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Chancellor

Public Comment Analysis[1]

Date: March 8, 2013

Topic: The Proposed Phase-Out of Bread & Roses Integrated Arts High School (05M685), Beginning in 2013-2014

Date of Panel Vote: March 11, 2013

Summary of Proposal

On January 11, 2013, the New York City Department of Education ("DOE") issued an Educational Impact Statement ("EIS") describing a proposal to phase out Bread & Roses Integrated Arts High School (05M685, "Bread and Roses"), an existing high school located in school building M136 ("M136") beginning in the 2013-2014 school year. Bread and Roses is located at 6 Edgecombe Avenue, New York, NY 10030, within the geographical confines of Community School District 5 ("District 5"). Bread and Roses currently serves students in grades nine through twelve. The DOE is proposing to phase out the school based on its poor performance and the DOE's assessment that it lacks the capacity to improve quickly to better support student needs. In a separate EIS also initially posted on January 11, 2013 and subsequently revised, the DOE is proposing to co-locate a new district secondary school, Eagle Academy for Young Men of Harlem (05M148, "Eagle Academy"), in building M136. That proposal can be found here: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm.

The original EIS was amended on February 14, 2013 to include updated descriptions of the admissions criteria at Eagle Academy and clarify that the school will serve only male students. It also includes updated enrollment figures, updated information regarding State Improvement Grants, and corrects typographical errors.

If this phase-out proposal is approved, Bread and Roses will no longer admit new ninth-grade students after the conclusion of the 2012-2013 school year. The school will continue to phase out one grade level per year until it closes in June 2016. Current students will be supported as they

[1] The DOE will continue to accept comments concerning this proposal up to 24 hours prior to the Panel for Educational Policy's ("PEP") vote on March 11, 2013. Any additional comments will be addressed in an amended Public Comment Analysis which will be made available to the PEP before it votes on this proposal.

progress towards graduation while remaining enrolled at Bread and Roses. In cases where students do not complete graduation requirements by June 2016, the DOE will help students and families identify alternative programs or schools that meet students' needs so that they may continue their education after Bread and Roses completes phasing out.
Bread and Roses is co-located with KAPPA IV (05M302, "KAPPA IV"), an existing district middle school that currently serves students in grades six through eight, and with Mott Hall High School (05M304, "Mott Hall"), an existing high school that currently serves students in grades nine through twelve.

Bread and Roses and Mott Hall admit students through the Citywide High School Admissions Process. Bread and Roses admits students through the educational option method. Mott Hall admits students through the limited unscreened method. KAPPA IV admits students through the District 5 Middle School Choice Process.

If this phase-out proposal is approved, Bread and Roses will continue serving currently enrolled students, but will begin phasing out one grade each year beginning in September 2013 and will complete its phase-out after the 2015-2016 school year. In a separate EIS, the DOE is proposing to open a new district secondary school, Eagle Academy, in building M136 beginning in September 2013. That proposal can be found at: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm. Eagle Academy will grow to full-scale as Bread and Roses phases out. The new school, which will serve only male students, will open with sixth grade, adding one grade annually and reaching full-scale in the 2019-2020 school year with a grade span of six through twelve.

Copies of the EIS are also available in the main offices of Bread and Roses, KAPPA IV, and Mott Hall.

Summary of Comments Received at the Joint Public Hearing

A Joint Public Hearing regarding this proposal was held at school building M136 on February 13, 2013. At that hearing, interested parties had the opportunity to provide input on the proposal. Approximately 82 members of the public attended the hearing, and 18 people spoke. Also present at the hearing were: Principal of Bread and Roses, Rodney Lofton; Bread and Roses School Leadership Team ("SLT") representatives Pooja Bhaskar and Andrea Wilson; Principal of Mott Hall High School and member of the school's SLT, Altagracia Villalona; Principal of KAPPA IV and member of the school's SLT, Juan Vives; Community Education Council 5 ("CEC 5") Vice President, Ernest Bryant Jr.; CEC 5 Secretary, Ayishah Irvin; Manhattan High School Superintendent, Anthony Lodico; Community Superintendent for District 5, Gale Reeves; Council of School Supervisors and Administrators representative, Juanita Bass; United Federation of Teachers ("UFT") representative, Duane Clark; Deputy Chancellor Dorita Gibson, DOE representative Laura Feijoo, and Representatives from the DOE's Office of Portfolio Management, Sara Kaufman, Meera Jain, and Ashley Davies.

A subsequent Joint Public Hearing regarding the revised proposal to open and co-locate new secondary school Eagle Academy for Young Men of Harlem (05M148) with KAPPA IV

(05M302), Matt Hall High School (05M304) and Bread and Roses Integrated Arts High School (05M685) in School Building M136, Beginning in 2013-2014 was held at school building M136 on March 5, 2013. A separate document of Public Comment Analysis contains the comments regarding this proposal, but comments made regarding the proposal to phase out Bread and Roses made at either of the two joint public hearings are contained within this document.

The following comments and remarks were made at the Joint Public Hearings

1. District 5 CEC member, Ernest Bryant Jr., opposed the overall proposal and made the following comments:
    a. The DOE has not supported Bread and Roses, and it is the DOEs responsibility to do so.
    b. Students need smaller class sizes and more hands on instruction.
    c. The school has a good principal.
2. Bread and Roses SLT member, Pooja Bhaskar, opposed the proposal and expressed the following concerns:
    a. Bread and Roses has gone through many types of interventions but the school did not receive the resources it was supposed to receive.
    b. Bread and Roses serves a higher needs population of students that other schools refuse to take.
    c. The school has implemented new initiatives, formed new partnerships, and has seen positive outcomes and should be given more time to improve.
    d. 50% of the staff at Bread and Roses is new and has been working well together to make positive improvements in the school.
3. Bread and Roses SLT member Andrea Wilson opposed the proposal and:
    a. Questioned how the phase out model helps to improve a school's test scores, graduation rates, and attendance rates, and questions whether new schools have higher outcomes with similar students.
    b. Asserted that schools that have closed have had higher populations of ELL students and students with special needs and closing schools will make it harder to serve the most difficult to serve students.
    c. Asserted that phasing out schools does not work.
    d. Asserted that although its four-year graduation rate may be low, Bread and Roses has a higher six-year graduation rate and is serving its students well in the time they need.
4. Council of School Supervisors and Administrators representative, Juanita Bass, voiced general opposition to the proposal and:
    a. Noted that more than two dozen schools are currently slated for closure and that these schools have different performance grades, state statuses, and received different quality review scores.
    b. Voiced concern that struggling students are turned away from new schools and "warehoused" in schools that are failing.
    c. Referenced the multiple interventions that the DOE tried to make, but concluded that the proper supports were not provided.
5. UFT representative, Duane Clark, opposed the proposal, and:
    a. Stated that the new teachers the school has brought in are great.
    b. The DOE has not provided the school with support.

6. Multiple commenters suggested that Bread and Roses has not been provided the support needed to improve.
7. Multiple commenters suggested that Bread and Roses has not been given enough time to improve and should be given more time to turn around.
8. Multiple teachers and staff from Bread and Roses spoke on behalf of their students and talked about the positive relationships between students and staff and the sense of community that exists at the school.
9. Several Bread and Roses students and parents stated that the teachers go out of their way to help their students learn and that they have been learning.
10. One commenter spoke about the new partnership Columbia University's School of Social Work has with Bread and Roses and that the high school and University should be given a chance work together and demonstrate results.
11. Multiple commenters stated that Bread and Roses serves a high needs population and does not turn students away. Instead, they help all students learn.
12. One commenter questioned the Progress Report grades, and suggested that students be given strength-based assessments.
13. Several commenters suggested that Bread and Roses needs lower class sizes in order to improve.
14. Multiple students commented that they spoke no English when they arrived to high school and were turned away by other schools but accepted at Bread and Roses where they were able to learn English.
15. Several students in the twelfth grade commented that they were not on track when they started school, but Bread and Roses and the school community have supported them and they are now on track.
16. One parent explained that he had initially heard negative things about Bread and Roses, but his child has performed better at the school than at any previous school he attended.
17. One student explained that he was in and out of jail before coming to Bread and Roses, but has since passed his Regents exams and made his family proud.
18. One commenter stated that Bread and Roses is a family, and the room should be filled with people.
19. A Bread and Roses teacher commented that he just took his class to CCNY to compete against students from some of the best high schools in the city and has since seen more positive results in his classroom.
20. One commenter stated that the DOE does not lower class sizes because it would cost more money.
21. One commenter stated that Bread and Roses has completely changed and the new leadership is doing a great job.
22. One commenter suggested that everyone wants the best for children, thus we must work together rebuild Bread and Roses rather than shut it down.
23. One commenter stated that the community needs to come together to speak out against the phase out of Bread and Roses.
24. One student from Bread and Roses spoke about how much she cares for her teachers.
25. One commenter spoke about the school's need for consistency, and how Bread and Roses has not had that consistency.

26. Several commenters noted that Bread and Roses had been proposed to close and re-open under Turnaround last year, but this never happened and they do not understand why the DOE is now returning to phase out the school.
27. One teacher from Bread and Roses spoke on behalf of his students and shared several questions they raised, including:
    a. Why is the school closing?
    b. Why is the school being phased out over three years and not closing immediately?
    c. What happens to students who are not able to graduate before the school closes?
    d. Why aren't students able to transfer to other schools?
    e. Why are schools with high numbers of minority students being phased out?
    f. What supports will be provided to students as the school phases out?
    g. What will happen to the teachers?
28. One commenter, a teacher at Bread and Roses, asserted that:
    a. She reviewed the Quality Review rubric and believes Bread and Roses has made significant progress and would earn high marks on the Quality Review.
29. Her students are doing well and want to stay, but fear they will not get the supports they need as the school phases out and are considering transferring.
30. Vice President of Academic High Schools for the UFT, opposed the proposal and stated the following factors have contributed to the poor performance of the school:
    a. Lack of support,
    b. Multiple changes in leadership, and
    c. School accepts a higher needs population of students.

During the Question and Answer period, the following question was submitted:

31. Why does the DOE want to close down Bread and Roses?

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

The DOE received no written comment via e-mail.

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

In response to comments 1(a), 2(a), 4(c) 5(b), 6, and 29, 30(b) concerning supports offered to Bread and Roses: All schools receive support and assistance from their superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. Struggling schools receive supports as part of system-wide efforts to strengthen all schools; and they also receive individualized supports to address their particular challenges. We do everything we can to offer struggling schools leadership, operational, instructional, and student supports that can help turn a struggling school around.

The DOE has offered numerous supports to Bread and Roses, including:

Leadership Support:

- Coaching the principal and assistant principals in the use of classroom observations and feedback to enhance teacher effectiveness.
- Supporting school leadership in aligning curriculum to Citywide instructional expectations to raise standards for teacher practice and student learning.
- Coaching principals and assistant principals in using performance and accountability data to inform school-wide improvement goals.

Instructional Support:

- Providing training for teachers in ways to improve lesson planning and differentiate instruction to ensure that learning is challenging and engaging for students.
- Coaching school staff in monitoring students' credit accumulation and Regents test scores, in order to identify areas where students are falling behind and adjust instructional planning and academic programming accordingly.
- Facilitating school-wide professional development aimed at raising the rigor of instruction across all content areas.
- Providing direct instructional coaching for math, social studies, and science teachers to support the development of rigorous curriculum, mapping and rubrics to enhance instructional coherence and consistency.

Operational Support:

- Providing support to the school in the management of mandates and compliance requirements for students with disabilities to ensure such students receive mandated services.
- Advising the school on grant implementation and working with the principal to align the budget with the school-wide instructional goals.
- Advising the school on budgeting, building management and staffing.

Student Support:

- Working with the principal to design and implement an advisory program for seniors to support students in increasing credit accumulation, passing Regents exams, meeting graduation requirements, and completing the college application process.
- Coaching the school in evidence-based guidance and counseling strategies to build the school's capacity to offer social and emotional support to students.
- Working with school leadership and guidance counselors to implement college admissions counseling for students.
- Facilitating work with vendors and external partners to provide extra-curricular opportunities for students to increase student engagement.

In response to comments 1(b), 13, and 20 concerning class sizes at Bread and Roses: Class size is primarily determined by how principals choose to program students at their school within their budget. Thus, no particular proposal, in and of itself, necessarily impacts class size. The DOE, however, will provide support to schools to ensure that the schools use their space efficiently in order to maximize capacity to support student needs and maintain appropriate delivery of special education and other related services to students.

Additionally, schools 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 and special education/ELL/Title I status). If a school's population declines from 2,500 to 2,100 students, for example, the school's budget decreases proportionally—just as a school with an increase in students receives more money.

Principals have discretion over their budget and make choices about how to prioritize their resources, including deciding whether to purchase textbooks, etc.

In response to comments 1(c), 2(d) 5(a) 8, 9, 14-18, 21, 23, and 24 which discuss the positive aspects of the school and its standing in the community: The DOE acknowledges the positive experiences of some students and staff at Bread and Roses over the years. However, the decision to propose the school for phase-out is driven by a commitment to helping all students succeed, and the performance of Bread and Roses over the past several years suggests that many students are not being well served.

In addition, the DOE recognizes the important role that schools play in their communities and knows that schools throughout the City are not just educational institutions, but rich and tight-knit communities. The DOE expects that the school proposed to replace Bread and Roses will be fully engaged with the community.

In response to comments 2(b), 3(b), 11, and 30(c) indicating that the school's poor performance is caused by the demographic features of its student population (e.g., special needs, ELL needs, etc.): When evaluating a school, each school's performance is compared to the performance of schools in its peer group, which is comprised of New York City public schools with student populations most like the school's population, according to the peer index. The peer index is used to sort schools on the basis of students' academic and demographic backgrounds, and the formula to calculate a high school's peer index includes the percentage of students with disabilities, the average 8th grade English and Math proficiency scores of incoming students, percentage of students with self-contained placements, and the percentage of overage students. For high schools, each school has up to 40 peer schools, up to 20 schools with peer index immediately above it and up to 20 with peer index immediately below it. Thus, Bread and Roses is grouped in its peer group with other New York City public schools with similar student academic and demographic background.

Based on these factors, other schools in Bread and Roses' peer group have overall better student outcomes. For example, both Bread and Roses and Explorations Academy, an existing Bronx high school which is in Bread and Roses' peer group, serve a similar population of students with IEPs, overage students, and students in self-contained sections. The percentages for Bread and Roses are 26%, 14%, and 14%, respectively for these populations. As for Explorations Academy, those numbers are 25%, 15%, and 15%, respectively. Yet Explorations Academy's four-year graduation rate is at 63% compared to 41% at Bread and Roses. These statistics show that student demographics do not determine student performance and that all students regardless of their background should have their needs met in school. The DOE holds all schools accountable on these measures.

In response to part of comment 3(b) and 4(b) which questions whether the schools replacing phase-out schools serve a similar demographic of students:

While some may believe that new schools are outperforming the schools that have been phased out because they serve less challenging student populations, the demographics data shows that this is not true.

The student demographics of the high schools the DOE phased out to the new small schools the DOE created in their place, the new schools are very similar in terms of the percentages of black and Hispanic students, English language learners ("ELLs"), and students with disabilities:

- Black or Hispanic
  - New Small High Schools – 94.5%
  - Phase Out High Schools – 94.2%

- ELL
  - New Small High Schools – 16.8%
  - Phase Out High Schools – 18.8%

- Students with Disabilities (with IEP's)
  - New Small High Schools – 14.9%
  - Phase Out High Schools – 10.3%

In response to comments 2(c), 19, and 21 regarding what commenters asserted were areas of recent improvement at Bread and Roses: The DOE commends and acknowledges the students and staff of Bread and Roses for their hard work, and notes that the Bread and Roses community is working towards improving the school. However, the DOE believes that drastic action must be taken given the school's overall performance struggles and continued overall decline.

In response to comments 2(c) and 10 regarding the partnerships at Bread and Roses: The DOE notes that the partnerships offered by Bread and Roses would continue to exist during the school's phase-out, though the specific programs and partnerships offered may change. That is true for any City student as all schools modify offerings annually based on student demand and available resources. The proposed new school is also expected to partner with community-based organizations to provide programming for its students.

Additionally, as Bread and Roses phases out and the new school phases in, the DOE will work to assist in continuing these partnerships and/or developing new ones to further the educational experience of the students.

In response to comments 3(a), 3(c), 4(a), 22, and 30 which question the DOE's overall strategy of phasing-out and replacing low performing schools across New York City: The DOE is committed to providing a portfolio of high quality school options to students and families because every child in New York City deserves the best possible education. A part of that strategy involves identifying the City's lowest performing schools and determining whether they can turn around quickly to better serve their student population. For the schools that the DOE

determines lack the capacity to turn around quickly to better serve their student populations, the DOE recommends the most serious intervention: gradually phasing out the school over time by no longer enrolling new students. To ensure that as many students as possible have access to the best possible education, under this Administration, New York City has replaced 140 of our lowest-performing schools with better options and opened 590 new schools: 427 districts schools and 163 public charter schools. As a result, we've created more high-quality choices for families. Graduation rates at new schools are higher than the schools they replaced. Here are a few examples:

- *Manhattan:* The new schools located on the Seward Park Campus in lower Manhattan had a graduation rate of 71.1% in 2011, compared to Seward Park High School's graduation rate in 2002 of 36.4% (Seward Park High School completed its phase-out in 2006).
- *Manhattan:* The new schools located on the Park West Campus in Manhattan had a graduation rate of 72.2% in 2011, compared to Park West High School's graduation rate in 2002 of 31.0% (Park West High School completed its phase-out in 2006).
- *Brooklyn:* In 2011, the schools on the Van Arsdale campus in Brooklyn had a graduation rate of 86.7%—about 40 points higher than the former Harry Van Arsdale High School's graduation rate of only 44.9% in 2002 (Van Arsdale High School completed its phase-out in 2007).
- *Brooklyn:* The Erasmus Hall High School graduated only 40.3% of student in 2002. The new schools on the Erasmus campus are getting tremendous results, graduating 71.4% of students in 2011. (Erasmus Hall High School completed its phase-out in 2006.)
- *Queens:* The new schools located on the Springfield Gardens Campus in Queens had a graduation rate of 68.8% in 2011, compared to Springfield Gardens High School's graduation rate in 2002 of 41.3% (Springfield Gardens High School completed its phase-out in 2007).
- *Bronx:* The new schools located on the Evander Childs Campus in the Bronx had a graduation rate of 72.6% in 2011, compared to Evander Childs High School's graduation rate in 2002 of 30.7% (Evander Childs HS completed its phase-out in 2008).

In response to part of comment 3(a) and comment 12 which pertain to the accuracy of the data the DOE uses to make determinations about schools: The DOE makes every effort to ensure its data is vetted and true to its sources, especially with regard to the data used for Progress Reports. Though a commenter may disagree with which data is used or how it is used, this does not mean the data is incorrect.

In response to comments 2(c) and 7 which request that Bread and Roses be given more time to improve: The DOE counts on each of the City's schools to provide a high-quality education to its students and holds all schools to the same high standard. If a school is not getting the job done for its students, we are compelled to take serious action to ensure its students do not fall even further behind.

Struggling schools must be given a real chance to improve, but if the school continues to fail after receiving additional support, we must make the difficult decision to replace the failing school with a new option.

The DOE cannot stand by and allow schools to keep failing our students when we know we can—and we must—do better. Deciding to phase out a school is the toughest decision the Department makes. But it is the right thing to do for current and future students.

In response to comment 3(d) which states that the six-year graduation rate is much higher than the four-year graduation rate: Although the six-year graduation rate is higher than the four-year graduation rate at Bread and Roses, the six-year graduation rate still puts Bread and Roses in the bottom 12% citywide and borough-wide. Both metrics in addition to the metrics outlined in the response to comments 21 and 25(a) suggest that many students currently at Bread and Roses could be better served.

In response to comment 23, 27(a), 28(a), and 30 which asks why Bread and Roses is being phased-out: As stated previously in response to other comments, the DOE is committed to providing a portfolio of high quality school options to students and families because every child in New York City deserves the best possible education. A part of that strategy involves identifying the City's lowest performing schools and determining whether they can turn around quickly to better serve their student population. For the schools that the DOE determines lack the capacity to turn around quickly to better serve their student populations, the DOE recommends the most serious intervention: gradually phasing out the school over time by no longer enrolling new students.

Bread and Roses has struggled for years, and the school's performance during the 2011-2012 school year further demonstrates the DOE's assessment that the school lacks capacity to turn around quickly to better support student needs.

- Four-year graduation rates have remained below 61% for the last seven years and have been declining since 2008-2009. Bread and Rose's four-year graduation rate (including August graduates) was 41% in 2012—well below the most recent Citywide average of 65.5% (Citywide average is based on the 2011 New York State reported graduation results for DOE students).
- First year credit accumulation is a key predictor of student success because students who fall behind early in high school often have trouble getting back on track to graduate. In 2011-2012, only 56% of first-year students at Bread and Roses earned at least 10 credits with at least 6 of those credits earned across 3 of the 4 core subject areas. This rate of credit accumulation puts Bread and Roses in the bottom 6% of high schools Citywide.
- Bread and Roses was identified by the SED as a Priority school, defined by SED as among the bottom 5% of schools in the state.
- The Progress Report measures the progress and performance of students in a school, as well as the school environment, compared to other schools serving similar student populations. Bread and Roses earned an F grade on its 2011-2012 annual Progress Report, including F grades for Student Progress, Student Performance, School Environment, and College and Career Readiness. Bread and Roses has a history of low performance, including D grades on both the 2009-2010 and 2010-2011 Progress

Reports.

- Only 28% of students in the Class of 2011 (all students who entered high school four years earlier) enrolled in a two- or four-year college, vocational school, or public service program by December 31, 2011. This is significantly lower than the Citywide average of 49%.

In addition to understanding this data, the DOE had conversations with school staff, parents, students, communities, and networks to get a holistic sense of what is happening at the school and what supports or interventions would most likely improve student outcomes. In early engagement meetings at these schools, the DOE had conversations with constituents about what is working and what is not working before making an decision about the supports or interventions that would best support student outcomes.

At the end of this multistep process, the DOE's analysis and engagement yielded a set of schools, including Bread and Roses, that quantitative and qualitative indicators show do not have the capacity to significantly improve.

Comment 25 attributes Bread and Rose's low performance high teacher turnover and lack of consistency the school has experienced over the years.

The DOE recognizes the struggles that Bread and Rose's has experienced over the years. Please refer to the response to comments 2(c), 3(a), 3(c), 5, 17, 19, 20, and 21 for an explanation of why it is not appropriate to delay the implementation of the phase-out based on leadership issues. The DOE believes that the proposals to gradually phase-out and replace Bread and Roses will provide a better option for the Bread and Roses community.

Comment 26 pertains to the DOE's decision to phase-out Bread and Roses after withdrawing its proposal to implement the Turnaround Model at the school last year.

Last year, 24 Persistently Low Achieving schools were approved for closure and replacement in the spring of 2012. However, due to an arbitration with the teacher's union, the schools remained open and the DOE provided emergency funds ($18 million total) to schools to carry out instructional strategies already planned for the new school year.

All of these 24 schools were identified as Priority schools by the State. Of these 24 schools, the DOE had early engagement conversations with nine of them.

Six of these nine schools are now being proposed for phase-out because they have continued to show declining performance or consistent underperformance. These schools have not demonstrated the ability to dramatically improve student achievement. The DOE believes that the best intervention strategy for these six schools is to phase them out and replace them with new schools that will provide students with higher quality educational options. That is why the DOE is proposing to phase-out Bread and Roses as opposed to implementing another intervention model.

The new leadership and programming implemented as a result of the closure and replacement model last year, while very important, are still only two components of a school. The school

culture and conditions have not enabled increased student achievement. It is the DOE's belief that phasing out and replacing Bread and Roses will provide a better option for the community and families in the future.

Comment 27(b) asks why Bread and Roses is being gradually phased out rather than closing immediately.

Under this proposal, Bread and Roses will continue serving currently enrolled students, but will begin phasing out one grade each year beginning in September 2013 and will complete its phase-out after the 2015-2016 school year. With a gradual phase out, students currently attending Bread and Roses will have the opportunity to complete their high school experience at Bread and Roses if they so choose and current students will be supported as they progress towards graduation. The DOE believes that this strategy is less disruptive than immediately closing the school.

Comment 27(c) asks what happens if students do not graduate before the school closes in June 2016?

As stated in the EIS for this proposal, in cases where students do not complete graduation requirements by June 2016, then DOE will help students and families indentify alternative programs or schools that meet the students' needs so that they may continue their education after Bread and Roses completes phasing out.

Comment 27(d) pertains to student's ability to transfer out of Bread and Roses.

Previously, transfers were only available for students in certain schools identified by New York State. This year, for the first time, all students who attend schools in the process of phasing out are eligible to apply to transfer to a higher performing school. This new transfer option will provide students the opportunity to attend a school that may better meet their needs and interests. In March, eligible students will receive a transfer application by mail. The applications will be customized by grade level and each student will see a list of the schools to which he or she can apply, including many schools that have a track record of success. When making transfer offers, the DOE places those students with the greatest need and lowest scores first. Students and their families can learn more about this transfer opportunity and the Public School Choice program at information sessions, which will be held throughout the city in mid-March.

Comment 27(e) suggests that the DOE targets specific communities and schools with a high percentage of students of color for phase-out.

The DOE does not consider student or community demographics when making decisions about interventions for struggling schools. A detailed description of the process by which the DOE arrives at a phase-out proposal is provided in the response to comments 21 and 25(a).

Comments 27(f) and 30(a) ask about supports provided to students as the school phases out.

While the DOE knows that phasing out and replacing Bread and Roses is the right decision for this community, we take seriously our obligation to provide high-quality support to students in schools that are phasing out.

Supports for students in phase-out schools have evolved over several years as we have learned what differentiated support is needed to support these schools and students.

If phase out proposals are approved, schools will receive support in the areas of budget, staffing, programming, community engagement, guidance and enrollment including, but not limited to:

- Helping the school provide students with options that support their advancement, and fully prepare students for their next transition point.
- Working with school staff to foster a positive culture.
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

In September 2011, 26 schools began phasing out. These schools have received additional funding and specialized network support. Middle schools and high schools that began phasing out in September 2011 have been supported by the Transition Support Network.

In September 2012, 17 additional schools began phasing out. All schools undergoing the process of phasing out are now supported by the Transition Support Network.

Comment 27(g) pertains to what will happen to the teachers once the school is closed?

If the phase-out proposal is approved, all teachers, administrative, and non-pedagogical staff at Bread and Roses will be excessed over the course of the phase-out in accordance with existing labor contracts. This process will take place gradually as student enrollment declines will each successive graduating class. With fewer students, the school's staffing need will naturally be reduced.

Changes Made to this Proposal

No further changes have been made to the amended proposal.