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Chancellor

Public Comment Analysis¹

Date: March 8, 2013

Topic: The Proposed Opening and Co-location of Three New High Schools (08X320, 08X348, 08X349) with Herbert H. Lehman High School (08X405), P721X@X405 (75X721), Renaissance High School for Musical Theater and Technology (08X293), and Westchester Square Academy (08X558) in School Building X405, Beginning in 2013-2014

Date of Panel Vote: March 11, 2013

Summary of Proposal

On January 17, 2013, the New York City Department of Education (“DOE”) issued an educational impact statement (“EIS”) describing a proposal to open and co-locate three new district high schools (New School 1, “08X320;” New School 2, “08X348;” and New School 3, “08X349”) in school building X405 (“X405”) on the Herbert H. Lehman Educational Campus (“Lehman Campus”), beginning in the 2013-2014 school year. The Lehman Campus is located at 3000 East Tremont Avenue, Bronx, NY 10461, within the geographical confines of Community School District 8 (“District 8”).

If this proposal is approved, the three new high schools will be co-located with the following organizations: Herbert H. Lehman High School (08X405, “Lehman High School”), a district high school serving students in grades nine through twelve; Renaissance High School for Musical Theater and Technology (08X293, “Renaissance High School”), a district high school serving students in grades nine through twelve; Westchester Square Academy (08X558, “Westchester Square”), a district high school currently serving students in ninth grade that is in the process of phasing in and will serve students in grades nine through twelve when it reaches full scale; a District 75 inclusion program (75X721, “P721X@X405” or “D75 inclusion program”); the Lehman Young Adult Borough Center (X408, “YABC”); a school-based health center operated by the Montefiore Medical Center (“Montefiore Health Center”); and a part-time GED Plus - Learning-to-Work program (X950, “GED Plus - LTW”).

In a separate EIS posted on January 17, 2013, the DOE initially proposed to phase out and eventually close Lehman High School. That proposal has now been withdrawn. Instead, the current enrollment reduction already in progress at Lehman High School will be expanded to further allow the school to improve by narrowing its focus to fewer academic programs and a smaller number of students.

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. Those additional comments will be addressed in an amended Public Comment Analysis which will be provided to the PEP before it votes on this proposal.

On March 7, 2013, the DOE issued an amended EIS concerning the proposal to co-locate three new district high schools in the X405 building which included updated enrollment projections, building utilization information, and space allocations for the schools on the Lehman Campus, but which did not substantially revise the proposal.

The proposed opening and co-location of three new district schools in X405 is part of the DOE's central goal to create new school options that will better serve future students and the community at large. If approved, the new schools will offer rigorous academic programs that will be open to students through the Citywide High School Admissions Process. All three schools will have a limited unscreened admissions method giving priority to students residing or attending school in the Bronx.

In addition to the phase-in of three new schools, Westchester Square will continue to phase in. The DOE is also planning to increase Westchester Square's ninth-grade enrollment in 2013-2014. These additional students will be admitted through a screened admissions program.

The amended EIS containing additional details of this proposal can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm>.

Copies of the amended EIS are also available in the main offices of Lehman High School and Westchester Square.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding the proposals to co-locate the three new schools and phase-out Lehman High School was held at the X405 building on February 26, 2013. Members of the School Leadership Team ("SLT") from every school organization in the X405 building were invited to participate. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 400 members of the public attended the hearing, and 55 people spoke. Present at the meeting were Lehman High School Principal Rose LoBianco; Lehman High School SLT representatives Jeffrey Greenberg, Ubayed Muhith, and Louis Cirillo; Renaissance High School Principal Maria Herrera; 75X721 Principal Frank Degennaro; Westchester Square Principal Sara Dingley; Community Education Council ("CEC") 8 representative Bryan D'Ottavi; New York City Councilman James Vacca; Community Board 10 District Manager Kenneth Kearns; a representative from the Office of New York State Assemblyman Michael Benedetto; a representative from the Office of New York State Senator Jeffrey Klein; Bronx High School Superintendent Carron Staple; United Federation of Teachers ("UFT") representatives Farheen Malik and Eliu Lara; and DOE staff members, including Deputy Chancellor Shale Polakow-Suransky, Gregg Bethel, Sara Kaufman, Ashley Davies, and Henry Bluestone Smith.

The following questions, comments, and remarks concerning this co-location proposal were made at the joint public hearing:²

1. Councilman James Vacca expressed several concerns regarding the co-location plan:
 - He feared that the new schools will be unable to offer Advanced Placement courses

² The joint public hearing occurred prior to the withdrawal of the proposal to phase-out Lehman High School. Many commenters at the hearing expressed opposition to the phase-out proposal. However, this public comment analysis only concerns comments that relate to the proposal to co-locate three new schools in X405.

- He felt that the EIS does not provide adequate information about the proposed new schools.
2. One commenter, who identified herself as the treasurer of the Lehman High School Parent Association, asked what the proposed new schools would do for special needs students in the community.
 3. A number of commenters at the hearing questioned the effectiveness of the small school model of which the proposed new schools would be a part.

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

4. Community Board 10 submitted a letter in which it suggested that the new schools offer programming relating to the medical and health professions.

The DOE received a number of Written and/or Oral Comments along with comments at the Joint Public Hearing which did not directly relate to the Proposal

5. A written question asked how the DOE knows that opening new small schools to replace large struggling schools works.

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

Comment 1 suggests that not enough information regarding the proposed new schools has been made available.

Consistent with Chancellor’s Regulation A-190, which governs the content of EISs, the EIS describing this co-location proposal contains a great deal of information about 08X320, 08X348, and 08X349, including:

- The grade spans, phase-in periods, and projected enrollment for each school (Section II)
- The admissions methods and application process for each school(Section III.A)
- The campus-wide extra-curricular and athletic programs that students at the new schools will have access to (Section III.A)
- The amount of space that will be allocated to each new school (Section III.B)
- The impact that the new schools will have on borough-wide high school seat capacity (Section III.C)
- The initial cost of instruction and budgetary allocations at the new schools (Section V)

Additional details, such as the name of the new schools and what the educational focus of each school will be made available after the PEP vote on March 11. New school leaders will be introduced to the public at the Citywide Council of High Schools’ meeting on March 13, 2013 and will subsequently be introduced at district-specific CEC meetings.

All of this information will be available to students and families as they make their decisions with respect to applying for transfers or enrolling at one of the new schools in September 2013. After the PEP has voted on this and other new school proposals on March 11, 2013, the 2013-2014 High School Directory will be available on the DOE Web site at: <http://schools.nyc.gov/ChoicesEnrollment/High/Publications/default.htm>.

Comments 1, 3, and 5 raise the issue of programming capabilities and the overall effectiveness of small schools.

Small schools across New York City currently offer Advanced Placement and College Now courses in addition to other electives, depending on the particular school and student demand. Schools on a campus can also collaborate to offer electives to students across the various schools on the campus. As a result, the programming capabilities of the proposed new schools will not be limited as implied by the commenters, and instead will be subject to the same constraints of funding and demand that programming that schools across the City face, including Lehman High School.

In addition, the data indicates that small schools can effectively promote student achievement. In a June 2010, MDRC, an independent research group, issued a report on NYC's new small schools strategy. MDRC concluded: "it is possible, in a relatively short span of time, to replace a large number of underperforming public high schools in a poor urban community and, in the process, achieve significant gains in students' academic achievement and attainment. And those gains are seen among a large and diverse group of students — including students who entered the ninth grade far below grade level and male students of color, for whom such gains have been stubbornly elusive." (MDRC, "Transforming the High School Experience," June 2010.)

Findings released in January 2012 from MDRC showed that these small schools are having a sustained effect on graduation rates with positive impacts for virtually every subgroup. In addition, the small high schools show positive impacts on five-year graduation rates and on a measure of college readiness.

To ensure that as many students as possible have access to the best possible education, under this Administration, New York City has replaced 142 of the lowest-performing schools with better options, opening 576 new schools: 427 district schools and 149 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 HS 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 HS 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 HS 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 HS complete 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 HS 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).

Our new schools are overwhelmingly getting the job done for students, and when they aren’t, and a school is struggling, we follow the same process to phase out and replace that school.

Comment 2 concerns the ability of small schools to serve special need students.

As indicated in the table below, the percentage of students with disabilities at new, small high schools across the City actually exceeds the percentage of students with disabilities at phase-out schools, many of which were larger high schools.

Percentage of Students with Individualized Education Programs	
New Small High Schools	14.9%
Phase out High Schools	10.3%

Examples from the Bronx include the Roosevelt Campus, Morris Campus, South Bronx Campus, and the Evander Childs Campus. At all four of these campuses, there were higher percentages of students with disabilities enrolled at the new schools in 2011 than had been enrolled at the large high schools on these campuses in the years that their respective phase-outs began.

In addition, as stated in the EIS, high school students with IEPs, with the exception of those students recommended for a D75 placement, will be admitted to the three new schools in the same manner as general education students. Schools will ensure that students with disabilities continue to receive mandated services in accordance with their IEPs while also ensuring such students have opportunities to learn alongside their non-disabled peers to the greatest extent possible.

Comment 4 requests that the new schools offer programming relating to the medical and healthcare professions.

The DOE affords school leaders a great deal of autonomy with respect to selecting educational programming that best serves their school community. Decisions regarding the educational focus of 08X320, 08X348, and 08X349 will be made by the principals of each organization.

The DOE conducts a lengthy review process for prospective new school models. All three of the new schools described in this proposal will provide strong, comprehensive academic programs that will prepare students for a variety of college and career options. While 08X320, 08X348, and 08X349 will not offer themed or Career and Technical Education-based courses of study, the DOE is confident that all three proposed schools, if approved, will offer educational programming that is relevant to students and the broader community.

Changes Made to the Proposal

The DOE has withdrawn the proposal to phase out Lehman High School. This co-location proposal has subsequently been amended to reflect the projected enrollment and building utilization rate for schools in the Lehman Campus.