

Public Comment Analysis¹

Date: March 8, 2013

Topic: The Proposed Opening and Co-location of New High Schools 25Q240 and 25Q241 with Flushing High School (25Q460) in Building Q460 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 two new district high schools, 25Q240 and 25Q241, in school building Q460 (“Q460”) located at 35-01 Union Street, Flushing, NY 11354 within the geographical confines of Community School District 25 (“District 25”). The proposed new high schools, 25Q240 and 25Q241, will offer rigorous academic programming that will prepare students for post-secondary education and careers. If this proposal is approved, 25Q240 and 25Q241 will be co-located in building Q460 with Flushing High School (25Q460, “Flushing”), an existing high school serving students in ninth through twelfth grade. In addition, building Q460 houses a Young Adult Borough Center (“YABC”) program and a Learning to Work (“LTW”) program. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias.

On February 14, 2013, the DOE issued an amended EIS that clarifies that the planned enrollment reduction will impact Flushing’s admissions priorities and not Flushing’s admissions methods, and provides updated information regarding the change in Flushing’s admissions priorities. The amended EIS also specifies changes to available ninth-grade seats at Flushing.

In consultation with the school’s leader, cluster, network support, and community, the DOE is planning to reduce the enrollment at Flushing over a period of four years beginning in September 2013. By 2016-2017, enrollment at Flushing will decrease by approximately 842-882 students so that it will serve 2,150-2,190 students at scale in ninth through twelfth grades. This reduction of Flushing’s enrollment will create space for 25Q240 and 25Q241 to open in building Q460 and grow to scale. The DOE does not anticipate reducing Flushing’s enrollment if this proposal to co-locate 25Q240 and 25Q241 is not approved.

The proposed opening and co-location of 25Q240 and 25Q241 in building Q460 is part of the DOE’s central goal to create new school options that will better serve future students and the community at large. 25Q240 will be open to students through the Citywide High School Admissions Process and will have a limited unscreened selection method giving priority to students residing in Queens. 25Q241 will offer Chinese bilingual programming in accordance with community need based on parent choice. The school will be open to New York City residents, with a priority to Queens students or residents. Fifty percent of the incoming ninth-grade students will be English Proficient students and fifty percent will be Chinese (Mandarin) speakers who are English Language Learners (“ELLs”) as per DOE guidelines.

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.

According to the 2011-2012 Enrollment Capacity Utilization Report (“Blue Book”), building Q460 has a target capacity of 2,031 students. In 2012-2013, the building serves approximately 3,032 students, yielding a building utilization rate of 149%.

If this co-location proposal is approved, 25Q240 and 25Q241 will gradually phase into Q460 while Flushing simultaneously scales back its enrollment. The new schools will serve students in ninth grade beginning in the 2013-2014 school year and will add one grade level every year until the schools reach their full grade span of ninth through twelfth grades in the 2016-2017 school year, each school serving approximately 420-460 students. In 2016-2017, once Flushing has completed its enrollment reduction and 25Q240 and 25Q241 have reached full scale, it is projected that there will be approximately 2,990-3,110 students served in Q460, yielding an estimated building utilization rate of approximately 147%-153%. Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation.

The details of this proposal have been released in an EIS which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm>. Copies of the EIS are also available in Flushing’s main office.

Summary of Comments Received

A joint public hearing regarding this proposal was held at building Q460 on February 28, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. While representatives from the Citywide Council for Special Education, Citywide Council on High Schools, and Citywide Council for English Language Learners were invited, not all chose to participate in the hearing. Approximately 150 members of the public attended the hearing and 22 people spoke. Present at the meeting were: Queens High Schools Superintendent Juan Mendez; District 25 Superintendent Danielle DiMango; Community Education Council (“CEC”) 25 representatives Kenneth Cohen II, Jacqueline Colson and Kim Montgomery; Magdelene Radovich, Principal of Flushing High School; School Leadership Team (“SLT”) representatives from Flushing, Jessica Dimech, Erin Flanagan, Patricia Cuti, John Doherty Jr. , Sheldon Minnus, Susan Sgambati, Agata Wudarczyk, Lorena Castro, Jorge Maldonado, Juan Lopez, and Diana Yi; Dmytro Fedkowsky, Queens Representative of the Panel for Educational Policy; Joshua Goodman representing State Senator Toby Ann Stavisky; Don Capalbi representing Congresswoman Grace Meng; Kevin Ryan representing Council Member Daniel J. Halloran; and Amanda Cahn and Jillian Roland from the Office of Portfolio Management.

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

1. CEC 25 Representative, Kenneth Cohen II, spoke against co-locations and asserted the following:
 - a. He asserted the CEC’s position against co-locations.
 - b. There will ultimately be a struggle for space as schools grow.
 - c. Instead of co-locating schools in one building, the DOE should build another school building.
 - d. It is unfair to the borough to open a school that caters to one group of students. The DOE should be held accountable for making a better English Language Learner program so that all students in the City’s public schools have equal opportunities.
2. Flushing SLT Representative, Jessica Dimech, expressed her opposition to the proposed co-location:

- a. She referenced different reforms the DOE has attempted for Flushing, including the formation of Small Learning Communities, transformation, and turnaround, stating that this frequent change negatively impacts the school.
 - b. She expressed support for the current leadership and asked that the DOE support positive change in the school.
 - c. She stated that co-location will negatively impact students and the school environment.
 - d. She asserted her position against the co-location proposal.
3. Flushing SLT Representative, John Doherty Jr., expressed his opposition to the proposed co-location:
 - a. He asserted that co-locations cause tribalism and fighting between students, citing safety issues at high school campuses throughout Queens.
 - b. He stated that Flushing is overcrowded and that the proposal will increase the number of students in the building as the building utilization grows from 149% to 153% utilization.
 - c. He expressed concerns about security stating that there would only be a certain number of security guards and three different administrations to report to.
 - d. He cited other campuses in Queens with co-locations asserting that the DOE does the same thing over and over and expects different results.
4. Flushing SLT Representative, Diana Yi, expressed her opposition to the proposed co-location:
 - a. She expressed concerns about the negative impact of the proposed co-location and frequent change on student morale.
 - b. She stated that significant changes impact the current principal's ability to build Flushing's relationship with the community, and asserted that the DOE should let the community have a chance to work with the new principal to build a school that reflects this community.
 - c. She stated that the principal will not have the capacity to address college and career readiness if she has the added responsibility of co-location.
 - d. She stated that there has been positive change in the building and cited the development of the school's College and Career Pathway Center.
 - e. She expressed concerns about the new school, 25Q241, stating that the school focuses on a particular group in the community, and that this divides the community.
5. Flushing SLT Representative, Erin Flanagan, expressed her opposition to the proposed co-location:
 - a. She stated that Flushing would receive less funding as its enrollment decreases over the next four years.
 - b. She stated that Flushing would have to transition each year for the next four years as the school's enrollment declines.
 - c. She expressed concern about the negative focus of the EIS, stating that the Progress Report does not reflect student progress.
 - d. She expressed concern about the shared gym, asking why Flushing would need to share gym space and whether the DOE intends to build additional gyms in the building?
 - e. She expressed concern about the negative impact of the proposed co-location on the school community and programming.
 - f. She stated that the school has been improving under its current leadership and should be given time to continue to improve.
6. A representative of the Flushing SLT expressed his opposition to the proposed co-location:
 - a. He expressed concern that the DOE has forced many changes on Flushing.
 - b. He expressed concern that the proposed co-location will make the school more overcrowded.

- c. He expressed concern that the proposed co-location will negatively impact the school's environment because students will have to report to three times as many administrators.
 - d. He asserted his opposition to the proposed co-location.
7. Dmytro Fedkowsky, Queens Representative of the Panel for Educational Policy, expressed his opposition to the proposed co-location:
 - a. He asserted his and the Queens Borough President Helen M. Marshall's opposition to the proposed co-location.
 - b. He expressed concerns about the long-term impact of the proposal, stating that Flushing needs the time, resources and space to improve.
 - c. He stated that, during early engagement, he never heard a request for two more schools in the building but instead requests for DOE support, funding and educational models for long-term gains.
 - d. He expressed concerns that there is not space to share in the building and the proposed co-location does not decrease capacity.
 - e. He expressed concerns that the proposed co-location has the potential to impact the YABC and LTW program in the building, as well as the other educational option programs in the building.
 - f. He announced his co-sponsored resolution for a moratorium on school closure, phase-out, and co-location proposals.
8. A Representative from State Senator Toby Ann Stavisky's Office read prepared remarks on behalf of the Senator:
 - a. He cited the history of reforms including transformation, turnaround and early engagement, and the fact that the school has had three administrators in three years.
 - b. He cited ways Flushing has improved, including a steady graduation rate and a partnership with Asian American Students for Equality, and asserted that the school has improved despite the DOE's attempted reforms.
 - c. He expressed concern that resources will be spent on two new administrations and not on students, and requested that the DOE not spend public money on new administrations.
 - d. He expressed concerns about overcrowding in the building, and that space would be taken away from students.
 - e. He asked that the DOE give Flushing the ability to succeed.
9. Multiple commenters expressed concern about the impact of Flushing's enrollment reduction on the teaching staff and resources.
10. Kenneth Cohen of the NAACP expressed his opposition to the proposed co-location:
 - a. He asserted that the co-location will take over shared spaces including the library, gym and cafeteria.
 - b. He expressed concern about the new school, 25Q241, stating that a school cannot be limited to population and dialect, and that this is working backwards from the Brown v. Board of Education decision to provide a quality education for all children.
 - c. He asserted his opposition to the proposed co-location.
11. Multiple commenters expressed general opposition to the proposed co-location.
12. Multiple commenters expressed concern about overcrowding in the building:
 - a. Some commenters expressed concern about overcrowding in shared spaces and hallways.
 - b. Some commenters expressed concern about a shortage of classrooms.
 - c. Some commenters expressed concern about a building utilization rate above 100%.
 - d. Some commenters expressed concern about a triple-session schedule, including when students eat lunch and attend gym, as well as early starting and late ending times.

13. Multiple commenters expressed concern about the safety of co-locating high schools in the same building.
14. Multiple commenters expressed concern about the negative impact of the co-location on school environment and student morale.
15. Multiple commenters expressed concern about the impact of the proposed co-location on Flushing high school's success, and some asked for evidence of successful co-locations.
16. A commenter expressed concern about the impact of the enrollment reduction on CTE programming, citing the successes of the Academy of Business Entrepreneurship.
17. Some commenters expressed confusion about why the DOE is proposing to co-locate two district high schools in the building.
18. A commenter expressed concern that the parent letter was only in English even though one of the proposed new schools serves 50% English Language Learners.
19. Multiple commenters cited the different reforms the DOE attempted for Flushing.
20. Multiple commenters asked that the DOE build schools to address overcrowding in Queens, and one stated that there has not been a new high school building in the neighborhood.

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

21. Assembly Woman Catherine Nolan submitted a letter expressing opposition to reducing the enrollment at Flushing:
 - a. She referenced her opposition to turnaround.
 - b. She expressed her support for comprehensive high schools, stating that the comprehensive high school experience is undervalued.
 - c. She asserted that reducing the enrollment and therefore resources at Flushing is not a good plan.
22. Former Council Member Melinda Katz submitted a letter expressing the following concerns:
 - a. Reducing the enrollment at Flushing will reduce funding and necessary resources for Flushing.
 - b. Flushing has improved and burdening it with a co-location is not a good plan.
 - c. Charter schools cannot come at the expense of space or limited resources dedicated to public schools.
23. State Senator Jose R. Peralta submitted a letter expressing opposition to the proposed co-location:
 - a. He noted Flushing's progress in the face of challenges.
 - b. He expressed concern that the DOE fails to help the school cope with overcrowding.
 - c. He expressed concern that the DOE fails to help the school cope with instability resulting from the threat of closure.
 - d. He expressed concern that a neighborhood school would be dismantled and the new schools would accept students from far and wide.
 - e. He stated that Queens needs more schools.

The DOE received a number of comments which do not directly relate to the proposal. Those comments are summarized below.

24. Multiple commenters expressed opposition to Mayor Bloomberg and his policies.
25. A commenter stated that charter schools should not receive public funds.
26. A commenter expressed support for English as a Universal Language and his opposition to using public resources to translate materials.

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

- Comments 1a, 2d, 6d, 7(a, f), 10c, and 11 express general opposition to the proposed co-location; comment 17 concerns the rationale for the proposed co-location; and comments 2c, 3d, 4a, 5e, 14, 15, and 22b concern the perception that co-locations negatively impact a school's success and student morale.

The DOE works to ensure that students and families in every community have high-quality educational options. In an effort to increase choice and access to high-quality educational options, but due to space limitations, roughly half of our schools share space in a building. Co-locations allow us to use our limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because we have scarce resources and a demand for more options. Many school buildings successfully house co-located schools. Examples in Queens include the Springfield Gardens Campus which houses four high schools, three of which received "A" or "B" on their progress report grade for the 2011-2012 school year; the Jamaica High School Campus which houses two high schools that received an "A" on their 2011-2012 progress report and two high schools that are currently phasing in and do not yet have progress report grades; the Middle College Campus which houses two high schools that received an "A" and a "B" on their 2011-2012 progress reports; and Queens High School Complex, Q735 which houses three A-rated schools according to their 2011-2012 progress reports. Principals across the city have collaborated to meet the needs of all students served in their buildings.

At this time, the DOE believes that reducing the enrollment of Flushing beginning in September 2013 and providing two new options for high school students in the Q460 building will benefit current and future students at Flushing and in Queens. The enrollment reduction is intended to provide an opportunity for Flushing to improve by narrowing its focus to fewer academic programs and a smaller number of students, and allow for new school options to develop in building Q460.

For the 2012-2013 school year, 18,260 ninth-grade seats were available in Queens. A total of 18,513 new ninth-grade students are enrolled in Queens high schools in 2012-2013, leaving a deficit of 253 seats. This co-location proposal is intended to provide additional options to current and future students in Queens without increasing the deficit of high school seats in Queens. Thus, the DOE intends to preserve the number of high school seats offered to the Flushing community and to students in Queens by reducing Flushing's enrollment as the new schools phase into the building.

In reference to the comment about the impact of this proposal on school culture, the DOE has confidence in the abilities of both Flushing and the new schools to create strong cultures supportive of student progress and high quality performance. The DOE understands the emotions involved in the prospect of changes to a long-standing school and that Flushing is considered a home and community for all of its stakeholders. However, as noted above, the DOE believes the enrollment reduction will benefit Flushing students. Additionally, many DOE schools are successfully co-located and Building Councils are established to allow school leaders to collaborate in sharing common space, facilitating administrative decision-making and ensuring that all schools in a building operate smoothly and safely.

- Comments 1b, 3b, 5d, 6b, 7d, 8d, 10a, 12(a, b, c, d), and 23b concern overcrowding and available space, including concerns about scheduling and shared common spaces such as the library, gymnasiums, and cafeteria.

There are currently hundreds of schools in buildings across the City that are co-located. In all cases, allocation of classroom, resource, and administrative space is guided by the Citywide Instructional Footprint (the “Footprint”) which is applied to all schools in the building.

The DOE seeks to fully utilize all its building capacity to serve students. In all cases, the DOE seeks to provide high quality education and allow parents/students to choose where to attend school.

The Footprint is the guide used to allocate space to all schools based on the number of class sections the school programs and the grade levels of the school. The number of class sections at each school is determined by the Principal based on enrollment, budget, and student needs; there is a standard guideline of target class size (i.e., number of students in a class section) for each grade level. At the middle school and high school levels, the Footprint assumes every classroom is programmed during every period of the school day except one lunch period. The full text of the Instructional Footprint is available at http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

As mentioned in the EIS, currently, building Q460 is overcrowded and does not have enough space pursuant to the Citywide Instructional Footprint (the “Footprint”). Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation, as described below.

Flushing currently manages its overcrowding by serving students on split-schedules so not all students are in the building at the same time. This means that the school operates a longer school-day than usual. For example, many high schools operate on a schedule that contains eight periods in the day. Flushing, however, operates on a schedule that contains ten periods in the day, or 25% more time. Students are in school for only eight periods, i.e. from first to eighth periods, from second to ninth periods, or from third to tenth periods. Split-scheduling enables the same number of classrooms to meet the instructional space needs of a larger number of students. The proposal to co-locate 25Q240 and 25Q241 in building Q460 is not anticipated to increase the number of students in the building at any given year above current practice, as Flushing’s enrollment will decrease as the new schools phase into the building. If this proposal is approved, building Q460 may continue to program on split-schedules or in different ways than the standard assumptions to continue to accommodate approximately the same number of students as it currently serves.

Queens high schools, and many high schools throughout the city, have successfully served students in buildings with a utilization in excess of 100% by efficiently scheduling classes through additional periods and split-schedules. Some examples include Forest Hills High School and Francis Lewis High School in Queens, which each operate on more than one session and have received “A” and “B” progress report grades every year, with each receiving an “A” grade for the 2010-2011 and 2011-2012 school years.

If this co-location proposal is approved, although the building will continue to operate above 100% capacity and 25Q240, 25Q241, and Flushing will be under Footprint (i.e. Flushing's actual allocation will be less than the school's baseline Footprint allocation), the schools will be able to use all building resources to meet the needs of students throughout the period while Flushing's enrollment is reduced and 25Q240 and 25Q241 phase in.

Specific decisions regarding the allocation of the shared spaces will be made by the Building Council, consisting of principals from all co-located schools, in conjunction with the DOE's Office of Space Planning. The proposal to co-locate 25Q240 and 25Q241 in building Q460 is not anticipated to increase the number of students in the building at any given year above current practice, and thus common spaces in the building will continue to serve approximately the same number of students. The Office of Space Planning will also work with Flushing to ensure a smooth transition, if necessary, of any rooms currently being used by Flushing.

- Comments 3(a, c) and 13 concern the safety of co-locations.

As mentioned above, there are hundreds of schools in buildings across the City that are co-located.

Pursuant to Chancellor's Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. In this case, the schools in building Q460 would develop a safety and security plan for Q460 prior to the first day of school in September 2013. The School Safety Plan is updated annually by the Committee to meet changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures

As mentioned in the EIS, the DOE makes available the following supports to schools relating to safety and security:

- Providing "Best Practices Standards for Creating and Sustaining a Safe and Supportive School," as a resource guide;
 - Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
 - Providing technical assistance via the Borough Safety Directors when incidents occur;
 - Providing professional development and support to Children's First Network (CFN) Safety Liaisons;
 - Providing professional development and kits for Building Response Teams; and
 - Monitoring and certifying School Safety Plans annually.
- Comments 4c and 6c concern the perception that there is an added administrative burden for schools that are co-located.

The proposal is to co-locate two separate schools in the Flushing High School building. If this proposal is approved, students would be supervised by only their school administrators, and not

administrators from three separate schools. Students at Flushing will only be supervised by Flushing administrators.

Additionally, the enrollment reduction is intended to provide an opportunity for Flushing to improve by narrowing its focus to fewer academic programs and a smaller number of students. This may allow the administration to have more time to focus on college and career readiness initiatives.

- Comments 1c, 20, and 23e concern the construction of new school buildings.

As mentioned in the [Five-Year Capital Plan](#), the School Construction Authority's (SCA) capital planning process has continued to include an annual review of our system's needs. In this era of severely constrained finances, the Department is faced with a growing student population and an aging infrastructure. Given the current economic conditions, needs must be prioritized to ensure the most critical issues are addressed first. The Department and the SCA annually undertake a comprehensive assessment of alternatives to address the need to balance the City's severe economic conditions with the projected growing demand for public school education. Realignment strategies such as increasing the utilization of existing facilities, grade truncations and adjustments to local school zones are some of the tools identified to achieve the most efficient use of our existing buildings. Additionally, co-locations allow us to use our limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because we have scarce resources and a demand for more options.

The above strategies and construction of new facilities are designed to address the most critical existing and anticipated capacity needs with priority given to existing overcrowding at the neighborhood or district level.

For the 2013-2014 school year, there will be two new high school buildings in Queens, Q404 in District 30 and Q636 in District 27, which will add some necessary high school capacity to the borough.

- Comments 1d, 4e, and 10b concern the focus of the new school, 25Q241.

The DOE strives to ensure that all students in New York City have access to a high-quality school at every stage of their education. The co-location of 25Q240 and 25Q241 in building Q460 is intended to provide additional options to students and families in District 25 and in Queens. Based on community feedback that there is a need for Chinese bilingual programming in Flushing, and based on the fact that approximately one-fifth of Flushing's population, or approximately 550 students attending Flushing, are ELLs, the DOE is proposing to co-locate 25Q241 in Q460. The percentage of ELLs at Flushing is slightly above the district, borough and city averages.

The proposed new school, 25Q241, will offer Chinese bilingual programming in accordance with community need based on parent choice. Admission to 25Q241 will serve approximately 420-460 students at scale and will be open to New York City residents, with a priority to Queens students or residents. Fifty percent of the incoming ninth-grade students will be English Proficient students and fifty percent will be Chinese (Mandarin) speakers who are ELLs as per DOE guidelines.

Thus, the proposed new school will offer a smaller setting for both ELLs and English Proficient students.

In the 2011-2012 school year, only 39% of ELL students at Flushing graduated in four years, which puts the school in the bottom third as compared to other schools in Queens. In contrast, there are successful high schools Citywide that offer Chinese dual language or transitional bilingual programs, such as the High School for Dual Language and Asian Studies in Manhattan, which received an “A” progress report grade for the 2011-2012 school year, and graduated 84% of its ELLs in four years, and Francis Lewis High School in Queens, which received an “A” progress report grade for the 2011-2012 school year, and graduated 74% of its ELLs in four years.

The DOE works to ensure that families have access to high quality educational options, and the DOE believes that providing this new option for high school students will benefit current and future students at Flushing and in Queens.

- Comments 2a, 4b, 5b, 6a, 8a, 19, and 23c concern the impact of change on Flushing; comments 2a, 8a, and 19 reference the history of performance-related proposals for Flushing.

Flushing has struggled to meet performance targets for several years. In 2011, the DOE applied to the SED to place the school into the Transformation model, one of the four federally-approved intervention models. Based on later evidence that the school was not equipped to significantly improve student performance, in April 2012, the Panel for Educational Policy voted to implement the closure and replacement of Flushing. A lawsuit prevented the DOE from following through with those plans.

While the DOE acknowledges that Flushing High School has a history of performance-related interventions, Flushing has not demonstrated the ability to dramatically improve student achievement and thus has been a continued focus for the DOE. The school received overall D grades on its Progress Reports in 2010-2011 and 2011-2012, after receiving a C in 2009-2010. Additionally, in 2011-2012, the school received F grades in both Student Progress and Student Performance, a D grade in School Environment, and a C grade in College and Career Readiness. Flushing was also identified by the New York State Education Department (“SED”) as a Priority school, defined by SED as one of the bottom 5% of schools in the state. In August 2012, SED identified Priority schools across the State, including 122 in New York City. High schools are identified as Priority based on the school’s graduation rate.

As a result of Flushing’s continued poor performance, the DOE initiated a comprehensive review of Flushing in the fall of 2012, with the goal of determining what intensive supports and interventions would best benefit its students and the Flushing community. During that review, the DOE looked at recent historical performance and demand data from the school, consulted with superintendents and other experienced educators who have worked closely with the school, and gathered community feedback.

After reviewing its performance after implementing Transformation, considering input from the school community, and examining the school in context to its district, the DOE has decided not to phase out Flushing High School at this time.

Instead, the school will develop a School Comprehensive Educational Plan with a supplemental plan indicating school improvement efforts that follow federal school turnaround principles. This proposal will satisfy NYSED requirements for Priority schools not undergoing a specific intervention model. We will continue to carefully monitor Flushing High School this year and re-visit its progress next fall.

Additionally, at this time, the DOE believes that reducing the enrollment of Flushing beginning in September 2013 and providing two new options for high school students in the Q460 building will benefit current and future students at Flushing and in Queens. The enrollment reduction is intended to provide an opportunity for Flushing to improve by narrowing its focus to fewer academic programs and a smaller number of students, and allow for new school options to develop in building Q460.

Flushing will still have 2,150-2,190 students by the end of its enrollment reduction, and this is a sufficient size to continue offering a wide array of academic offerings. Additionally, Flushing will continue to offer its academic programs and SLCs. This proposal is not expected to significantly change Flushing's ability to program as it currently does.

- Comments 2b, 4d, 5(c, f), 7b, 8(b, e), and 23a express support for Flushing under its current leadership, citing ways the school has improved and asking for time and resources to improve.

All schools receive support and assistance from their superintendent and their [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.

Over the past several years, the DOE has provided numerous supports to Flushing High School. Among those supports are:

- Working with the principal to develop strong leadership skills;
- Providing strategies for engaging students in rigorous assignments that will prepare them for success in future educational and professional pursuits;
- Working to improve classroom instruction by giving teachers feedback that is aimed at strengthening their practice and providing professional development aligned with the Common Core Standards;
- Recommending effective ways to organize the school;
- Providing operational support for budget, enrollment, facilities, transportation, and health, among other areas, to allow school leadership to maximize support for student learning;
- Helping the school to improve the learning environment and develop a culture that supports safety, respect, and socio-emotional development; and
- Supporting the school in developing and maintaining strong ties to the community.

While the DOE recognizes that Flushing staff members have worked hard to improve the school, even with support, the school has not produced adequate outcomes for students.

As mentioned above, after reviewing its performance after implementing Transformation, considering input from the school community, and examining the school in context to its district, the DOE has decided not to phase out Flushing High School at this time. The enrollment reduction is intended to provide an opportunity for Flushing to improve by narrowing its focus to fewer academic programs and a smaller number of students. We owe it to our families to give them the best possible options.

- Comments 5a, 8c, 9, 21c, and 22a concern the impact of the proposal on Flushing’s funding, enrollment and teaching staff.

As mentioned above, Flushing’s enrollment reduction is intended to provide an opportunity for Flushing to improve by narrowing its focus to fewer academic programs and a smaller number of students, and allow for new school options to develop in building Q460.

In New York City, we fund schools through a per pupil allocation. That is, funding “follows” the students and is weighted based on students’ grade level and need (incoming proficiency level and special education/ELL/Title I status). If a school’s population declines from 2,500 to 2,100 students, the school’s budget decreases proportionally—just as a school with an increase in students receives more money. Even if the Department of Education had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls.

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

It is important to note that Flushing will still have 2,150-2,190 students by the end of the enrollment reduction. This is a sufficient size to continue offering a wide array of academic offerings.

Fair Student Funding (FSF) dollars – approximately \$5.0 billion in the 2012-2013 school year based on projected registers – are used by all district schools to cover basic instructional needs and are allocated to each school based on the number and need-level of students enrolled at that school. All money allocated through FSF can be used at the principals’ discretion, such as hiring staff, purchasing supplies and materials, or implementing instructional programs. As the total number of students enrolled changes, the overall budget will increase or decrease accordingly, allowing the school to meet the instructional needs of its student population. In addition to the FSF student-need based dollars a school receives, all schools receive a fixed lump sum of \$225,000 in FSF foundation and \$50,000 in Children First Network Support to cover administrative costs.

New schools receive Fair Student Funding in the same manner as other schools. Funding follows the students and is based on pupil academic needs (i.e., special education, ELL, poverty, and/or proficiency status).

New district schools are provided with additional funds to cover start-up costs such as supplies and textbooks that may be required. This Other than Personal Services (OTPS) for new schools funding allocation is based on a fixed per-school amount, and a per-pupil allocation. A new school in year one of implementation at a newly constructed site will receive \$22,000 and a new school in a newly leased or existing site will receive \$51,000 in OTPS per school. Thereafter, the school will receive \$100 per-student in OTPS based on projected registers for the newly added grade. In the case where there is no new grade phasing-in, the school will not receive an allocation in that year.

Principals have discretion over their budget and make choices about how to prioritize their resources. New schools may choose to hire fewer administrative staff (e.g. only a single assistant principal) freeing up dollars to be directed toward other priorities.

As student enrollment at Flushing declines, the school's staffing needs may be reduced. All excessing would be conducted in accordance with existing labor contracts. For example, the current UFT contract would require excessing to take place in reverse seniority order within each given teaching license area. Barring system-wide layoffs, excessed teachers would be eligible to apply for other City positions, and any teachers who did not find a permanent position would be placed in the Absent Teacher Reserve ("ATR") pool, meaning that they would continue to earn their salary while serving in the capacity of a substitute teacher in other City schools. Should there be a vacancy in the school in a teacher's license area within one year of the teacher being excessed, the teacher would have a right of return to the school, consistent with applicable contractual provisions regarding teachers' seniority.

- Comment 7c concerns early engagement and community feedback.

Consistent with last year's approach and the DOE's desire to incorporate school and community input in the decision-making process, in October and November the DOE had conversations with 47 struggling schools (41 district schools and 6 public charter schools) that were eligible for an intensive support plan or intervention. In these conversations the DOE shared information about school performance and talked with the community about their reflections of the school's strengths and weaknesses. This engagement is above and beyond what is mandated by State law.

The goal for these engagement meetings was to begin or renew conversations with schools and their communities about their performance and the resulting actions the DOE may take to improve it. The DOE gathered feedback – to understand what's working, what's not working, and what the community has to say about it – before making a decision about whether the school should be given intensive support or phased out and replaced with a new option that can support student success.

Superintendents met with the school leadership team, staff and parents to explain the DOE's thinking on why the school is considered struggling and what particular factors show this to be the case.

The DOE also distributed reports for each school that summarized school performance, school supports, and potential action steps. These are easy-to-understand summaries that were handed out at feedback meetings and are posted on the DOE's website.

Again, all of this happened prior to a decision about whether a school will be proposed for phase out or middle school truncation.

After reviewing its performance after implementing Transformation, considering input from the school community, and examining the school in the context of its district, the DOE has decided not to phase out Flushing High School at this time. Instead, the school will develop a School Comprehensive Educational Plan with a supplemental plan indicating school improvement efforts that follow federal school turnaround principles. This proposal will satisfy NYSED requirements for Priority schools not undergoing a specific intervention model. The DOE will continue to carefully monitor Flushing High School this year and re-visit its progress next fall.

Additionally, at this time, the DOE believes that reducing the enrollment of Flushing beginning in September 2013 and providing two new options for high school students in the Q460 building will benefit current and future students at Flushing and in Queens. The enrollment reduction is intended to provide an opportunity for Flushing to improve by narrowing its focus to fewer academic programs and a smaller number of students, and allow for new school options to develop in building Q460.

- Comment 18 concerns translations of the documents regarding the proposal.

Spanish translations of the hearing notices were provided prior to the joint public hearing and translations of the Educational Impact Statement were provided at the joint public hearing. A Spanish translation of the EIS is available on the DOE's Web site at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.htm>. Additionally, both Spanish translators and Mandarin translators provided translation services at the joint public hearing.

- Comments 7e and 16 concern the impact of the co-location on the YABC, LTW program, CTE, and educational option programs in the building; comment 21b expresses support for comprehensive high schools.

As mentioned in the EIS, there is no anticipated impact on the YABC or LTW program as a result of this co-location proposal. The YABC program is expected to remain in building Q460 and will continue to provide services as long as there is a need and demand for the program.

Flushing currently offers a zoned program and three educational option programs: the Academy of Business Entrepreneurship, Thurgood Marshall Law Academy, and the Academy of Health Sciences. This proposal is not expected to impact seats in these programs for current students.

Additionally, as mentioned in the EIS, the DOE is working closely with the Flushing leadership to gradually decrease the school's enrollment by approximately 842-882 students over a period of four years. The enrollment reduction will reduce the number of seats offered in the Academy of Business Entrepreneurship program, and create a seat target for the zoned program.

As total enrollment at Flushing declines throughout the course of the enrollment reduction, the school may need to adjust its CTE programming. It is difficult to predict how changes might be implemented, as decisions will rest with school administrators and will be based on student demand as well as staff and budget conditions at the school. Flushing's enrollment reduction may result in a reduction in the number of ninth-grade students accepted into its CTE programs. However, the school will still have 2,150-2,190 students by the end of the enrollment reduction, which should allow the school to continue offering the same array of CTE programming. It is expected that students currently enrolled in CTE programs at Flushing will continue to be served in those programs.

Flushing will still be of sufficient size to continue offering a wide array of academic offerings. Flushing will continue to offer extra-curricular programming based on student interests, available resources, and staff support for those programs. Students will continue to have the opportunity to participate in a variety of extra-curricular programs, though the specific programs offered at a given school are always subject to change. That is true for any City student as all schools modify extra-curricular offerings annually based on student demand and available resources.

- Comment 23d expresses concerns about the admissions methods of the new schools.

In New York City, high school admission is based on a Citywide choice process, with students ranking up to 12 high school programs in order of preference.

Flushing admits students to three programs, the Academy of Business Entrepreneurship, Thurgood Marshall Law Academy, and the Academy of Health Sciences, each through an educational option admissions method. Educational option programs are designed to attract a wide range of academic performers. Each program has a certain proportion of seats reserved for students with high, middle, and low reading levels. From the applicant pool, half of the students matched are selected from those ranked by the school's administration and the other half is selected randomly. If a student scores in the top 2% on his or her previous year's English Language Arts reading exam and lists an educational option program as his or her first choice, he or she would be guaranteed a match to that program.

Flushing also admits students through a zoned admissions method. A zoned admissions method provides a priority to students living within a specified zone. A student's zoned school is determined by his or her home address. For more information about school zoning and admissions processes for zoned schools, please visit the DOE Web site's School Search function at: <http://schools.nyc.gov/schoolsearch>.

As mentioned in the EIS, the DOE is working closely with the Flushing leadership to gradually decrease the school's enrollment by approximately 842-882 students over a period of four years. The enrollment reduction will reduce the number of seats offered in the Academy of Business Entrepreneurship program, and create a seat target for the zoned program. At this time, the DOE anticipates that the zone for Flushing will remain intact. However Flushing would not provide a guaranteed seat to zoned students who apply to the zoned program. To offset this change, beginning in September 2013, Flushing's zoned and educational option programs would give priority to students living within the Flushing zone. This would allow the DOE to monitor the enrollment in building Q460 and promote smaller learning environments while continuing to provide a priority to students living in the zone. The DOE anticipates that Flushing will be able to accommodate all of the zoned students who apply to Flushing.

If this proposal is approved, 25Q240 will admit students through the High School Admissions Process and through the over-the-counter (“OTC”) admissions process. The school will admit students through a limited unscreened admissions method, with a priority for students residing in Queens. Limited unscreened schools give admissions priority to students who demonstrate interest in the school by attending an information session, open house event, or visiting the school's exhibit at any one of the High School Fairs. Admission to 25Q241 will be open to New York City residents. Fifty percent of the incoming ninth-grade students will be English Proficient students and fifty percent will be Chinese (Mandarin) speakers who are ELLs as per DOE guidelines. Priority will be given to Queens students or residents.

- Comments 21a, 22c, 24, 25, and 26 do not directly relate to the proposal and do not require a response

Changes Made to the Proposal

No changes have been made to this proposal.