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Chancellor

### **Public Comment Analysis<sup>1</sup>**

Date: March 8, 2013

Topic: The Proposed Phase-out of Jonathan Levin High School for Media and Communications (09X414) Beginning in 2013-2014

Date of Panel Vote: March 11, 2013

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### **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 Jonathan Levin High School for Media and Communications (09X414, “Levin High School”), an existing high school located in school building X410 on the William Howard Taft Educational Campus (“X410” or “Taft Campus”), beginning in the 2013-2014 school year. The Taft Campus is located at 240 East 172<sup>nd</sup> Street, Bronx NY 10457, within the geographical confines of Community School District 9 (“District 9”). Levin High School currently serves students in grades nine through twelve. On February 4, 2013, the DOE released an amended EIS which included an updated description of how this and other pending proposals will impact high school seat capacity in the Bronx, updated information regarding State Improvement Grants, and corrected typographical errors. These changes did not substantially revise the proposal.

Levin High School is co-located with the following six district schools: The Urban Assembly Academy for History and Citizenship for Young Men (09X239, “UAA History and Citizenship”), an existing high school serving students in grades eleven and twelve, which is phasing out; Bronx Collegiate Academy (09X227, “Bronx Collegiate”), an existing high school serving students in grades nine through twelve; DreamYard Preparatory School (09X329, “DreamYard”), an existing high school serving students in grades nine through twelve; Bronx High School of Business (09X412, “School of Business”), an existing high school serving students in grades nine through twelve; Bronx High School for Medical Science (09X413, “School for Medical Science”), an existing secondary school serving students in grades six through twelve; and Claremont International High School (09X564, “Claremont International”), a new school that opened with ninth grade in September 2012 and is in the process of phasing in. In addition, building X410 houses a school-based health center operated by the Montefiore Medical Center (“Montefiore Health Center”) and a Living for the Young Family Through Education (“LYFE”) program.

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<sup>1</sup> 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.

If this phase-out proposal is approved, Levin High School 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 at a time until it closes at the conclusion of the 2015-2016 school year. Current students will be supported as they progress towards graduation while remaining enrolled at Levin High School. 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 Levin High School completes phasing out.

In another EIS, also released on January 11, 2013 and amended on February 4, 2013, the DOE proposed to open a new school, 09X350, in building X410 in September 2013. If that proposal is approved, 09X350 will serve students in grades six through twelve and will offer an educational program geared towards serving over-aged middle school students and supporting them through high school. It will phase in over a four year period, opening with sixth- and seventh-grade components in 2013-2014, adding an eighth-grade component in 2014-2015, adding ninth- and tenth-grade components in 2015-2016, and adding eleventh- and twelfth-grade components in 2016-2017. The school's enrollment will continue to grow until it reaches full-scale in 2018-2019, at which point 09X350 will serve 350-420 students in grades six through twelve.

The EIS containing the details of the phase-out proposal and the EIS describing the proposed opening and co-location of 09X350 on the X410 campus can be accessed here:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm>.

Copies of the EISs are also available in the main offices of all schools located on the X410 campus.

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

A joint public hearing regarding this proposal and the related co-location proposal was held at the X410 building on February 13, 2013. Members of the School Leadership Team ("SLT") from every school organization in the X410 building were invited to participate and confirmed their availability to attend the hearing. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 175 members of the public attended the hearing, and 50 people spoke. Present at the meeting were: Levin High School Principal Nasib Hoxha; School for Medical Science Principal William Quintana; School for Medical Science SLT Chairman Orlando Avila; a Bronx Collegiate SLT representative, Patrick Sprinkle; School of Business Principal Vincent Rodriguez; Claremont International Principal Elizabeth Demchak; DreamYard Principal Alicia Wargo; New York City Council member Maria del Carmen Arroyo; Community Education Council 9 ("CEC 9") President Marilyn Espada, along with CEC 9 representatives Carmen Ramos, Nicole Graham-McCathern, and Nora Mercado; Levin High School SLT representatives Faustino Rosa, Delores Norris, Carolyn Corleio, Kassandra, Yara Ruiz, Lisa Ray, Michael Grant (who is also the Levin High School United Federation of Teachers' ("UFT") chapter leader), Jeanette Logan (who is also the Levin High School District Council 37 representative), and Barbara Hull; Adhim DeVeaux, a member of the UAA History and Citizenship SLT; Constance Asiedu from the Citywide Council of High Schools; UFT Vice President Janella Hinds; Robert Powell, the Bronx Borough President's appointee to the Panel for Educational Policy ("PEP"); and DOE representatives including Deputy Chancellor Marc Sternberg, Deputy Chief Operating Officer Melissa Harris, and Amanda Cahn, Jean-Pierre Jacquet and Henry Bluestone Smith from the Office of Portfolio Management Director of Planning.

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

1. Michael Grant, a member of the Levin High School SLT and the school's UFT Chapter Chair, made a presentation that:
  - a. attributed the school's declining achievement rates to the student demographics at Levin High School. In particular, Mr. Grant pointed to purported recent increases in the percentage of English Language Learner ("ELL") students, the percentage of students who qualify for free lunch, and the percentage of Students with Disabilities ("SWDs") attending the school.
  - b. asserted that the decision to propose the school for phase-out was made based on erroneous data, and that changes to the Progress Report scoring method – namely the purported removal of indicators that reward schools for moving the lowest performing students forward – had harmed the school.
  - c. asserted that the school is a living memorial to Jonathan Levin's legacy as an educator.
  - d. referenced the importance of Levin High School's unique, media-based curriculum.
2. The Levin High School SLT also presented a video that had been produced by current students. The video included interviews with a number of student and staff members who:
  - a. voiced general opposition to the phase-out proposal;
  - b. spoke highly of the curricular offerings at the school (and the media program in particular).
3. A group of Levin High School staff members, led by the school's English as a Second Language ("ESL") teacher, made another presentation which also attributed the school's struggle with achievement to student demographics. The presentation offered a testimonial from a Levin High School alumnus who currently attends the Syracuse School of Communication; she stated that she could not have succeeded without the support she received from Levin High School.
4. CEC 9 President Marilyn Espada contended that:
  - a. the DOE is not treating Levin High School fairly because other schools receiving several consecutive "F" grades on their Progress Reports were not slated for phase-out.
  - b. the DOE is punishing Levin High School for accepting a high number of students who do not understand English.
  - c. She also asked why there were no proposals to close schools in Staten Island.
5. Nasib Hoxha, the Principal of Levin High School, pointed out that:
  - a. the school has the same staff and same administration that it had when it received A and B grades on the Progress Reports, so the impact of the student body's changing demographics must be taken into account when assessing the school's performance.
  - b. the media program increases students' connection to their school and that the care and attention that current teachers provide to students are a tribute to the school's namesake.
6. CEC 9 Representative Nicole Graham-McCathern voiced general opposition to the phase-out proposal, arguing that Levin High School should be given the opportunity to improve and that no DOE-based support services are currently offered to students who need them.

7. Adhim DeVeaux, a member of the SLT at UAA History and Citizenship, stated that, based on her experience with the phase-out at UAA History and Citizenship, she felt the goal of phase-out was to break the teachers' union rather than to help children. She also stated that other countries in the world do better for students without phasing schools out, and that the decision to phase-out Levin High School had already been made because the Mayor pays members of the PEP.
8. Constance Asiedu from the Citywide Council of High Schools suggested that the DOE should be held accountable for calling students failures, and that the DOE does not provide enough support for students or resources for parents. She further requested the DOE to listen to the students to get a better sense of how schools can support their needs.
9. New York City Councilmember Maria del Carmen Arroyo stated that she was impressed by the presentations and asked the Deputy Chancellor to reconsider the proposal. She further stated that the DOE has a tendency to place good administrators in schools that the DOE plans to close, and that there are incredible educators in the system that just need help from the DOE to empower schools to develop all high school students in four to six years.
10. UFT Vice President Janella Hinds spoke in opposition to the phase-out proposal.
  - a. Ms. Hinds cited the school's namesake as a primary reason why the school should be allowed to continue serving students.
  - b. She also attributed the school's academic struggles to the high numbers of SWDs and over-age or ELL students. She stated that these students are now receiving the encouragement and support that they need at Levin High School and she urged the DOE to reconsider the proposal and to provide "real support" instead of phasing the school out.
11. One commenter, who identified himself as a representative from the Council of School Supervisors and Administrators, spoke out in opposition to phase-outs as a reform strategy across DOE schools. The commenter mentioned that he had worked at Taft High School and that the same issues that Taft struggled with now plague Levin High School. He believes that the source of these schools' problems is the Mayor's inability to support new schools that opened during his administration.
12. Many commenters, including current and former students along with Levin High School staff members and parents, spoke in general opposition to the phase-out proposal. These commenters felt that the staff at the school is providing necessary supports and individualized attention to students and, often citing personal success stories, they argued that Levin High School is meeting students' needs.
13. A number of commenters highlighted the importance of the Levin High School media program as a unique course of study that provides students with real-world job opportunities and communication skills.
14. Several comments in opposition to the phase-out proposal made reference to the school's namesake. The school is named after Jonathan Levin, an educator who worked at Taft High School before he was murdered in 1997. These commenters stated that the school serves as a living memorial to Mr. Levin's work and dedication to students in the community, and that closing the school would be a mistake.

15. Many commenters also objected to the phase-out proposal on the grounds that the school's performance struggles were a product of changes to the demographic composition of the student body. These commenters generally contend that the school has been saddled with increasingly high rates of ELL students and students with disabilities. These commenters indicated that the DOE has not provided the school with adequate support to serve these students effectively.
16. One commenter, who identified himself as a Bronx UFT representative, stated that DOE has given up on Levin High School, which has not received the necessary resources to succeed. He also questioned if closure was a viable solution for schools in need of improvement, like Levin High School.
17. One commenter, who identified herself as a teacher at Levin High School, highlighted the "open door" nature of the school as a key reason why the school must remain open and continue to serve the community.
18. One commenter, who identified himself as a guidance counselor at Levin High School, stated that he has not seen anything in the way of support from the DOE over the past two years.
19. One commenter, a graduate of Levin High School, spoke in opposition to the phase-out proposal and stated his belief that closing the school would amount to a form of discrimination and that it would be taking away a fundamental human right of education and freedom.
20. Jonathan Levin's mother also spoke in opposition to the phase-out proposal. She stated that:
  - a. it is the DOE, not the staff, that is under-serving this school and the students.
  - b. her son had written a grant for a media center before he died, and that the media center had now become a jewel in the South Bronx that must be allowed to remain open.
  - c. she generally opposes phase-out as a strategy for improving schools and believes that education is a public service, not a business, and that it's time for education to be determined by educators, not businessmen.
21. One commenter disagreed with the DOE's methods for assessing school performance. He pointed out that students are not numbers, but human beings, and that while the school isn't perfect, its impact on students can't be measured by numbers.
22. One commenter speaking in opposition to the proposal asked if any of the DOE representatives who were present had sent kids to public schools in the Bronx.
23. Several commenters asked where kids would go if the DOE closed Levin High School.
24. CEC 9 President Marilyn Espada, speaking on behalf of a student with an Individualized Education Program ("IEP") who had drafted a letter in opposition to the phase-out proposal, stated that despite the fact that the school has over 60% students with IEPs, it still offers these students exciting opportunities to engage with school programs and to succeed academically.
25. One commenter speaking in opposition to the phase-out proposal drew attention to budget cuts and asked how schools could serve students effectively when they don't have adequate resources.

26. One commenter, identified as an educator at the co-located Bronx Collegiate Academy, spoke favorably about the campus culture that has developed at the Taft Campus. The commenter noted that Levin High School has a culture that helps to build family ties between schools in the building, and that in seeking to phase the school out, the DOE is sending a toxic message to all students who attend school on the campus.

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

27. A written question received at the public hearing read as follows: “Why not replace the administration instead of phasing the school out? What supports were given to the school when it received a second C?”
28. A written question received at the public hearing asked if there was a less damaging approach to improving schools aside from phase-out and closure.

### **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**

The Analysis of Public Comments regarding the related proposal to open and co-locate a new school (09X350) in the X410 building is available at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm>.

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

Comments 1a, 3, 4b, 5a, 10b, 15, and 24 all suggested that Levin High School’s poor performance is attributable to changing demographics, namely the number of students it serves that are either English Language Learners (“ELLs”), students with disabilities (“SWDs”), or underperforming incoming ninth-grade students.

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 8<sup>th</sup> grade English and Math proficiency scores of incoming students, percentage of students with self-contained placements, and the percentage of over-age 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, Levin High School is grouped in its peer group with other New York City public schools with similar student academic and demographic backgrounds. As a result, schools are not put at a disadvantage for serving high numbers of students from high-need backgrounds or student groups.

This means that, for the purposes of the school’s Progress Report grades, Levin High School is not held in comparison to all schools across the City or to all other schools in the X410 building, but rather to other DOE schools that have similar percentages of students from these same student groups.

According to the 2012-2013 audited register, 37% of students at Levin High School are identified as ELL students, 25.4% of students have IEPs, and 15.7% of students are served in self-contained classes.

**Students with Disabilities/ELLs:**

Comments 1 and 3 included various data concerning the number of ELLs and SWDs enrolled at Levin High School.

Comment 1 indicated that:

- 36% of Levin High School students were of Limited English Proficiency in 2010-2011
- 56 students were identified as ELLs in 2010-2011
- 21 students were identified as students with disabilities in 2010-2011

In particular, Comment 3 indicated that:

- 39% of Levin High School students are ELLs as compared to the citywide average of 14%
- 17% of Levin High School students are served in special education environments as compared to the citywide average of 15%
- Levin High School serves more beginning level ELLs than intermediate or advanced ELLs, and has been obtaining improved New York State English as a Second Language Achievement Test (“NYSESLAT”) results with beginning level ELLs.
- ELLs at Levin High School are adequately served, evidenced in part by the reported 72.6% ELL 4-year diploma rate in 2010-2011
- Other schools on the X410 campus serve fewer ELLs and SWDs than Levin High School.

Like all New York City public schools, Levin High School has a responsibility to serve all students who are admitted to the school, and the school must adapt to the changing needs of its student body. As indicated in the following table, Levin High School has served fairly consistent levels of students with IEPs and students who are in self-contained class settings for the past three years:

School Year	Percentage of Levin High School students with IEPs	Percentage of Levin High School students in self-contained classes
2010-2011	20%	11%
2011-2012	24%	13%
2012-2013	24%	13%

In addition, the percentage of students with IEPs, the percentage of students in self-contained class settings, and the percentage of students identified as over-age at Levin High School are all comparable to the averages of other schools in the Levin High School peer index. The table below includes all District 9 schools in the Levin High School peer group as well as averages for all schools in the peer group.

DBN	School name	% IEP	% Self-Contained	% Over-age	Overall PR Score	4 Yr Grad Rate
09X227	Bronx Collegiate Academy	22.8%	14.1%	16.6%	73.1	56.0%
09X404	School for Excellence	28.8%	16.1%	18.9%	71.7	56.9%
09X412	Bronx High School of Business	26.4%	17.5%	17.7%	55.1	42.5%
09X276	Leadership Institute	20.4%	14.8%	17.0%	46.0	44.6%
09X414	Jonathan Levin High School for Media and Communications	25.4%	15.7%	20.2%	40.3	31.2%
<b>Average for all schools in the Levin High School Peer Group</b>		29.0%	16.5%	19.6%	56.7	50.5%

This data indicates that other schools are serving similar student populations and producing better results.

Thus, with respect to the percentage of students with IEPs, the percentage of students served in self-contained classes, and the percentage of over-age students, the data does not support a claim that Levin High School's achievement levels are limited by the presence of these students. As noted throughout this document, Levin High School has been proposed for phase-out based on the school's poor performance relative to that of other schools in the Levin High School peer index group. The percentage of students at Levin High School with IEPs (25.4%) is lower than the average for schools in Levin High School's peer index group (29.0%). The percentage of students at Levin High School who are served in self-contained classes (15.7%) is also lower than the average for schools in Levin High School's peer index group (16.5%). The percentage of students at Levin High school who are identified as over-age (20.2%) is only slightly higher than the average for schools in Levin High School's peer index group (19.6%). Therefore, it cannot be said that the percentage of students with IEPs, the percentage of students who are served in self-contained settings, or the percentage of students who are identified as over-age are the cause of the school's ongoing struggles with student performance.

Moreover, the DOE expects schools to serve all students who enroll, and this means that when changes in the student population occur, schools need to adapt their educational programming to meet the changing needs of their students. The data suggests that Levin High School has not adequately adapted to meet the needs of its SWD population, which, as indicated above, has remained relatively steady over the last three years.

The same is true with respect to Levin High School's ELL population. The DOE acknowledges that Levin High School serves a higher percentage of ELL students than most schools in Levin High School's peer index group, district, and borough. At the same time, as indicated in the following chart, the percentage of students at Levin High School who are identified as ELLs has remained fairly constant for three years.

School Year	Percentage of Levin High School students identified as ELLs
2010-2011	38%
2011-2012	40%
2012-2013	37%

As stated above, the DOE expects schools to meet the changing needs of their students and the data suggests that this has not happened for ELL students attending Levin High School.

While Comment 3 indicated that in 2010-2011 the ELL 4-year diploma rate was 72.6%, the existing data for Levin High School, as reported by NYSED, indicates that in 2010-2011 the ELL 4-year graduation rate was 34%.<sup>2</sup> It is worth noting that the overall 4-year graduation rate at Levin High School in 2010-2011 was at a comparable 38%.

In addition, while Levin High School serves an above average percentage of ELL students, these students are nonetheless performing at rates below those of their ELL peers at other schools. A comparison between the 4-year graduation rates for both ELL and all students at Levin High School and the average 4-year graduation rates for students at other Bronx high schools is included in the following table. This data

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<sup>2</sup> The cited source for this figure in the SLT Presentation is the State Report Card 2010-2011, which can be accessed at: <https://reportcards.nysed.gov/files/2010-11/AOR-2011-320900011414.pdf>.

suggests both that ELL students are being underserved at Levin High School and that the school’s ongoing struggles with achievement are not simply a product of the fact that the school serves an above average percentage of ELL students.

<b>Student Group</b>	<b>School Year</b>	<b>4-year Graduation Rate for ELLs</b>	<b>4-year Graduation Rate for All Students</b>
Levin High School	2009-2010	38.2%	50.4%
All Bronx High Schools	2009-2010	42.0%	59.2%
(Difference)	2009-2010	3.8%	8.8%
Levin High School	2010-2011	33.9%	38.6%
All Bronx High Schools	2010-2011	38.2%	57.5%
(Difference)	2010-2011	4.3%	18.9%

Tellingly, the presentation used in Comment 3 excluded comparative ELL data for Bronx Collegiate, which is also located in the X410 building and part of Levin High School’s peer index group. According to the audited register, 34% of students at Bronx Collegiate Academy are identified as ELLs. Not only is this figure comparable to the 37% of students at Levin High School who are identified as ELLs, but moreover, Bronx Collegiate Academy has experienced a sharper increase in the percentage of students identified as ELLs over the past three years than Levin High School. Despite serving a comparable number of ELLs, Bronx Collegiate Academy was able to earn an overall A grade on its latest Progress Report.

The SLT presentation in Comment 3 also included slides showing how ELL students have fared on the New York State English as a Second Language Achievement Test (“NYSESLAT”) over the past several years. One slide showed the breakdown of ELL students who enroll at Levin High School into three groups (beginning, intermediate, and advanced) based on their level of English comprehension across three years. Another slide showed the NYSESLAT reading and writing exam results of those three groups of ELL students over the past four years. A third slide in this section of the SLT PowerPoint presentation showed Language Assessment Battery-Revised (“Lab-R”) exam data from 2012. Taken together, these slides were used to suggest that the school has been serving an increasingly high-needs ELL population and that this has contributed to the school’s ongoing struggles with student performance.

The DOE acknowledges that over the past several years, as evidenced by the NYSED data showing the composition of ELL students who sat for the NYSESLAT and Lab-R exams, the composition of Levin High School’s ELL population has included higher percentages of students who enter at the beginning NYSESLAT level. As noted earlier, however, Levin High School has a responsibility to serve all students who are admitted to the school, and the school must adapt to the changing needs of its student body.

In addition, the suggestion that this higher-need ELL population is contributing to the lower performance of the school is not supported by the data. This can be demonstrated by reference to the progress metrics on the school’s latest Progress Report. As indicated in the table below, the two progress metrics that the school struggled with most – the Weighted Regents Pass Rate in Math and U.S. History – are ones where ELL students performed at rates that are very comparable to their non-ELL peers.

Progress Report Metric	School's Result	ELL Students Result	Non-ELL Students Result
Weighted Regents Pass Rate – Math	0.4	0.41	0.39
Weighted Regents Pass Rate – U.S. History	0.37	0.35	0.39

Thus, with respect to the percentage and composition of ELL students at Levin High School, the data does not support a claim that Levin High School’s achievement levels are limited by the presence of these students. Levin High School has been serving a stable number of ELL students for several years, those students continue to perform at lower rates than their ELL peers at other high schools, and the ongoing performance struggles that ELL students at Levin High School have endured are also experienced by their non-ELL peers. Therefore, it cannot be said that the percentage of students identified as ELLs or the composition of the ELL population at Levin High School is the cause of the school’s ongoing struggles with student performance.

**Underperforming 9<sup>th</sup> graders:**

Mr. Grant’s presentation suggested that Levin High School’s poor performance is also attributable to the fact that many of the school’s incoming ninth grade students are underperforming. He argued that

- Many incoming ninth graders have spent several years in struggling middle schools in Community School District 9 (“CSD 9”), which has been designated by the state as a “District in Need of Improvement” (“DINI”)
- 92% of Levin High School’s incoming 9<sup>th</sup> graders performed at Level 1 on 8<sup>th</sup> grade ELA/math exams
- 78% of incoming 9<sup>th</sup> graders were absent more than 16 days in 8<sup>th</sup> grade
- 33% of incoming 9<sup>th</sup> graders are over-age and under-credited
- Levin High School’s peer index rate declined from 2.3 in 2006 to 1.35 in 2011
- The current peer index of Levin High School is lower than the peer index of other schools on the X410 campus

Progress Report indicators, which are reviewed as part of the struggling schools investigation process, take into account the achievement level of students when they arrive at a new school. As a result, schools are not penalized for serving high numbers of high-need or low-achieving students. Indeed, other schools in Levin High School’s peer index group serve similar student groups and produce better results.

There are a number of schools in the Levin High School peer index group, including Bronx Collegiate which is co-located with Levin High School in the X410 building, whose ninth-grade students enter with similar or lower achievement levels, and whose graduation rates and overall school quality scores are significantly higher than those of Levin High School. Examples of schools which are in the same peer group and District (CSD 9) as Levin High School, but which are serving their students better, are included in the chart on the following page.

DBN	School name	8th Grade Math/ELA	Overall PR Score	4-Yr Grad Rate
09X276	Leadership Institute	2.37	46	44.6%
09X414	Jonathan Levin High School for Media and Communications	2.37	40.3	31.2%
09X227	Bronx Collegiate Academy	2.39	73.1	56.0%
09X404	School for Excellence	2.43	71.7	56.9%
09X412	Bronx High School of Business	2.43	55.1	42.5%

The same is true of with respect to Levin High School’s over-age students. In terms of the overall percentage of all enrolled students who are identified as over-age, Levin High School serves 20.2% while the average for the schools in Levin High School’s peer index group is at a comparable rate of 19.6%. This means that the school is not put at a disadvantage with respect to Progress Report scores by the presence of over-age students.

In terms of the percentage of ninth-grade students who are identified as over-age, according to audited register data, 39% of Levin High School’s ninth-grade students are currently identified as over-age. As indicated in the table below, several Bronx high schools in Levin High School’s peer group have ninth-grade cohorts with comparable or larger percentages of over-age students and have nonetheless received significantly higher overall Progress Report scores.

DBN	School name	% of 9th Grade Students who are Over-age	Overall PR Score
10X397	English Language Learners and International Support Preparatory Academy	100%	49.8
09X276	Leadership Institute	39%	46
09X414	Jonathan Levin High School for Media and Communications	39%	40.3
09X412	Bronx High School of Business	37%	55.1
12X692	Monroe Academy for Visual Arts & Design	35%	57.1

The SLT presentation (Comment 3) also showed a decline in Levin High School’s peer index. A lower peer index suggests that a school is serving a large student body with high needs. When a school’s peer index undergoes a significant shift, the school’s peer group may change so that the school can continue to be evaluated in comparison to schools that serve similar student populations. As a result, the protracted decline in Levin High School’s peer index is taken into account by the Progress Report and is not counted against the school.

The average peer index for schools in Levin High School’s peer group is 1.33, while the peer index for Levin High School is 1.35. In addition, of the six schools in Levin High School’s peer group with lower peer index scores that were eligible to receive Progress Report grades this year, three received an overall A grade and two received an overall B grade:

DBN	School name	Peer index	Overall PR Score	Overall PR Grade
14K322	Foundations Academy	0.9	38.3	F
02M500	Unity Center for Urban Technologies	1.06	75.9	A
19K660	W. H. Maxwell Career and Technical Education High School	1.21	65.7	B
08X305	Pablo Neruda Academy for Architecture and World Studies	1.32	67.8	B
11X455	Harry S Truman High School	1.33	71	A
09X404	School for Excellence	1.34	71.7	A
09X414	Jonathan Levin High School for Media and Communications	1.35	40.3	D

As discussed earlier, the DOE expects all schools to adapt to the changing needs of their students. Here, the SLT’s presentation acknowledged that the peer index of Levin High School has undergone a consistent decline for five years now, which means that the school has had ample time, but has failed, to re-orient itself to better serve its high-needs population.

Though the presentation compared Levin High School’s peer index rate with other schools on the X410 campus, it should also be noted that two of the schools, Bronx High School for Medical Sciences and DreamYard Prep, with peer index rates that are considerably higher than the peer index rate at Levin High School, are *not* part of Levin High School’s peer group. This means that Levin High School’s achievement metrics were not compared to these schools for the purposes of assessing performance.

Bronx Collegiate Academy and Bronx High School of Business are included in Levin High School’s peer group, and although their peer index rates are slightly higher than Levin High School, all three rates are comparable. Both Bronx Collegiate and Bronx High School of Business maintain higher four- and six-year graduation rates, higher credit accumulation rates, higher college/career readiness rates, and higher overall Progress Report grades than Levin High School. As discussed above, the majority of schools in the same peer group with lower peer index rates than Levin High School received higher overall Progress Report grades because they are serving similarly challenging student populations better.

As a result, the idea that Levin High School’s ongoing performance struggles are a direct result of the achievement levels of students who enter the school in ninth grade is not supported by the data.

**Other Metrics:**

- Comment 3 also indicated a decline in attendance rates at Levin High School from 90.5% in 2006 to 81.3% in 2011.

Other schools serving similar student groups have not experienced similar declines in attendance, which again suggests that Levin High School’s attendance problems are not simply a product of demographic changes at that school.

- Comment 3 also indicated that 60% of students who attend Levin High School in September leave before the end of the school year, and that as a result, the maximum percentage of students earning 10+ credits in their first year cannot possibly exceed 40%.

This claim reflects a misunderstanding of how the Progress Report's credit accumulation metrics are calculated.<sup>3</sup> Students may leave school during the school year for a variety of reasons, some of which reflect on the quality of instruction provided by the school and the school's environment, others of which do not. As described below, this is accounted for in the Progress Report.

The credit accumulation metrics on the Progress Report are calculated using audited register data which is a snapshot of enrollment taken each year at the end of October. As a result, the fact that some students may enroll at Levin High School in September, but leave the school in the first few months of a given school year would not have any negative impact the school's credit accumulation score.

In addition, there are a variety of circumstances under which students who are discharged from any given DOE school after the audited register is taken would not be included when calculating that school's credit accumulation rates. For example, if the school receives documentation that a student is admitted to a private school, discharged to a court ordered placement, transferred to a school outside of NYC, deceased, admitted to a four-year university, or if the student has already received a high school diploma from a non-DOE organization, then that student would no longer be factored into the school's credit accumulation score. Therefore, the fact that 60% of new ninth-grade students at a given school may leave during the school year would not by default limit that school's first-year credit accumulation metric to 40%.

At the same time, students who are discharged for any reason other than those described above are considered dropouts. The DOE includes these students when calculating credit accumulation rates at a given school in order to ensure that schools are held accountable for their students' educational outcomes.

- Comment 3 also reflected changes in the four- and six-year graduation rates at Levin High School between the 2009-2010 cohort (which had a 50% four-year graduation rate and a 66.7% six-year graduation rate) and the 2010-2011 cohort (which had a 38% four-year graduation rate and a 69% six-year graduation rate). This data was used in the presentation to suggest that changing demographics in the student body at Levin High School are the primary cause for the school's ongoing struggles with student performance.

As a preliminary matter, the data does not actually refer to the 2010-2011 and 2009-2010 cohorts, but rather to the four- and six-year graduation rates as reported on the Levin High School Progress Report in those years.<sup>4</sup>

The graduation rates reflected on this slide are troubling. In 2009-2010, when the four-year graduation rate was at 50%, the school was in the bottom 25% of all schools in Levin High School's peer index group and the bottom 8% of all high schools Citywide. In addition, the 50% four-year graduation rate represented a decline from 2008-2009 when the four-year graduation rate was 53%. This decline has accelerated over the past two years. While the slide shows a marginal increase of 2.3% in the six-year graduation rate between 2009-2010 and 2010-2011, this increase is far outweighed by the 12% decline in four-year graduation rates that occurred during this same period. Overall, the graduation rates indicate

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<sup>3</sup> For more information regarding how Progress Report metrics are calculated, please refer to the Educator Guide for High School Progress Reports, which is available on the DOE Web site at: [http://schools.nyc.gov/NR/rdonlyres/E25F8B70-1C47-4212-9D01-94EC0C56993C/0/EducatorGuide\\_HS\\_2013\\_01\\_04.pdf](http://schools.nyc.gov/NR/rdonlyres/E25F8B70-1C47-4212-9D01-94EC0C56993C/0/EducatorGuide_HS_2013_01_04.pdf).

<sup>4</sup> The four-year graduation rate and six-year graduation rate reported in a Progress Report on any given year reflect graduation rates from two different cohorts: one which began high school four years earlier and one which began high school six years earlier. As a result, the data labeled '2009-2010 cohort' in the SLT Presentation actually refers to the four-year graduation rate of the 2006-2007 cohort but the six-year graduation rate of the 2004-2005 cohort and the data labeled '2010-2011 cohort' in the SLT Presentation actually refers to the four-year graduation rate of the 2007-2008 cohort but the six-year graduation rate of the 2005-2006 cohort.

that Levin High School’s students are graduating at a far lower rate than other schools serving similar populations of students.

A central goal of the Children First Reform is to improve the educational outcomes for students at the high school level, as measured most notably by graduation rates. When the DOE identifies a school like Levin High School where the graduation rate is persistently below other, similar schools, the Department has an obligation to intervene on behalf of students to ensure that high-quality educational options are available to every child. Data from every year since the DOE began implementing the phase-out and replacement reform model confirms that graduation rates at new schools far exceed the graduation rates at the schools which they replaced. For example, for the class of 2010-2011, 70% of students at new schools graduated in four years, as compared with 46% of students at phase-out schools.

In addition, it is worth noting that the changes in the four-year graduation rate between 2009-2010 and 2010-2011 cannot be traced back to the changes in demographics cited in the SLT presentations, which occurred in 2009-2010 and 2010-2011. The cohorts being compared on this slide began high school during the 2006-2007 and 2007-2008 school years which, as shown in the table below, was before Levin High School had experienced a notable increase in the percentage of high-need student groups cited in the SLT presentations.

	<b>% of students identified as ELL</b>	<b>% of students identified as Special Education<sup>5</sup></b>
2006-2007	N/A <sup>6</sup>	13%
2007-2008	26%	10%
2008-2009	26%	12%

On the latest Progress Report, which was not included on the graduation rate slide, the four-year graduation rate for Levin High School (31%) along with the six-year graduation rate (61%) both declined yet again. Here too, this decline took place despite the fact that the school did not receive an increased percentage of ELL students, students in self-contained classes, or students with IEPs.

Therefore, the data does not support the claim that the changes in four- and six-year graduation rates between 2009-2010 and 2010-2011 are simply a result of changing demographics in the student body.

- Comment 3 also contained a PowerPoint slide that focused on 2009-2010 cohort data (i.e. data about students whose cohort is due to graduate in Spring 2013). The slide indicated that from June 2012 to September 2012 seventeen students were added to this cohort, but none of the students were added to the twelfth grade.

It is important to note that the data on this slide reflects changes to enrollment that have occurred during the current school year. Therefore, the potential impact of these additional 17 students on the school’s performance and graduation rate is not yet evident, and therefore was not (and could not have been) considered in deciding to propose Levin High School for phase-out.

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<sup>5</sup> The DOE does not have audited register data showing the number of students with IEPs from before 2009. The percentage of students identified for Special Education is not equivalent to the percentage of students with IEPs or those in SC class settings, however it does help show whether or not there was a significant change in the proportion of high-need student groups attending Levin High School from 2006-2009.

<sup>6</sup> The DOE does not have audited register data showing the number of ELL students at a given school prior to the 2007-2008 school year.

That said, students are reflected in a given school's graduation rate if they are attending that school at the end of their fourth year of high school. This means that schools are held accountable for students who transfer in, even if they are behind on credits. This method of calculating graduation rates is used by both NYSED and the DOE and it applies to all schools.

As compared to other schools in the same peer index group, the data suggests that Levin High School is not disproportionately burdened by the presence of over-age students who are placed at the school through over-the-counter ("OTC") placement.<sup>7</sup> The audited register indicates that 5% of Levin High School's current enrollment consists of over-age students who arrived at the school through OTC placement. The average for schools in Levin High School's peer index group is at 4%. Therefore, it cannot be said that Levin High School is put at a significant disadvantage in terms of Progress Report scores by the amount of over-age students who arrive at the school through OTC placement.

- Lastly, Comment 3 also detailed the total number of students in self-contained classes at Levin High School this year along with the percentage of students in the school with IEPs (22%).

The data on this slide is drawn entirely from the current 2012-2013 school year and thus has had no impact on the investigation process or the proposal to phase-out Levin High School.

Comment 1b suggested that the decision to propose Levin High School for phase-out was made using enrollment data that contained errors.

It is worth noting that Mr. Grant's presentation, the Levin High School SLT presentation, the EIS describing the proposal to phase-out Levin High School, and the 2011-2012 Progress Report all rely on different data sources for enrollment figures at Levin High School.

Mr Grant's presentation cites information provided on New York State Education Department ("NYSED") report cards.<sup>8</sup> NYSED's enrollment counts are as of Basic Educational Data System ("BEDS") day, which is typically the first Wednesday of October of the school year. The SLT's presentation cites NYSED data as well, and also indicates that data was pulled from ATS<sup>9</sup> in mid-January 2013. The DOE, however, relies on audited register data to generate Progress Reports. The Progress Report data that was discussed at the joint public hearing was generated using the 2011-2012 audited register. The EIS describing this proposal, which was initially published on January 11, 2013, before audited register data for the 2012-2013 school year was available, relies on unaudited register data that was collected on October 26, 2012. As a result of these differing data sources, there are slight discrepancies between the enrollment information cited by Mr. Grant, the Levin High School SLT, the EIS, and the 2011-2012 Progress Report.

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<sup>7</sup> Any student from the 2009-2010 cohort who was placed in ninth, tenth, or eleventh grade this year is by default an over-age student and the SLT's reference to "placed by the District" is assumed to mean the student arrived at the school through OTC placement. The audited register currently shows 17 such students at Levin High School which matches the total indicated on the SLT PowerPoint presentation.

<sup>8</sup> The sources cited in Mr. Grant's presentation include:

<http://schools.nyc.gov/Accountability/data/GraduationDropoutReports/default.htm>, <https://reportcards.nysed.gov/files/2005-06/AOR-2006-320900011414.pdf>, <https://reportcards.nysed.gov/files/2008-09/AOR-2009-320900011414.pdf>, and <https://reportcards.nysed.gov/files/2010-11/AOR-2011-320900011414.pdf>

<sup>9</sup> Automate the Schools (ATS) is a school-based administrative system which standardizes and automates the collection and reporting of data for all students in the New York City Public Schools. It provides for automated entry and reporting of citywide student biographical data; on-line admissions, discharges, and transfers; attendance; grade promotion; pupil transportation and exam processing; and many other functions. In addition, it has a school-based management component that supplies aggregate student data, human resources data, and purchasing information for use by school administrators and school-based management committees.

The DOE makes every effort to ensure its data is accurate, 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.

Comments 2a, 7, 8, 9, 11, 16, 20a and 28 generally oppose the strategy of phasing-out schools to improve educational options for students. Comment 11 also contends that the DOE has not properly supported new schools created under the current mayoral administration, like Levin High School, which opened in 2001.

The phase-out intervention is part of the Children First reforms. The goal of these reforms is simple: 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, under this Administration, New York City has replaced 140 of our lowest-performing schools with better options and opened 590 new schools: 427 district schools and 163 public charter schools. As a result, the DOE has 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 new schools on the Erasmus campus are getting tremendous results, graduating 71.4% of students in 2011. The Erasmus Hall High School graduated only 40.3% of student in 2002. (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).

The DOE counts on each school to provide a high-quality education to its students and holds all schools to the same high standard. If a school isn’t getting the job done for its students, the DOE is compelled to take serious action to ensure students don’t fall even further behind.

The DOE cannot allow schools to keep failing kids 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.

Comments 1d, 2b, 5b, and 13 all object to the phase-out proposal based on the importance of preserving the Levin High School media program.

The DOE acknowledges that many students at Levin High School, including almost all who spoke at the public hearing, have been well-served by the enriching experiences offered through the media program at Levin High School. While a program like this is a great resource, the DOE must hold all schools accountable to the same high standards, regardless of what the focus of the educational program may be. Additionally, as described in the EIS, there are at least seven other high schools citywide that offer film and video programs, and five of these schools received an A or B on their last Progress Report.

Comments 4a and 21 take issue with the basis for the DOE's decision to phase-out Levin High School. Comment 4 references the fact that while Levin High School received an overall D grade on the latest Progress Report there are other schools across the city which received worse Progress Report grades that are not being proposed for phase-out. Comment 21 rejects the DOE's reliance on certain quantitative data in assessing the school's performance.

As discussed in the EIS, no single factor determines whether a school will phase out or not. The DOE relies on a wide range of data and on-the-ground information when identifying struggling schools and evaluating which interventions, if any, are needed to support school communities. In addition to Progress Report grades, the DOE considers Quality Review scores, graduation rates, school safety data, student performance trends over time, demand and enrollment trends over time, school culture and environment metrics, and survey response data. In addition to these metrics, the DOE has taken into account 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. Therefore, neither Progress Report grades nor particular quantitative metrics automatically determine whether phase-out is or is not the appropriate intervention for a school.

Comment 4c inquired why there were no proposals to close schools in Staten Island.

The DOE seeks to ensure that all students have access to high-quality educational options, regardless of where those students attend school. All DOE schools are evaluated using the same metrics and there is no minimum or maximum number of schools in any given district or borough that will be proposed for phase-out in any given year.

While there are no schools in Staten Island proposed for phase-out this year, P.S. 14 Cornelius Vanderbilt (31R014) was approved for phase-out during the 2011-2012 school year. The school is located at 100 Tompkins Avenue, Staten Island, New York 10304 within the geographical confines of District 31.

Comment 7 contends that the decision to phase-out Levin High School has already been made because the Mayor pays PEP members.

The PEP consists of 13 appointed members and the Chancellor. Each borough president appoints one member and the mayor appoints the remaining eight. The PEP members do not receive payment for their services (although they may receive reimbursement for travel expenses). While the DOE has determined that phase-out is the appropriate intervention for Levin High School, the proposal cannot be implemented

without the PEP's approval. The PEP has not yet voted on this proposal. Furthermore, this analysis of public comments will be provided to the PEP for its consideration prior to the vote on this proposal.

Comments 10a and 14 argue that the school should not be closed in order to preserve the memory of its namesake.

The DOE acknowledges the contributions that Jonathan Levin made as an educator and his significance to the Taft Campus community. Furthermore, to continue honoring his memory, the DOE is amenable to exploring the possibility of naming a classroom or specialized area of the Taft Campus, such as the media center, after Jonathan Levin, consistent with Chancellor's Regulation A-860.

However, the desire to preserve a school's name cannot override the need to implement an appropriate intervention, which in this case is phase-out.

Comment 12 asserts that the school is currently meeting the needs of its students.

As described in the response to comments 1a, 3, 4b, 5a, 10b, 15 and 24, the data indicates that Levin High School is not serving its students as well as many other high schools which enroll similar populations of students. Furthermore, after a comprehensive review of many quantitative and qualitative factors, the DOE has determined that phasing out and replacing the school is the most appropriate strategy for providing the community with better educational options.

Comment 25 inquires about the impact of budget cuts on student performance at Levin High School.

Levin High School's budget is determined in the same manner as all other schools across the City. In New York City, schools are funded through a per pupil allocation. That is, funding "follows" the students and is weighted based on students' grade level and need (incoming proficiency level and special education/ELL/Title I status). If a school's population declines, the school's budget decreases proportionally-just as a school with an increase in students receives more money. Even if the DOE had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls.

In light of this fact, it cannot be said that changes to Levin High School's budget have put the school at a disadvantage in terms of student performance as compared to any other school in the City.

Comment 17 cited Levin High School's "open door" nature as a reason to keep the school from phasing out.

To the extent that the commenter referred to the fact that Levin High School serves many ELL students and SWDs, please refer to the response to comments 1a, 3, 4b, 5a, 10b, 15 and 24 above. To the extent that the commenter referred to Levin High School's Educational Option admissions policy, it should be noted that many other high schools in the Bronx also exercise that admissions policy, including three other high schools in District 9 (09X412, 09X505, and 09X525). The Department must hold all schools accountable to the same high standard, regardless of how schools admit students. As a result, the maintenance of a given admission method should not be the basis for keeping a school open in spite of its ongoing struggles with student performance.

Comment 19 claimed that closing Levin High School would deprive students of the rights of education and freedom.

As discussed above, the DOE strives to provide students with quality educational options. After a thorough review, the DOE has concluded that Levin High School is not serving its students well, and that the community deserves, and will be better served by, a new school.

Comment 22 inquired as to whether or not any of the DOE officials present at the hearing had children who attended school in the Bronx.

Bronx High School Superintendent Carron Staple, a DOE official who was seated at the dais, has several children and step-children who attended schools in the Bronx for the entirety of their K-12 education.

However, having children attend school in a particular borough or district is not a prerequisite to understanding the struggles that a given school faces.

Comment 23 inquired about which schools students would attend if Levin High School closed.

As described in the EIS, Levin High School 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 at a time until it closes at the conclusion of the 2015-2016 school year. Current students will be supported as they progress towards graduation while remaining enrolled at Levin High School. 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 Levin High School completes phasing out.

After taking into account various proposed changes to schools in the Bronx (such as phase-outs, co-locations of new schools, enrollment reductions or increases and grade reconfigurations), there will be approximately 1,163 excess ninth grade seats in the borough in the 2013-2014 school year, which includes a net gain of 439 ninth grade seats in the borough.

Furthermore, the proposed changes will result in an increase in limited unscreened seats, which are available to all students, regardless of past academic history. This means that a wider set of options would be available to a greater number of students. These changes also represent an increase in the number of seats that would give priority to students residing in or attending school in the Bronx.

Finally, eighth-grade students will continue to have access to a broad range of high school options through the Citywide High School Admissions Process. These include many other Bronx high schools, some of which offer academic programs and pathways similar to those currently available at Levin High School. Detailed information about high schools is available at enrollment offices and online at: <http://schools.nyc.gov/ChoicesEnrollment/High/Publications>.

Appendix A of the EIS includes a list of schools in the Bronx with programs in the same interest area as the one currently offered at Levin High School, Film/Video.

Comment 26 cited Levin High School's positive impact on the campus culture at X410 as a reason why the school should not be phased-out.

As a product of scarce resources and demand for more options, roughly half of all DOE schools share space in a building with other organizations. Co-located school organizations are expected to use a collaborative approach to sharing space equitably and in a manner that promotes student achievement for all children in a given building.

The DOE must hold all schools to the same high standard, regardless of where those schools are located. While Levin High School may make valuable contributions to the campus culture at X410, the DOE does not expect that phasing out Levin High School will have a negative impact on the educational experiences of children attending any of the existing organizations in the X410 building. As discussed in the EIS, this proposal is not expected to impact academic or extracurricular program offerings or partnerships at any of the other schools in X410. Programs will continue based on student interests, available resources, and staff support for those programs. With respect to athletics, the Taft Campus schools will continue to field athletic teams collaboratively, with students from all schools in the building eligible to participate.

Comments 27 and 28 inquire about the feasibility of replacing the school's administration and whether there are other, less extreme alternatives to phasing the school out.

As noted in the response to comment 2, proposing a school for phase-out is the most difficult decision that the DOE makes. After conducting a comprehensive review of Levin High School, which included reviewing recent historical performance and demand data from the school, consulting with superintendents and other experienced educators who have worked closely with the school, and gathering community feedback, the DOE determined that only phase-out will address the issues faced by this school. The DOE does not believe that merely replacing the administration will result in the necessary improvement of educational options available to students and families in this community.

Comments 18 and 27 concern the supports offered to Levin High School.

In terms of supports, 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 EIS describing the proposal to phase-out Levin High School includes a list of leadership, instructional, operational, and student supports that were provided to the school, which was compiled by the school's network.

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

No changes have been made to the proposal.