of the Deputy Chancellor.
43. A commenter asked for an explanation of why the school is being shut down.
44. A commenter said Jamaica is at a disadvantage because it does not have restrictive admission policies whereas many other schools do.
45. A commenter said the phase-out is a part of Mayor Michael Bloomberg's plan to create vast private wealth.
46. A commenter said Jamaica has the necessary components to thrive, but it just needs resources invested.

47. A commenter said phase-outs and opening new schools in their place are a waste of taxpayer money.
48. A commenter said the DOE discouraged people from enrolling in the school.
49. A commenter said statistics show a rise in applications to the school for 2009-2010.
50. A commenter said teachers were forced out of the school by excessing.
51. Multiple commenters said the school has a long legacy which should be preserved.
52. Multiple attendees asked why money is spent on new schools when it could be spent on fixing existing schools.
53. An attendee asked why the DOE is closing the school when everyone in the surrounding community does not want it to be closed.
54. Multiple attendees asked why other schools in the building have privileges not afforded to Jamaica students, specifically citing how students of other schools could participate in Jamaica's sports teams, walk unrestricted in Jamaica's hallways, and use Jamaica's equipment and locker rooms, while Jamaica students are not allowed to do the same with regard to other schools, and citing how Jamaica's music room was reallocated to Queens Collegiate.
55. An attendee asked what the budget deficit is for the school.
56. An attendee asked how closing the school helps students.
57. Multiple attendees asked if there would be fights among schools with multiple schools in the building.

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

58. A commenter said the appointment of a Chancellor without any experience is an insult to the students, and the Chancellor doesn't know a student from a condom.
59. An attendee submitted a written question which was illegible.

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

60. James Eterno, Jamaica's School Leadership Team member, commented in response to the Fact Sheet published by the DOE on November 28, 2010. <sup>1</sup>He states that there was never a quorum at the School Leadership Team pre-engagement meeting on November 17, 2010 and it was unofficial as teachers and students did not attend.

The DOE has significantly undercounted Jamaica's graduation rate for two years in a row. The State's data, which he believes are more reliable, are different from the City numbers. Between 2005 and 2007 the graduation rate skyrocketed to 52%; however, the DOE removed the principal following the bump. In 2008, the school was mislabeled a Persistently Dangerous School and an Impact School, but the graduation rate still went up to 53% and last year it went up again to 54%. He says 54% is lower than the real number because students who should not be in the 2009 cohort are counted which puts the real number closer to 57%. Even so, data show a 16% improvement in our graduation rate

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<sup>1</sup> This comment was received after the DOE published a Fact Sheet concerning Jamaica High School, prior to the comment period on this proposal. Although this comment was not received during the comment period, as a courtesy, the DOE wishes to acknowledge it and has provided a response below.

over four years. This figure is better than the 14% increase in the Citywide graduation rate during the same period of time. This increase took place even though the DOE reduced teaching and guidance staff to nearly half and got rid of the majority of secretarial and paraprofessional staff. These cuts in staff outpaced the decrease in student population, which he feels is success.

Additionally, Jamaica's increase on the National Assessment in Education Progress was slightly greater than the City's, and while the City touted their progress as success, Jamaica's is labeled failure. All of this improvement also was done with a significantly higher than average proportion of English Language Learners. Jamaica has added value and moved steadily upward, all while being provided inadequate resources.

Jamaica's progress report grade is questionable because it does not give additional credits for moving the most challenging students ahead. In 2010, Jamaica graduated 11 English Language Learners and one "Most Restrictive Environment Special Education" student with a Regent's Diploma, which should have gone to the school's credit for the progress report score. Jamaica only needed two points to earn a higher progress report grade.

The graduation rate on the current progress report is based on cohort data that the DOE, in a footnote on page two, concedes are incorrect. The data were not updated with the State until after the progress report was finalized. Why would the DOE not change the progress report after the data were proved wrong?

The DOE should not hold students and teachers accountable to data that is incorrect because the principal did not meet an arbitrary deadline. Paired with the lack of additional credits for progress among the most challenging students, the use of incorrect data seems to indicate intentional actions by the DOE as part of a plan to close the school. After all, with correct data, Jamaica would be shown to be much closer to target for graduation. Mr. Eterno is happy to take a closer look at the data to provide a correct picture of the school.

The DOE has not provided real support to the school. Upon questioning by Mr. Eterno, no teachers in the school could remember any extensive teacher training around issues such as tailoring teaching to support individual student needs or targeted support to high-needs students, as the Fact Sheet states.

Instead, the DOE has only decreased the budget disproportionately to enrollment decline, increased class sizes, and downsized guidance, secretarial, and paraprofessional supports. Other statements about DOE support, like working with administrators to improve safety conditions and attendance are also incorrect. The people who work on attendance and pupil accounting are formally unqualified, which could have led to incorrect graduation data, among other problems. Finally, the community partnerships mentioned as support by the DOE only help a limited number of students.

Last year, the public made a strong showing of support for Jamaica, decrying closure and demanding proper resources, though this is not mentioned where the DOE says the school had been voted by the PEP last year to phase out.

Additionally, the State's label for the school as Persistently Lowest Achieving does not take into account the significant reduction in staff which was disproportionate to the decline in student enrollment. The label also does not take into account the miscalculation of the graduation rate. Moreover, the school met the State target for last year, but the rules were changed in the middle of the game.

The DOE relies on scant research for its recommendations for change. For example, Andrew Jackson High School in Queens was closed and broken into smaller schools. Now those smaller schools are struggling as they are the same at-risk population.

None of the DOE's supports include lowering class size, hiring new paraprofessionals for at-risk students, or reducing guidance and secretarial workloads. Studies from Tennessee and California show low class sizes improve student performance.

Mr. Eterno has a vision for the school that includes bringing back the Gateway and Finance Academy programs and partnering with the City University and other local universities, but the last two principals have not agreed.

The DOE's statement that it will support current students during the phase-out is not credible, seeing that the DOE has not supported students so far. Additionally, other schools would not be able to survive the loss of 30% teaching staff from one year to another, with a decline in student enrollment, loss of about half the school's space allocation, increase in class size above union contract levels, loss of popular electives and AP classes, use of unlicensed aides to perform secretarial duties, loss of a skilled Programmer and Guidance Coordinator, who were replaced by untrained assistant principals, who maintained all of their previous responsibilities. On top of that, other schools would not perform well if new schools were placed in the building with resources not available to that school, lower class sizes, and beautified spaces, while the original school's at-risk students are pushed into the middle of the building into obsolete rooms and have to eat lunch at very early or very late times. No school under these conditions could raise its graduation and promotion rates, much less thrive. Sending at-risk students to new schools that will eventually be subjected to these conditions won't solve problems. Keeping the at-risk students out of the new schools won't solve problems either.

Mr. Eterno and his colleagues want a new transformation program that allows teachers to run the school, like is happening in Los Angeles. The teachers are okay with being held accountable, but they would like to have say in the decisions made at the school

The DOE says better must be done for the students, but it is the DOE failing the students, and then complaining about their performance. Jamaica students are being treated like second-class citizens in the building.

Mr. Eterno and his colleagues suspect if they were permitted to look closely at the data, they could show how it is misleading, such as the Regents Diploma rate and Advanced Regents Diploma numbers. It has already been shown that the DOE uses incorrect data.

Students not gaining enough credits is the fault of the DOE because they have not permitted teachers to implement a mentoring program in which teachers each work with five ninth grade students to ensure their progress.

The Proficient ratings on the Quality Reviews would be higher if the school had more resources. In the 2008-09 review, Jamaica was cited for a lack of technology, even though the budget can barely afford chalk.

The attendance rate wouldn't be so bad if qualified people were doing the pupil accounting work, as the school did several years ago.

Though the school never was unsafe, it certainly is not unsafe now. The students are good people and problems are dealt with quickly. At a School Safety Committee Meeting, a police officer noted the undisciplined manner of students from another school in the building as they went to the lunchroom.

Jamaica's drop in enrollment is the fault of the DOE, the State, and the No Child Left Behind Law. Being on the State's Persistently Dangerous list and being labeled an Impact school have caused hundreds of students to transfer out of the school. This loss of students caused the school to lose a portion of its budget, which worsened the situation. By mislabeling the school, the DOE caused a deficit in the budget.

In spite of the budget deficit, the school improved its state graduation rate. The labels came as a result of the principal's reporting even slight incidents, upon recommendation by Joel Klein. The spike in reported incidents got the school in trouble with the DOE. The danger implied by the labels is never confirmed by teachers who come to Jamaica from elsewhere.

If the DOE allowed the school to market itself along with its partnerships with colleges, the decline in student demand would stop. The numbers of students making Jamaica their first choice are not significant because Queens Collegiate had even fewer students identify that school as their first choice.

The schools the DOE compares Jamaica to are not comparable schools. The percentages of Special Education and English Language Learners are not the same at all. One of the schools is much smaller than Jamaica and has a much better teacher student ratio. Another school is much larger and has a better budget for hiring personnel.

The school needs more staff and should be allowed to form strategic partnerships with universities. It needs modern equipment and real guidance counseling for the students. The pedagogical staff should be allowed to run the school, like in California. If they

can't fix it, then they should be held accountable. The school needs the transformation model and to be fixed. The DOE should be held to its own standards, and teachers should be given authority to make decisions about the school and the tools to do their job.

61. A commenter wrote that the school was destroyed by mass letters from the DOE calling the school a dangerous place. The DOE should send out letters recruiting students to preserve the legacy of Jamaica. Mayor Michael Bloomberg himself has pointed out a disparity in funding for students along racial lines. Jamaica is not a failing school despite mismanagement, and its Finance and Gateway programs, among others, have significantly contributed to the school. Schools Jamaica is compared have small learning communities, which Jamaica has applied to form but been rejected for a lack of funds, which the commenters believe is due to racism. All the schools in the building, along with the Gateway and Finance programs, should be brought under Jamaica's current principal as one school, though separate learning communities. Principal Acham has made the school better, but he has not been given enough time. The school's designation as a Persistently Dangerous school treated students unfairly on the basis of their race and their decision to petition the City for their school. The commenter would like to know the NAACP's and Alliance for Quality Education's positions on the commenter's questions. The commenter wants fair funding and better resources and wants Jamaica to expand enrollment to ease overcrowding in the area.
62. A commenter stated that Jamaica serves many at-risk students, and that it has been doing a good job teaching those with major challenges such as learning disabilities, limited knowledge of English, and difficult family circumstances. Sending these students to unfamiliar schools far from their homes will harm their chances of success.
63. The DOE received a Resolution from Queens Community Board 8 opposing the proposed phase-out of Jamaica, demanding that it be kept open and provided with equitable funding and support. It stated that:
  - a. The provision of free and quality education in community-based zoned schools is one of the fundamental responsibilities of the government.
  - b. It is essential that schools receive appropriate funding and support.
  - c. The small schools co-located with Jamaica have been provided with classroom and office space and prime use of shared resources such as lunch room space, as well as start-up funding which has allowed them to purchase smartboards and laptops and pay for public relations support.
  - d. The City based last year's phase-out proposal on faulty data and in so doing damaged the school's reputation; the City also discouraged students from applying to Jamaica and thus played a role in declining applications, which are being used to support this year's phase-out proposal.
  - e. Students at Jamaica have overcrowded classes while students in the small schools have low student-teacher ratios and access to counseling.
  - f. Jamaica accepts all students at any point in the academic year, while the small schools have a more restrictive admissions policy, as evidenced by their lack of Self-Contained special education students.

- g. Students denied seats at more selective small schools continue to be admitted to Jamaica, demonstrating that there is a need for open seats and for comprehensive high schools that serve all students.
64. Assembly member David Weprin wrote that he is in support of keeping it open. He stated, as an alumnus of the school, he is proud of the educational opportunities he received, and he believes the school would do well if it were given the resources to provide comprehensive community-based high school programs, it would do well. The DOE has treated the school unfairly compared to other schools in the building. It violates the spirit of equality in education. Considering overcrowding, this decision is haphazard. Closing Jamaica is not the answer, and the Assembly member offers his support and assistance in helping it stay open.
65. A commenter requested a no vote on the phase-out proposal because the school deserves support. Graduation rates have shown an upward trend. The school was rated undeveloped not because it doesn't serve populations whose success would give extra-credit on the report card, but because it fails to quantify how well the school does it. With such extra credit, the school's progress report score would be higher. The supports reported given by the DOE to the school seem gratuitous. The EIS fails to take into account the high number of applicants to thematic programs in the school, like the Law and Finance program, which exceeds the number of seats available in those programs. The City should increase the number of seats available in these programs. The low demand for seats is not an accurate indicator of the quality of the school because of negative media during the high school application period and letters from the DOE encouraging students not to attend Jamaica. The families still left at Jamaica are pleased with the education they are receiving. The low proportion of students from the school's zone who choose to attend the school does not mean they do not want to go there. It just means they chose to attend specialized or selective programs instead. Community members have asked that Gateway be expanded as a means of helping Jamaica. The EIS does not adequately detail the impact a phase-out would have on other schools, especially concerning overcrowding. The school should remain open until all of these things are resolved.
66. A commenter expressed opposition to the proposal on the basis that Appendix A of the EIS shows more applications were submitted to Jamaica's programs than seats were available in 2009-2010. The loss of seats caused by the phase-out is not justifiable in an already overcrowded borough. The schools suggested as alternatives to the Jamaica programs have very few seats available compared to applicants. Students need tutoring programs at their school, which Jamaica did not have only because of budget cuts. The EIS has not met the threshold required Education Law.
67. 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.

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

Comments 1, 3, 7, 12, 60, 63(d), 65 suggest that the graduation data the DOE uses in making phase-out decisions is not accurate: Every year the Department 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. The criteria by which the State designates schools as PLA are published on the following website:

<http://www.p12.nysed.gov/irs/accountability/LowAchieve/2009/Methodology-IdentifyingPersistentlyLowestAchieveSchools.html>. 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 the school, and whether more significant action is needed. We continue to consider performance data, school culture, and demand information. Deciding to phase out a school is the toughest decision we make. But it is the right thing to do for the students of New York City.

According to the Progress Report, Jamaica had 207 graduates in 2009-2010 (including August graduates) out of a cohort of 415 students, yielding a 50% graduation rate. In 2008-2009, Jamaica had 231 graduates out of a cohort of 500 students for a rate of 46%. Even when the State methodology is used to calculate Jamaica's graduation rate, the graduation rate in 2008-2009 was 53.5%. The Progress Report counted as graduates only those students who were discharged as of September 1, 2009, whereas the State counted graduates who were discharged up to September 30, 2009. The number of graduates discharged at Jamaica following the Progress Report deadline and before the State deadline increased by 17. The Progress Report and the State-calculation methods are the two official methodologies for calculating graduation rate. Although the two rates differed in 2009 because of recognized methodological differences, neither yields a 57% graduation rate, as stated in comments 1 and 60. The result of these differences in methodology is a State-calculated 2009 graduation rate of 53.5% (248 divided by 462). Notably for 2009-2010 and beyond, New York State's methodology will match NYC's by only counting students up to September 1.

We stand behind the 46% graduation rate reported in the Progress Report because it includes all students for whom Jamaica should be held accountable, and it includes only those students who were discharged as graduated before the beginning of their fifth year of high school. Both of those positions will be reflected in State-calculated graduation rates in the future.

Furthermore, Jamaica's administration was presented with the 46.2% graduation rate, as well as the underlying data used to calculate it, and the diploma type for every graduate, during the verification period in October 2010. During this time, Jamaica had the opportunity to correct inaccurate data or appeal the classification of individual students as graduates or nongraduates. Jamaica made no objection during the review period to the calculation of its graduation rate. The school's graduation rate and Regents diploma rate, as reported in the 2009-2010 Progress Report, reflects that post data verification period.

Comments 1, 2, 3, 4, 11, 16, 20, 22, 42, 46, 60, 63(b-c and e), and 64 suggest that the school has not been funded or resourced consistent with the new schools in the building or that the school receives inadequate funding: In New York City, the DOE funds schools through a per pupil allocation. That is, funding follows the students and is weighted based on students' grade level and need (incoming proficiency level, special education, ELL, Title I status, etc.). If a school's population declines from 2,500 to 2,100 students over the course of a year, the school's budget decreases proportionally—just as a school with an increase in students receives more money. Even if the Department had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls. With regard to Jamaica, since the 2005-2006 school year, Jamaica has experienced a register decrease of nearly 1,300 students. As a result of this drop in enrollment levels, the school's budget has been reduced accordingly – schools need fewer dollars to educate fewer students. Like all schools, Jamaica 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.

New schools are funded in the same manner as other schools. Funding follows the students and is based on need (incoming proficiency level, special education, ELL, Title I status, etc.). 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.

Furthermore, principals have discretion over their budget and make choices about how to prioritize their resources to meet the needs of their students with the right staffing, programs, and instructional priorities.

Comment 1 asks about consideration of SAT and AP scores in the DOE grading: SAT scores and AP scores are not currently a part of the Progress Reports for high schools, which focuses on graduation rates. However, the DOE announced in November 2010 that it will be phasing in a set of new college readiness metrics over the next two years, and those metrics will take the SAT and AP tests (among other measures of college readiness) into account.

Comments 3, 6 and 48 state that when the DOE deemed the school failing it inhibited students from enrolling: The demand for Jamaica has been declining for several years and prior to the announcement about the proposed phase-out in 2009. Over the past two years, demand for Jamaica's Educational Option programs declined from an already low average of 2.1 applications per seat for September 2009 enrollment to an average of 1.5 applications per seat for September 2010 enrollment. Similarly, demand for Jamaica's two Screened programs has dropped from 2.7 applications per seat for September 2009 enrollment to 1.8 applications per seat for September 2010 enrollment. Jamaica's Zoned program also has low demand. Only 9% of incoming ninth-grade students who resided within the school's zone were enrolled in Jamaica as of October 31, 2009. This means that the vast majority of zoned ninth graders who were guaranteed a seat at Jamaica chose to attend high school elsewhere. The data points listed above for 2010 reflect high school admissions applications submitted in early December 2009 for students beginning high school in September 2010. This data captures the demand for Jamaica

prior to the DOE's proposed phase-out of Jamaica last year. As a result, these enrollment and demand figures do not reflect the impact of that proposed phase-out announcement.

Comment 6 suggests that Jamaica didn't get any PLA resources or a superintendent. The commenter specifically notes that they've had five superintendents in many months and no more AP classes are offered: Schools identified as PLA are eligible for resources consistent with the State School Improvement process. If the proposed phase out is approved, Jamaica High School will be eligible for School Improvement funds to support the Turnaround model. In most cases, schools undergoing a Turnaround model must replace the principal and at least 50% of the staff. In New York State, the Turnaround model also allows for a school to be phased out and replaced by a new school over time. With regard the Superintendents, Jamaica does have a Superintendent. It is Juan Mendez. Prior to that the school had two others. With regard to AP classes, the school currently offers AP Art History, English Literature and Composition, US History, Calculus AB and Biology.

Comments 6, 9, 27, 30, 33, 34, 35, 43, 46, 50, 52, 56, 60, 63(b), 64, 65 suggest that the DOE has not provided adequate support, does not care about the Jamaica community, has not thoughtfully considered alternatives to phase out and should reconsider phasing out Jamaica and alternatively consider investing more resources and support to Jamaica: All schools receive support and assistance from their superintendent and Children First Network 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.

The EIS describing the proposal to phase out Jamaica outlines a range of instructional, operational, and leadership supports offered to Jamaica. In addition, a number of resources were offered to support students' social/emotional and academic needs, particularly for struggling students. In particular, the DOE provided the following supports:

**Leadership Support:**

- Providing leadership training, mentorship, and extensive coaching for the principal.
- Helping the principal develop Jamaica's Comprehensive Education Plan and use data to set school goals.
- Connecting administrators with other schools to learn effective practices that could be replicated at Jamaica.

**Instructional Support:**

- Providing extensive training for school leaders on teaching through alternative textbooks, units of study, academic language and complex text deconstruction, adolescent literacy, organizational and programming strategies to improve student performance, "Essential Elements of Instruction," new state standards, data systems and reports, Smartboard technology, brain research and instructional practice, awarding credit according to the State Education Department, the language of thinking (Generation 1.5), reframing the path to school leadership, collaborative teacher techniques, how to deal with low performing staff members through the 3020a process, using action research to develop

instructional initiatives, Achieve 3000, Instructional Rounds Roadmap, APEX learning, and Kaplan Virtual Education.

- Helping the school strengthen its social studies and science curriculums through the use of alternative text books.
- Working with Jamaica High School to create teacher teams to monitor English language learners in meeting credit and Regents requirements.
- Organizing and leading weekly meetings with teacher teams to help them analyze data to improve instruction and identify interventions for struggling students.
- Providing extensive training for teachers on developing lesson plans, using data to monitor and revise student activities, aligning instruction to new state standards, analyzing student work to identify intervention strategies, teaching practices for English language learners, setting goals for students with disabilities, individualized instruction, teaching phraseology and reading comprehension, curriculum analysis, and unit planning.

### **Operational Support:**

- Working with the principal to align the school budget with the school's goals.
- Helping the school implement a Coordinated Early Intervention Services grant that was used to provide leadership support to the principal and assistant principal and coaching to school staff on reducing suspensions and absences.
- Providing one-on-one support to the principal and school staff on budgeting, human resources, recruiting and retaining talented teachers, and compliance issues.

### **Student Support:**

- Training guidance counselors on how to use scholarship reports and graduation tracking systems.
- Offering training on crisis response, suicide prevention, gang awareness, bullying, internet safety, Respect for All, creating a safe and supportive school environment.
- Helping the school improve attendance rates by training attendance teachers on time management, effective investigation, documenting discharge planning interviews, and prioritizing investigation visits.

Unfortunately, despite these efforts the school has not turned around. Given the school's lack of success despite supports—whether part of centralized effort to support all schools or individualized plans for Jamaica—it is apparent that Jamaica has not developed the proper infrastructure to meet the needs of its students and families. The school culture and conditions have not enabled increased student achievement. It is our belief that the school does not have the capacity or infrastructure to turn around quickly to increase student performance, and that phasing this school out and bringing in higher quality schools will provide better options for the community and families in the future.

In New York City, we are striving to create a system of great schools. To accomplish this goal, we've replaced 91 of our lowest-performing schools with better options and opened 474 new schools: 365 are traditional public schools and 109 are public charter schools. As a result, we've created more good choices for families.

Comments 1, 10, 41, 60, 62 and 63(f-g) relate to the number of high needs students that Jamaica serves including English Language Learners and special education students: The Progress Report and the comparisons on the Fact Sheets account 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 Education 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.

While Jamaica does serve a very challenging population, it does not follow that it cannot be compared to any other school. It simply means that student characteristics must be considered when making a comparison. Taking into account the student populations they are working with, other schools are achieving better outcomes than Jamaica is with its students.

Other schools in Jamaica’s peer group (including the comparison schools on the Fact Sheet) also have a large number of Level 1’s and 2’s—for high schools the main factor used to determine peer schools is students’ 8<sup>th</sup> grade proficiency—but they are graduating a higher percentage of their students.

The Fact Sheet provides two schools within Jamaica’s peer group for comparison. High School for Hospitality Management (02M296, “Hospitality Management”), a 9-12 school located in Manhattan, is in Jamaica’s peer group, and demographically, the schools are very similar. Their peer indices, based on the 8<sup>th</sup> grade proficiency of students, the percent of students with disabilities, the percent of students who are self-contained, and the percent of students who enter the school overage, are nearly the same (2.26 for Jamaica and 2.28 for Hospitality Management). The schools have approximately the same average 8<sup>th</sup> grade proficiency, and approximately the same percentage of students who enter overage. While Hospitality Management has a lower percentage of students who are English Language Learners than Jamaica, it has a higher percentage of students with disabilities. Over-the-counter enrollment status is not a factor in the peer index. Nevertheless, Hospitality Management has some students admitted over-the-counter, but it is true that Jamaica has more. On the other hand, Hospitality Management has a higher percentage of students eligible for free lunch than Jamaica. In short, the schools’ serve students with very similar characteristics.

On nearly all measures, Hospitality Management is performing much better than Jamaica. Its 4-year graduation rate in 2009-2010 was 80%, 30 percentage points higher than Jamaica’s. Its students attend at higher rates, are more likely to earn 10 or more credits, and have a higher weighted Regents pass rate (which controls for students’ entering proficiency and demographics) in all subjects except Global History. Hospitality Management’s performance has been consistently strong. It earned A’s in each of the three years it has received a Progress Report while Jamaica has earned two D’s in a row after earning two consecutive C’s.

While it is true that Hospitality Management enrolls fewer students than Jamaica, a substantial decrease in enrollment over the past 4 years (from 2,258 in 2006-2007 to 1,474 in 2009-2010) has not helped Jamaica’s performance. Indeed, its Progress Report grade has declined during that time.

Curtis High School (31R450 , “Curtis”), a 9-12 school located in Staten Island, while not in Jamaica’s peer group, is also similar demographically to Jamaica. Its peer index is 2.33, compared to Jamaica’s 2.26. It serves a smaller percentage of English Language Learners, but a higher percentage of students with disabilities, including a higher percentage of students with a self-contained program recommendation. Both schools serve approximately the same number of students who are eligible for free lunch.

Like Hospitality Management, Curtis outperforms Jamaica on nearly every measure. Its 4-year graduation rate in 2009-2010 was 70%, 20 percentage points higher than Jamaica’s. Its students attend at a higher rate, are more likely to earn 10 or more credits, and have a higher weighted Regents pass rate in all subjects except U.S. History. Curtis has received a B on the Progress Report every year since 2007.

Hospitality Management and Curtis were chosen for the purpose of providing anecdotal illustrations of schools achieving better outcomes with similar student populations. Other such comparison schools could be identified. It is important to note that no two schools are identical, each school is unique and faces unique challenges. But the Progress Report does not rely on anecdotes; it is a systematic comparison of Jamaica to its peer schools and other schools in the City, based on multiple metrics from multiple sources, several of which have built in controls for demographic disparities. According to that methodology, which is applied consistently to all schools, Jamaica is among the lowest performing 7% of high schools in the City.

Comment 5 relates to Queens Collegiate’s access to resources and population of students: As noted above, new schools and all schools in NYC are funded through a per pupil allocation. That is, funding follows the students and is weighted based on students’ grade level and need (incoming proficiency level, special education, ELL, Title I status, etc.). Queens Collegiate’s has 4% of English Language Learners and 16% of students with IEPs.

Comment 7 suggests that the policy of having a public comment sign up only until 6:30 needs to be changed: It has been our policy to suggest Joint Public Hearing agenda that allows for sign up until 15 minutes after the start the of hearing. This was designed to assure that the hearing can be managed in a reasonable way that allows for the public to share feedback. This is widely publicized and when a longer sign – up was requested by hearing participants we have accommodated where practicable. There are also other ways to submit public comment including the email address and phone number, also publicized.

Comments 8 and 64 suggests that closing Jamaica will cause overcrowding: This is actually not the case. Currently, low performing schools like Jamaica are serving a very low percent of students living in their zones or catchment area. In the case of Jamaica, this number is 11%. Additionally, the current utilization rate is approximately 82%. The proposal to phase out these schools and replace them with new small schools is expected to generate more interest from the local community which in theory would draw students away from other, more overcrowded schools. Additionally, students zoned to Jamaica typically attend schools across the City; therefore, the deflection of these students would not impact other overcrowded Queens schools

because those are predominantly zoned high schools. And residents of those zones have a priority for seats over residents residing in the zone of Jamaica.

Comments 12, 13, 15, 17, 21, 25, 28, 30, 31, 32, 33, 40, 51, 53, 61, 64, 65 suggest that insufficient engagement was done and that the community does not support the phase-out proposal: The DOE sought community feedback both before and after it published its proposal to phase out Jamaica. Prior to issuing the phase-out proposal, superintendents held parent meetings at struggling schools and asked school communities about what is and is not working. Superintendents also explained the Department's thinking about why the school was struggling and what particular factors show this to be the case. Superintendents also reviewed what supports had already been implemented at the school. The Department developed and distributed Fact Sheets for each school with which we met. These Fact Sheets summarized the proposals and the rationales behind them. The Fact Sheets, which were posted on the DOE's website and distributed at meetings, also included relevant data and clear instructions for how to offer feedback. In addition to the joint public hearings held after the proposal was published, the DOE also sought community feedback by requesting comment via a dedicated e-mail address and phone number. Please refer to the following website to view Jamaica's Fact Sheet and other materials concerning the phase-out and school replacement proposals and joint public hearings: <http://schools.nyc.gov/community/planning/changes/queens/Jamaica>.

The DOE does carefully listen and consider the feedback it receives. The DOE recognizes that a lot of effort has been contributed toward improving the school, but the school has not turned around. It is clear to us that some students have had positive experiences and that there are strong student/teacher relationships in some of our most struggling schools. However, we must ultimately make a decision around the academic rigor of a school and whether or not it has the capacity to support its students. It is our belief that Jamaica does not have the capacity to turn around quickly to meet the needs of its students.

Among the feedback the DOE received regarding the proposed phase-out of Jamaica was support for the Gateway program at the school. The DOE has worked closely with the Gateway program and its key community partners so that the new school being proposed for this building will be modeled after the Gateway program. Students currently enrolled in the Gateway program would have the opportunity to transfer directly from that program into the new school. Further, the DOE will continue to work with the other new schools phasing in to the building to foster opportunities for them to work with the community organizations that have supported Jamaica students in the past.

Comments 14 and 18 related to supports that will be offered to students as the school phases out: Jamaica would continue offering all necessary classes to support current students as they work to meet graduation requirements and earn their high school diplomas. In fact, schools that are phasing out have demonstrated an increase in performance in large part due to the critical leadership and staff changes that may be implemented. Furthermore, as phase-out schools shrink from losing one grade per year, they take on similar characteristics of small schools and graduation rates tend to increase.

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 teacher 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.

With regard to enrollment options for current Jamaica students:

Current first time ninth-grade students would complete high school at Jamaica if they continue to earn credits on schedule. These students also have the option to participate in the High School Admissions Process in February 2011 to apply to a different high school for tenth-grade. Those interested in applying to another school for September 2011 should meet with a guidance counselor and submit a New High Schools Choice Form by February 28, 2011. For detailed information on City high schools, please refer to the Directory of New York City Public High Schools, available in print at DOE middle schools and Borough Enrollment Centers or on the DOE's website at <http://schools.nyc.gov/ChoicesEnrollment/High/Directory/default.htm>.

Current repeat ninth-grade students would complete high school at Jamaica if they earn credits on schedule and pass, at a minimum, their five Regents exams. As the school becomes smaller, these students would receive more individualized attention through graduation to ensure they are receiving the support they need to succeed. Students would also be encouraged to meet with a guidance counselor to review progress toward graduation and consider applying to one of the City's Transfer High Schools. For more information about Transfer High Schools, please visit the following website: [www.goingforme.org](http://www.goingforme.org).

Current tenth, eleventh, and twelfth grade students who are on track to graduate would complete high school at Jamaica if they continue to earn credits on schedule. As the school becomes smaller, students would receive more individualized attention through graduation to ensure they are receiving the support they need to succeed. Students would also be encouraged to meet with their guidance counselor to discuss all of their options.

Current tenth, eleventh, and twelfth grade students who are not on track to graduate would be encouraged to meet with a guidance counselor to review progress toward graduation and discuss all of their options. Depending on their age, academic profile, and credit accumulation, some students may be better served in one of the City's Transfer High Schools or Young Adult Borough Centers ("YABC"), which have strong track records for helping over-age, under-credited students get back on track toward graduation. In general, however, it is expected that most current Jamaica students would remain enrolled at the school as they progress toward graduation. For more information about these options, please visit the following website: [www.goingforme.org](http://www.goingforme.org).

English Language Learners at Jamaica would continue to receive mandated services as the school phases out. Students with disabilities would also continue to receive mandated services in accordance with their Individualized Education Plans ("IEPs").

Comments 17 and 60 related to Jamaica's prior designation as "Persistently Dangerous": It is true that safety has been a concern at Jamaica, but conditions have improved in recent years. Jamaica was removed from both the State's list of Persistently Dangerous schools in August 2008 and from the City's Impact list in October 2008. Feedback on the NYC School Survey also indicates real improvement in safety conditions over the past few years. The DOE will continue to offer supports around safety and security to Jamaica as it phases out.

Comment 19 says that miscalculation of the school's 2009-2010 Progress Report by 2 points would have resulted in a C: The Progress Report calculations go through a rigorous quality assurance process, including several rounds of school verification and opportunity for appeal. There have been no questions raised by Jamaica or anyone else about the calculation of Jamaica's final score. Furthermore, while it is true that Jamaica's overall score was just 2 points below the cutoff for a "C", it does not follow that the school would not be proposed for phase out. All schools that received 3 C's or lower, a D or an F on the Progress Report were considered for phase-out. Jamaica received a C grade in 2007-2008, a D grade in 2008-2009, and a D grade in 2009-2010. Even if it had earned a C in 2009-2010, it would have met this criterion for consideration. Moreover, the Progress Report grade is only a preliminary trigger for consideration. As described earlier in this document, the DOE also takes into account how the State assesses the school's performance, by including schools identified as Persistently Lowest Achieving. Jamaica was identified by the State as Persistently Lowest Achieving in both 2008-2009 and 2009-2010 on the basis of its low graduation rates over a period of three years. With a 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 the school, and whether more significant action is needed. We continue to consider performance data, school culture, and demand information. Deciding to phase out a school is the toughest decision we make. But it is the right thing to do for the students of New York City.

Comments 23, 54 and 57 relate to the sharing of space in buildings with multiple schools: For any building in which the DOE proposes a co-location where two or more schools share space in a building, the Office of Space Planning does a comprehensive site survey and space assessment to determine that there is sufficient space for all schools to be co-located.

Space is allocated based on the Citywide Instructional Footprint (the "Footprint"). 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 additional information on space allocation and use in City schools, please refer to the Footprint on the DOE's website: [http://schools.nyc.gov/NR/rdonlyres/8CF30F41-DE25-4C30-92DE-731949919FC3/87633/NYCDOE\\_Instructional\\_Footprint\\_Final9210TNT.pdf](http://schools.nyc.gov/NR/rdonlyres/8CF30F41-DE25-4C30-92DE-731949919FC3/87633/NYCDOE_Instructional_Footprint_Final9210TNT.pdf).

While the Footprint sets forth a baseline space allocation, school leaders are empowered to make decisions about how to utilize the space allocated to the school. The assignment of individual spaces to a particular school will be determined by the Director of Space Planning in consultation with the Building Council. As in other situations where schools are co-located, the schools will need to share certain large common and specialty rooms in the building, such as the gymnasium, auditorium, library, and cafeteria. Specific decisions regarding the allocation of the

shared spaces as well as the scheduling of those spaces (e.g. when students will have lunch, etc) will be made by the Building Council, consisting of the principals from all co-located schools, in conjunction with the DOE Office of Space Planning.

More than half of schools in New York City share space and manage to build collaborative, shared learning environments. At Jamaica there will be sufficient space to accommodate the phase out of Jamaica while phasing in the new schools. In 2009-2010, building Q470 had a target capacity of 2,116 students, and in 2010-2011 the Q470 building is projected to enroll 1,802 students, which would yield a target utilization of 85%. If this co-location proposal is approved, 28Q350 would open in September 2011, and would serve 250-275 students in grades 9-12. 28Q350 would operate at full capacity in the 2013-2014 school year, serving approximately 400-450 students. 28Q350 would be temporarily co-located with Jamaica High School as the school phases out. Beginning in September 2014, 28Q350 would share space only with Queens Collegiate, Hillside Academy, and Community Leadership. These schools would also continue to expand to full scale as planned. The building would then have an approximate utilization rate of 92%. To date, there are four schools co-located on the Jamaica Campus. Jamaica has been successfully sharing space with Queens Collegiate, Hillside Academy, and Community Leadership. Building Councils are encouraged to work together to create a sustainable shared space plan for the building.

Comments 24 and 36 relate to the options for future students in the Jamaica community: This proposal has the potential to positively impact students residing in the Jamaica zone or catchment area by offering higher-quality options on the campus to families who currently send their children elsewhere in the City—in some cases a significant distance from their homes. Already, students residing in the Jamaica zone represent 25% of students enrolled in the new schools currently phasing in to the building. As those schools continue to grow and as another new school is introduced to the campus, we anticipate that those schools will attract local students back to the building in greater numbers.

In addition to schools on the Jamaica Campus, eighth-grade students residing in the Jamaica zone will continue to have access to a broad range of high school options through the Citywide High School Admissions Process. These include many other Queens high schools, some of which offer academic programs and pathways similar to those currently available at Jamaica. For a list of City high schools, please refer to the New York City High School Directory, which is available in print at DOE middle schools and Borough Enrollment Centers and on the DOE's website at <http://schools.nyc.gov/ChoicesEnrollment/High/Directory/default.htm>. While Jamaica was a zoned option only 11% of students from the zone chose to enroll there. Over 90% of students zoned to Jamaica chose to attend school elsewhere.

Comment 29 says that cheating does not take place at Jamaica: To date we have not confirmed any allegations of cheating at the school.

Comment 30 states that Jamaica has benefits to immigrant and international students by the school would be lost if it is phased out. There are no immediate proposed changes to available instructional or extracurricular programs currently offered at Jamaica High School. Partnerships that are in place would continue to support current students as the school 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 Jamaica High School 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 Jamaica High School students in the past.

Comment 37 suggest that the phase-out is related to wanting to open more charter schools: In New York City, the DOE strives to create a system of great schools. As stated earlier in this document, the DOE has replaced 91 of our lowest-performing schools with better options and opened 474 new schools in order to accomplish this goal. Of the 474, 365 are traditional public schools and 109 are public charter schools. In other words, an overwhelming majority or approximately 77% of the new schools that opened since 2003 are traditional or district public schools. The DOE is proposing to site a new traditional public school, not a charter school, on the Jamaica Campus in 2011-2012.

Comment 38 suggests that the DOE fires staff with the most experience because they are too expensive: The DOE makes staffing decisions consistent with the provisions of the Collective Bargaining Agreement.

Comment 39 suggests that the phase-out will lead to more drop-outs: It is true that phase-out schools do typically experience some increase in the drop out rate. But, it is also true that schools that are phasing out have demonstrated an increase in performance for remaining students in large part due to critical leadership and staff changes that may be implemented. The school will continue to receive critical support from their Children First network team. In addition, as phase-out schools shrink from losing one grade per year, they take on similar characteristics of small schools and realize the same benefits for students.

Comment 44 suggests that Jamaica is at a disadvantage because it does not have restrictive admission policies whereas many other schools do: Jamaica's admits students through a zoned, unscreened program, but also admits students through two programs with screened admissions and two programs with the "educational option" admissions policy. While it is true that Jamaica serves a high need population, there are other schools with similarly challenging populations that are producing high student performance.

Comment 45 suggests that the phase out proposal is part of a plan by the mayor to create vast private wealth: This is factually inaccurate. The phase out of Jamaica is based on longstanding performance struggles and our belief that the school does not have the capacity to turn around quickly to meet the needs of students.

Comment 47 relates to the strategy of opening new schools and its related costs: The DOE believes that replacing failing schools with new small schools is the most effective way to quickly turn around student achievement. In June 2010 MDRC, an independent research group, issued a report on NYC's new small schools strategy. MDRC concluded that "it is possible, in a relatively short span of time to replace a large number of underperforming public high schools

[and] in the process achieve significant gains in students' academic achievement and attainment. And these gains are seen among a large and diverse group of students, including students who entered the ninth grade far below grade level and students of color, for whom such gains have been stubbornly elusive." For additional information on MDRC's report, please refer to the following website <http://www.mdrc.org/publications/560/overview.html>.

Comments 49, 65, 66 relate to the number of applications to the school for 2009-2010: In 2009-2010 Jamaica received 127 applications for 100 seats, a little over 1 application per seat. Citywide average number of applications per seat is 8.1 and many more applications than 1 per seat is needed to even fill a program. While there may have been a rise in number of applications, the demand for the school has declined steadily prior to the announcement about the proposed phase-out. Over the past two years, demand for Jamaica's Educational Option programs declined from an already low average of 2.1 applications per seat for September 2009 enrollment to an average of 1.5 applications per seat for September 2010 enrollment. Similarly, demand for Jamaica's two Screened programs has dropped from 2.7 applications per seat for September 2009 enrollment to 1.8 applications per seat for September 2010 enrollment. This is all to suggest that applicants are not selecting Jamaica among their top choices.

Comment 60 questions why Jamaica did not receive additional credit on the 2010 Progress Report. Additional credit is awarded to schools that are in the top 40% in the City in their weighted diploma rate for ELL students, students with disabilities, and students in the lowest third Citywide, and in the percent of their students in the lowest third Citywide who earn a 75 or higher on the math or English Regents exams. The cut scores for the top 40% are published in Appendix B of the high school Progress Report Educator Guide, available here: [http://schools.nyc.gov/NR/rdonlyres/DF48B29F-4672-4D16-BEEA-0C7E8FC5CBD5/92487/EducatorGuide\\_HS\\_2010\\_11\\_04.pdf](http://schools.nyc.gov/NR/rdonlyres/DF48B29F-4672-4D16-BEEA-0C7E8FC5CBD5/92487/EducatorGuide_HS_2010_11_04.pdf). Jamaica's results were below the cut scores for the top 40% on each of these measures, and it therefore received no additional credit.

Comment 60 also alludes to Jamaica's performance on the National Assessment in Education Progress: There is no Jamaica NAEP score. NAEP does not produce student or school-level results.

Comment 60 also questions Jamaica's identification as a Persistently Lowest Achieving (PLA) school by the New York State Education Department (SED) in 2009. Please note that the SED makes this decision, not the NYC Department of Education. The criteria by which the SED designates schools as PLA are published on its website, here: <http://www.p12.nysed.gov/irs/accountability/LowAchieve/2009/Methodology-IdentifyingPersistentlyLowestAchieveSchools.html>. Jamaica was selected as PLA in 2009 because its graduation rate was below 60% in 2006, 2007, and 2008, according to the State calculation methodology, as published in the State Accountability and Overview Report. Jamaica's graduation rate has not reached 60% in any of those years under either the Progress Report or the State methodologies, and Mr. Eterno's claimed 57% rate does not even meet that threshold.

Comment 61 relates to the letters sent home about the school's safety statistics: When the school was identified as Persistently Dangerous by New York State, letters were sent home as required by law.

Comment 61 suggests that Jamaica applied for small learning community but were rejected for a lack of funds, which the commenters believe is due to racism: Small learning community grants are awarded by the Federal government. School must meet certain eligibility criteria to be considered and then they are awarded based on availability of funds.

Comment 63(a) states that the provision of free and quality education in community-based zoned schools is one of the fundamental responsibilities of the government. The central goal of the DOE is to create a system of great schools. We agree that 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.

Comment 55 asked what the school's budget deficit was: Jamaica is not operating with significant debt. According to the 2009 FY, Jamaica had a deficit of \$106,279 which was to be paid back over 4 years (2010 FY - \$25,000; 2011 FY - \$27,093; 2012 FY - \$27,093; FY 2013 - \$27,093). This is the only debt the school is currently holding.

Comment 66 suggests that the EIS has not met the threshold required by Education Law: The DOE believes that the EIS does meet the requirements of the Education Law.

Comments 58 and 59 are not related to this proposal and do not require a response.

With respect to comment 67, 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.

### **Changes Made to the Proposal**

No changes were made to this proposal.