



Public Comment Analysis

Date: April 27, 2011

Topic: The Proposed Phase-out of P.S. 30 (28Q030)

Date of Panel Vote: April 28, 2011

Summary of Proposal

P.S. 30 Queens (28Q030, “P.S. 30”) is a zoned elementary school located at 126-10 Bedell Street, Jamaica, NY, 11434, in Community School District 28, in Building Q030 (“Q030”). It currently serves students in kindergarten through fifth grade and offers a pre-kindergarten program. The New York City Department of Education (“DOE”) is proposing to phase out and eventually close P.S. 30 based on its poor performance and the DOE’s assessment that the school lacks the ability to turn around quickly to better support student needs.

If approved, P.S. 30 would no longer admit kindergarten students or offer grades one and two or its pre-kindergarten program after the conclusion of the 2010-2011 school year. Current students in grades two, three, and four will continue to be served by P.S. 30 and be supported as they progress toward completion of elementary school at P.S. 30 and in the application process to middle school via the District 28 Middle School Choice Process. Current students in grade five will be supported in participating in the District 28 Middle School Choice Process consistent with current practice.

Beginning in the 2011-2012 school year, after grades K, 1 and 2 are phased out, P.S. 30 will serve one grade fewer each subsequent year until it completes its phase-out in June 2014. Students in grades K-2 would be served in a new zoned elementary school, P.S. 354 (28Q354, “P.S. 354”), to be opened in Q030 and proposed in a separate Educational Impact Statement (“EIS”). A pre-kindergarten program would also be offered by P.S. 354 in Q030 (pending continued funding availability).

In 2009-2010, Q030 had a target capacity to serve 733 students, and the building enrolled 578 students in pre-kindergarten through fifth grade, yielding a target building utilization rate of 79%. The school currently enrolls 565 students in grades K-5 and offers 18 seats of a full-day pre-kindergarten program. The target building utilization rate for Q030 in the 2010-2011 school year is 80%, including pre-kindergarten. This means that the building is “under-utilized” and has extra space to accommodate additional students.

The DOE initially published an EIS describing the proposal to phase-out P.S. 30 on December 16, 2010, which subsequently was amended on January 26 and 28, 2011. The joint public hearing on this proposal was scheduled to be held on January 27, 2011 at P.S. 30. However, because all New York City public schools were closed on January 27 due to inclement weather, the hearing did not take place. Despite the DOE's attempts to re-schedule the hearing within the time frame prescribed by applicable statutes and regulations, the P.S. 30 community was not able to come to an agreement on such a date.

The DOE re-filed the EIS on March 4, 2011 and held a joint public hearing on April 14, 2011.

In a separate EIS also posted on December 16, 2010, amended on January 26 and 28, 2011, and re-filed on March 4, 2011, the DOE is proposing the co-location of P.S. 354, a new zoned elementary school in Q030, which will serve grades K-5 when fully phased in, as well as offer a pre-kindergarten program.

The details of this proposal have been released in an Educational Impact Statement which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Apr282011Proposals>. Copies of the EIS are also available in the main office of P.S. 30.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at P.S. 30 on April 14, 2011. At the hearing, interested parties had an opportunity to provide input on the proposal. Approximately 150 members of the public attended the hearing, 21 people spoke, and 25 questions were submitted. Present at the meeting were: Deputy Chancellor Marc Sternberg; District 28 Community Superintendent Beverly Ffolkes-Bryant; District 28 Community Education Council representative Kathryn Thome; P.S. 30 School Leadership Team representatives Regina A. Baker, Christina Fareri-Ortiz, Ellen Klinger, Tareeka Kelly, and Sandra Farrington; and Deputy Director of Public Affairs Jenny Sobelman. Council Member Ruben Wills, Assemblywoman Vivian E. Cook, and a representative from Council Member Leroy Comrie's office were also present at the hearing.

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

1. P.S. 30 PTA President Tareeka Kelly thanked members of the P.S. 30 community for their support organizing and participating at the hearing. She read aloud a letter that was sent to the Panel for Educational Policy, former Chancellor Cathie Black, and Gentian Falstrom from the Office of Portfolio Planning, which stated:
 - a. The community is concerned about the proposed phase-out of P.S. 30. It is a "band-aid" solution, and the community is unsatisfied. Closing P.S. 30 is a mistake.
 - b. While the community supports higher expectations for its students, the existing students will remain under a school administration that the DOE has said is failing them. The DOE has not given the community sufficient reason to trust the proposed phase-out.
 - c. The community has expressed concerns and needs that have been ignored by the DOE. The community feels "cheated" and ignored.

- d. The DOE has not explained how the new school will be different from the existing school.
- e. Instead of phasing out and replacing P.S. 30, fiscal resources should be redirected for a better P.S. 30.
- f. Phasing out P.S. 30 will impact children, parents, and community members, and it will create a stressful environment for students.

In addition, Ms. Kelly added the following:

- g. The challenge of bringing Smartboards into the school demonstrates the way that the DOE does not address concerns of parents and staff.
 - h. The process for assessing which schools are failing is flawed. Ms. Kelly cited I.S. 72, which provides transfers pursuant to the No Child Left Behind Act, but is not being proposed for phase-out.
 - i. If P.S. 30 is failing, the whole school should be taken over and money should be redirected to take over the entire school.
 - j. Students in grades 3-5 should be able to transfer out of P.S. 30 if the phase-out is approved.
2. P.S. 30 UFT Chapter Leader and SLT Member Ellen Klinger stated the following:
- a. The proposal is a “done deal” because the DOE already introduced the leader of the proposed new school to the community.
 - b. The DOE has not met with or supported staff as the proposal states.
 - c. It is unclear what kind of culture change P.S. 354 will bring; P.S. 30 already has a good culture, with dedicated staff.
 - d. No one has explained why P.S. 40 was taken off the phase-out list and P.S. 30 was not. Additionally, P.S. 40 is an older building, while P.S. 30 is a nicer building. A lot of the schools that are proposed to close down seem to be in nicer buildings.
 - e. Is a third school coming to the transportable classrooms?
 - f. P.S. 30 is not just a building. While teachers may find a job, they will have lost a home and a community.
 - g. While the DOE has stated that they are bringing new school leadership into the building, it does not make sense to have a principal come into a school that you have to shut down.
 - h. How many schools that were proposed to phase out were not actually phased out (i.e., were withdrawn or were not approved by the Panel for Educational Policy)? How many schools were phased out because the DOE could not help them?
 - i. While she read about a “deal being planned that they worked out,” she does not know about the deal. In addition, the P.S. 30 staff does not know about the deal and someone needs to tell the P.S. 30 staff about the deal.
3. Council Member Ruben Wills stated the following:
- a. The DOE first said that there were only seven public comments expressing opposition, but that was before they received the many e-mails and petitions.
 - b. It is clear that people care about their community and children. The DOE needs to consider their input when deciding on the proposal.
 - c. The new Chancellor should not treat the community with arrogance and disdain in the way the DOE has treated other communities. The DOE has an opportunity to take back this feedback and change this proposal into a positive direction of partnership.

4. Assemblywoman Vivian E. Cook stated the following:
 - a. This school was a good school until Mayor Bloomberg came and began to turn schools and communities upside down. The Mayor is wrong if he thinks that the community will just “lay down and die” and let him destroy our schools. We have gone back to a time when our schools are separate and not equal.
 - b. The communities that are being phased out are always minority communities. It appears that the Mayor is trying to shackle this community, from Jamaica High School to P.S. 30.
 - c. There is waste in the education system of New York City. The DOE needs to rethink its system and go back to the Mayor and tell him to stop laying off teachers and bringing another school into this building. The money should be put into P.S. 30 to support the teachers.
5. Multiple commenters stated their support for their school, citing the hard work of the P.S. 30 staff and the support of parents and teachers for the school. A commentator stated that his brother is improving at the school academically and socially.
6. Multiple commenters stated that they do not feel that the DOE is listening to their feedback. A commenter said the DOE should listen to the community instead of outside individuals who do not understand what is going on at the school.
7. Multiple commenters stated that P.S. 30 staff and parents feel that they can turn around the school.
8. Multiple commenters stated that extra funding, resources, and support should be given to P.S. 30 instead of phasing out the school. A commenter stated that there should be smaller class size and a better curriculum.
9. Multiple commenters raised concern about how the phase-out and replacement plan splits the school.
 - a. A commenter inquired why the phase-out and replacement plan does not include all students at P.S. 30. If the school needs change, that change should be applied to all students at the school. This proposal makes it seem that the DOE has given up on students in grades 3-5.
 - b. Another commenter added that bringing in new teachers will be traumatic for current students at P.S. 30.
 - c. A commenter stated that P.S. 30 should remain having one principal and two assistant principals.
 - d. A commentator stated that a lawyer will show how this proposal fails the spirit of the Brown v. Board of Education case, by creating a separate situation that is not equal.
10. Multiple commenters stated that the DOE needs to look at factors others than data. A commenter cited the Out of School Time program at P.S. 30 that he runs, which is a positive partnership that the DOE has never visited. The P.S. 30 community is already working together to protect and support students at the school.
11. Multiple commenters questioned the data that the DOE used to phase out P.S. 30.
 - a. A commenter stated that P.S. 30 has been singled out, even though multiple schools in the district and throughout the City have had poor ELA scores.
 - b. A commenter stated that the “Mayor’s people” said that P.S. 30 scores are “way up.” The commenter cited a Daily News article written on August 8, 2009.
 - c. A commenter stated that a lot of P.S. 30 students in grades 2-5 are new admits and have not gone through kindergarten and first grades, but are still expected to take

the state tests like every other student in the City. As a result, these students do not do as well.

- d. A commenter stated that the staff and students are better than what is being presented to parents and the community. The data shows that the school was getting progressively better until the criteria changed, at which point the DOE identified P.S. 30 as a failing school.
 - e. A commenter inquired why P.S. 30 is being proposed to close based on “one bad grade.”
 - f. A commenter stated that some student scores are based on students that come from outside the P.S. 30 school zone and require special education services, even though P.S. 30 does not receive additional funding. These scores also make the overall assessment of P.S. 30 unbalanced.
12. A commenter inquired why P.S. 30 was proposed for phase-out and P.S. 40 was removed from the phase-out list, even though P.S. 40 has lower progress report grades compared to P.S. 30 in the past two years. In addition, P.S. 30 did not exceed three consecutive years of failure.
 13. A commenter stated that she was insulted by the suggestion that a new school would bring in a new culture that is “supposed to be better.”
 14. A commenter inquired how P.S. 30 was given a chance to improve between the initial meeting with former District 28 Community Superintendent Jeannette Reed in October and now.
 15. A commenter stated that while parents had concerns in the past, they did not intend for the community feedback offered at the October meeting to be used against their school community.
 16. A commenter stated that she represents the Council of Supervisors and Administrators (“CSA”) and read a statement regarding school closings:
 - a. The CSA embraces accountability and believes that schools should be closed if they have failed for a period of three or more years, despite receiving full support from the DOE. However, it is unclear in several proposed school closings whether the structure that supports the schools is being held accountable along with the school.
 - b. The CSA inquires whether the schools are really failing, and if so, by what measures. The CSA also inquires whether there was a thorough process to identify whether each school was provided adequate support and whether the Office of School Enrollment “leveled the playing field” for the school.
 - c. Specifically, the CSA wants to know how the superintendent supported the school besides visiting the school; i.e., how did the superintendent support the school over the last few years. The DOE should also include an analysis of the role of the Children First Network and what support they provided to each school.
 - d. The DOE should also determine how the Office of School Enrollment helped minimize challenges in struggling schools and whether schools were sent a disproportionately large number of ELL students and students with disabilities.
 17. A commenter said the proposal to phase out P.S. 30 was part a larger agenda to privatize New York City schools.
 18. A commentator disagreed with the comparison made between the phase-out and replacement on the Evander Childs campus in the Bronx and the proposed P.S. 30 phase-out and replacement scenario.

19. Multiple questions were submitted that inquired about the core curriculum, whether there would be any difference in the core curriculum, and what educational improvements would be offered at P.S. 30 and the new school.
20. Multiple questions were submitted about whether the new school would be a charter school. A question was also submitted that inquired whether charter schools were subject to grading like district schools.
21. Multiple questions were submitted that inquired why P.S. 30 was being proposed for phase-out if the school was making progress, did not have three consecutive years of failure, and the decision was based on only one bad grade on the Progress Report.
22. Multiple questions were submitted that inquired specifically what the DOE has done to assist P.S. 30, including dates that the assistance was provided and in what capacity the assistance was provided.
 - a. A question was also submitted that inquired about the action plan the DOE claimed to have created for P.S. 30.
 - b. A question was also submitted that asked what consistent supports were in the school prior to the learning support organization that has been at P.S. 30 in the past month.
23. A question was submitted that inquired how a Quality Review affects the phase-out process.
24. A question was submitted that inquired about the time limit allowed for a school to turn around once it is deemed a “failing school.”
25. A question was submitted that inquired why a principal was already named for the new school and the new school was already given a number (P.S. 354) if this was still a proposal and not final.
26. A question was submitted that inquired why the DOE did not consider changing the school leadership instead of disrupting the P.S. 30 staff that works cohesively together.
27. A question was submitted that inquired whether the school was closing and what will happen to current students.
28. A question was submitted that inquired whether, if P.S. 30 is phased-out, a new administration would come in during the phase-out or whether the current administration would remain.
29. A question was submitted that inquired why P.S. 30 was chosen to phase out and P.S. 40 was removed from the list of possible phase-outs, even though P.S. 40 has lower Progress Report grades compared to P.S. 40.
30. A question was submitted that inquired why the P.S. 30 staff cannot remain at the school since the children have a place to go.
31. A question was submitted that inquired why P.S. 30 cannot continue to be a community school as it has been previously.

The DOE received several comments at the Joint Public Hearing that did not directly relate to the proposal and therefore will not be addressed.

- A commentator stated that Mayor Michael Bloomberg’s third term in office and the appointment of former Chancellor Cathie Black are examples of how rules are changed “to fit the situation.”
- A commentator stated that the Mayor is using tax dollars not only to destroy the public school system, but also to profit billions by way of multi-million-dollar-no-bid contracts.

The commentator cited a company that supplies cleaning supplies and is owned by the Bloomberg family.

- A commentator stated that any school system with an annual operating budget of \$21 billion and a five-year capital budget of \$11 billion should not be laying off teachers and/or overcrowding schools. Fiscal resources should be making the school system a shining example for the rest of the world and all children.
- A commentator stated that the problem is that the community has to be “engaged intellectually.” The community has to organize, chip in money, and hire lawyers to fight the DOE. The DOE only responds to money and power.
- A commentator stated that the proposal was part of a larger problem in which schools were given a Progress Report grade of “A” in 2009, which allowed the DOE to strip schools of resources for enrichment programs, teacher centers, and Saturday schools. The commentator added that Eva Moskowitz could take the school if she wanted to and that she would prefer P.S. 30 over P.S. 40 because it is a nicer building.
- A commentator stated that the Mayor should get rid of the city’s consultants from Europe.
- A question was submitted that inquired why teachers were not allowed to use blackboards any more.

The DOE received several comments in Written and/or Oral Comments that did not directly relate to the proposal and therefore will not be addressed.

- The DOE received a letter addressed to the Queens Borough President, the UFT Office, the DOE, P.S. 117, Brooklyn Technical High School, and the District 28 Community Superintendent that was signed by “P.S. 30 Staff” and stated the following:
 - Staff members are being treated unprofessionally by administrators. With Quality Review approaching, teachers are being told to do unwarranted things and the staff is exhausted.
 - There is no support from the UFT. The UFT representative does not try to compromise and does not represent the staff.
 - A mock Quality Review conducted at the school on April 4, 2011 by Network staff resulted in humiliation and low self-esteem on behalf of the staff.

Summary of Issues Raised in Town Halls

On January 13, 2011, a town hall was organized and hosted by Council Member Ruben Wills, Council Member Leroy Comrie, Assemblywoman Vivian E. Cook, and State Senator Shirley Huntley. Also present at the hearing was the UFT District 28 Representative Angela Artis and the DOE Director of Public Affairs Lenny Speiller. Approximately 200 members of the public attended the hearing and made comments. Although these comments were not received through the formal public comment channels, as a courtesy, the DOE wishes to acknowledge that several comments were made regarding the proposal to phase out and replace P.S. 30. Commenters expressed disapproval of the phase-out proposal, stated that P.S. 30 has not received enough support

from the DOE or warning that the school was struggling, raised concerns about school leadership and a lack of parental involvement, and wanted to know how the DOE intends to support grades 3-5 if the school phases out. Commenters also stated support for the staff of P.S. 30 and suggested that funds should go to P.S. 30 to help the school improve. Comments similar to these are addressed in the analysis of issues raised.

On March 29, 2011, a town hall was organized at P.S. 117 by the DOE and CEC 28. Present at the hearing were former Chancellor Cathie Black, Deputy Chancellor Marc Sternberg, Community District 28 Superintendent Beverly Ffolkes-Bryant and CEC 28 representatives Joseph Trotti, Emily Ades, Denise Nelom, Kathryn Thome, Deborah Dillingham, Lynn Schulman, Josianne Trahan, Nancy Tvedt, and Ying-Zi Yang. Approximately 200 members of the public attended the hearing and some members of the public made comments regarding the proposal. Again, although these comments were not received through the formal public comment channels, as a courtesy, the DOE wishes to acknowledge that several comments were made regarding the proposal. Commenters expressed concern about phasing out schools without community input and that phasing out schools divides the school community and drains resources. A commenter also asked that the DOE redirect funding to support existing schools. Again, comments similar to these are addressed in the analysis of issues raised.

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

Certain comments were received during meetings with parents and community members prior to the comment period on this proposal. Although these comments were not received during the comment period, as a courtesy, the DOE wishes to acknowledge that four written comments were received.

Among the written comments was a letter signed by “Concerned Teachers” in response to the “School Improvement Scenarios for P.S. 30” fact sheet that was published online by the DOE. The letter raised concerns about the curriculum, the age at which students enter P.S. 30, the discipline system at the school, the lack of an active PTA, and negative publicity published about the school and its leadership. The letter also disputed whether P.S. 30 teachers were given the opportunity to visit another successful school in its peer group. Finally, the letter made recommendations to improve the school, such as opening the Extended Day program to students in grades 1-5, shifting Thursday Extended Day away from data analysis to instruction, and getting parents more involved. The letter urged the DOE not to phase out the school and instead provide it with resources.

Certain comments were also received during an initial public comment period when the proposal was first published. Although this proposal was later re-filed (thus beginning a new public comment period), the DOE would like to acknowledge that four written comments and one oral comment were received:

32. A letter signed by “The Staff at P.S. 30” disputed parts of a fact sheet that was distributed by the DOE. The letter stated the following:
 - a. P.S. 30 was compared to a school in the Bronx that has 39% of its students qualifying for free or reduced lunch. P.S. 30 does not have 33% of the population qualifying for free or reduced lunch, as reported. The percentage is closer to 79.8%.
 - b. While it was stated that 40% of parents choose to enroll their children elsewhere, this cannot be possible if students are required to attend their zoned school.
 - c. While it was stated that parents “overwhelmingly” have no relations with the teachers or administration within the school, this is not true because teachers consistently

reach out to parents regarding students. The letter cited parent workshops and evening activities, as well as the Parents As Learning Partners program.

- d. While it was stated that P.S. 30 has not been involved with Community-based Organizations, this is not true because P.S. 30 has partnerships with Roy Wilkins Park and York College. The letter cited trips that P.S. 30 students have taken to the Veteran's Association and other community groups. The letter also cited extracurricular and enrichment programs at the school, such as Ballet Tech, Studio in a School, various clubs and sports teams, and partnerships that certain teachers and classes have.
 - e. While it was stated that the DOE helped the school's effort to improve performance through numerous supports, the P.S. 30 staff would like to see evidence of this support.
 - f. While it was stated to the staff of P.S. 30 that parents did not support the teachers, the parent surveys have approximately 90% of the parents praising teachers.
 - g. While it was stated that P.S. 30 has struggled for years, P.S. 30 earned an overall B grade on the Progress Report in 2009.
 - h. Other schools did not do well, but they were not proposed for phase-out. The letter inquired why P.S. 30 was not given the same opportunity.
 - i. The letter inquired how phasing out the school will benefit the students of P.S. 30.
33. State Senator Shirley Huntley stated her opposition of the planned rescheduling of the joint public hearing at P.S. 30 for Saturday, January 29. Ms. Huntley objected due to the short notice of the newly scheduled hearing, the fact that Saturday is a religious observance day for a segment of her constituents, and that not all CEC 28 members were consulted before rescheduling the hearing.
34. A commenter objected to the planned rescheduling of the joint public hearing at P.S. 30 for Saturday, January 29. The commenter objected due to the short notice, the fact that Saturday is a religious observance day for several members of the community, and that at least two members of the CEC did not agree to the date.
35. A commenter reflected on the decision not to phase out P.S. 114 and compared P.S. 114's performance with P.S. 30. The commenter stated that students at P.S. 30 have performed better than those at P.S. 114 with regard to their ELA and math scores. The commenter also cited Progress Report grades and the P.S. 30 Quality Review.

During the public comment period for the re-filed proposal, the DOE received 18 comments by e-mail, 161 comments by mail, and 4 comments by telephone.

36. The DOE received 159 letters addressed to the Panel for Educational Policy, former Chancellor Cathie Black, and Gentian Falstrom from the Office of Portfolio Planning. The letter was read aloud at the Joint Public Hearing at P.S. 30 on April 14 and is summarized above (Comment 1, a-f).
37. The DOE received 12 online petitions that urged the DOE to rescind the proposal to phase out and replace P.S. 30. The petition cited efforts by staff and parents to find ways to improve the academic performance and create a turnaround plan for the school. The petition stated that this was endorsed and supported by Council Member Ruben Wills.
38. Adrienne Adams, the Education Chair of Community Board 12, expressed her disagreement with the proposed phase out and co-location of a new school. Ms. Adams urged the PEP to consider the progress that P.S. 30 has made and continues to make after

the DOE initially evaluated the school. She requested that all public schools be provided “equal resources of improvement.”

39. Ms. Kelly, the PTA President of P.S. 30, said the following (via an e-mail and two phone conversations):
- a. The P.S. 30 community is against the proposal. The community wants to see money redirected to improving the school.
 - b. Parents are not being included to discuss the impact on the school.
 - c. It will be difficult to measure success in the new school because the new principal will not have testing grades in the beginning.
 - d. Ms. Kelly inquired about the difference between I.S. 72, which allows for NCLB transfers, and P.S. 30, which does not.
 - e. The main concern of the community is the impact on the upper grades at P.S. 30 and asked what action plan the DOE has for those students.
 - f. The community wants specific details and documentation about how the DOE and the Children First Network will support and guide P.S. 30. Ms. Kelly asked what will ensure that the new school is not phased out again if the same people are supporting the school going forward.
 - g. Ms. Kelly inquired how the new budget for a new school will compare to the budget given to existing schools for improvement.
 - h. Ms. Kelly inquired what the new “school culture” will be at the new school and how it will differ from the current culture. She also inquired how the DOE will measure this.
 - i. The SLT reviewed notes from the Quality Review held on April 14. The language reflected that existing programs are “effective” and should continue to improve and become adopted by the entire school body. Ms. Kelly asked how the Quality Review will impact the decision to phase out P.S. 30.
40. The DOE received a letter addressed to the Queens Borough President, the UFT Office, the DOE, P.S. 117, Brooklyn Technical High School, and the District 28 Community Superintendent that was signed by “P.S. 30 Staff” and stated the following: There is an ineffective writing program. It is complex to display standard-based writing because the student population “can’t write.”
41. The DOE received an action plan from the P.S. 30 staff that listed ways to enable students to achieve “proficiency and beyond.” The plan was divided into suggestions for six sections: Lower Grades (PK, K, 1, 2, and 3), Upper Grades (4 and 5), Special Education, Clusters, Counseling/Support Services, and General. The suggestions are summarized as follows:
- a. Lower Grades: Create and implement social promotion guidelines to stop socially promoting students within K-2 who lack foundational skills; create a team of teachers to investigate an alternate program for Everyday Math; implement structured phonics lessons in all early childhood classrooms; allow designated times for reading coaches to work with individual teachers; provide professional development; target at-risk students and utilize Title I funding to provide additional academic support; utilize a more structured writing program and integrating writing units with Reading First genres; implement writing journals in Grade 1; allow time in the school day for handwriting instruction; implement writing portion of Reading First program; research and purchase textbooks for K-2.
 - b. Upper Grades: Split Extended Morning into two groups (Academic Intervention and Support for ELA and Math; Enrichment); provide mandatory AIS support for students repeating a grade; establish more time for grade level planning and analyzing

assessments; establish an enrichment club; give teachers latitude to modify writing program; build test preparation into the schedule throughout the year; find an alternative math program for Everyday Math; provide consumables for students to expand spelling and vocabulary.

- c. Clusters: Work with schedule committee to create a schedule that maximizes teaching time; use double preps within core subject areas to minimize transition time and maximize learning.
 - d. Counseling/Support Services: Create time within school day for positive reinforcement and follow up with students; reintroduce after-school activities such as basketball and tennis to foster a sense of community; create a schedule for all providers in advance to alleviate mid-lesson interruptions and conflicting times.
 - e. General: Create standard assessments for newly admitted students to determine placement; create schedule committee to examine ways to effectively schedule cluster periods, testing blocks, and related service providers; provide an AIS system that allows for small-group instruction with multiple types of intervention; use Extended Day time to work with students in danger of failing the state tests; use Thursday Extended Day time to work with students instead of devoted to data analysis; use Menu Preps to focus on the needs of students; create a committee to develop a school-wide behavior code of conduct; create/reinstate enrichment programs; create a school-wide seasonal parent newsletter; designate days where parents are invited to the school to participate and observe; and allow more teacher input and involvement in the Comprehensive Education Plan.
42. Multiple commenters submitted a Daily News article that was written in 2009 that cited a quotation from an unnamed State Senate Democratic colleague, who said, “The mayor’s people looked into it, said the principal was great, reading and math scores at the school are way up and offered to transfer her daughter to another school.” Commenters inquired why P.S. 30 was being phased out if scores were considered “way up” previously.
43. Multiple commenters inquired why all grades are not being considered to be part of the new school. A commenter urged change for all the students at P.S. 30.
44. A commenter urged the community to organize against the proposed phase out.
45. A commenter stated that she had to search for a different school for her child because P.S. 30 was failing in all areas. The commenter expressed shock that it took so long for the DOE to intervene. The commenter expressed a desire for her youngest daughter, currently in pre-kindergarten, to be able to attend a school of her choice or for the DOE to improve P.S. 30 so that they can send her there.
46. A commenter inquired whether the phase-out proposal meant that P.S. 30 would serve third through fifth grades or whether P.S. 30 would retain its fourth and fifth grades the following year, as it begins to phase out.

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

Comments 1 (a) and 36 suggest that this proposal is a temporary solution. The DOE is proposing to replace P.S. 30 with a new zoned elementary school that would serve all future zoned students. As such, the DOE believes that this proposal represents a long-term solution for students in this zone.

Comments 1 (b), 1 (i), 1 (j), 9 (a), 9 (b), 36, 39 (e), and 43 all express concern about current second, third, and fourth grade students who would remain enrolled at P.S. 30 during the phase-out plan and how they would be supported and not made to feel that the DOE has given up on them. As described in the EIS, P.S. 30 would continue offering all necessary classes to support current students as they work to meet promotional requirements. In addition, P.S. 30 will continue to receive support from a Children First Network team throughout the phase out process. This team will continue to provide instructional and operational support to the school administrators, teachers, and staff. Finally, as described in the EIS, current and future fourth graders may elect to participate in the application process for Louis Armstrong Middle School (28Q227), which is a 5-8 middle school accepting students as rising fifth graders. Comment 1 (j) suggests that current second, third, and fourth grade students be able to transfer out of P.S. 30 if the phase-out is approved. Transfers from P.S. 30 to another school may be available for the following reasons, among others: medical issues, safety concerns, sports, or travel hardship. For more information regarding a students' eligibility for a transfer, please see Chancellor's Regulation A-101, available at <http://docs.nycenet.edu/docushare/dsweb/Get/Document-11/A-101%20Final.pdf>. However the DOE does not permit students to transfer out of a school simply because it is in the process of phasing out.

Comments 1 (c) and (g) and 36 suggest that concerns and needs of the school have not been heard. The DOE has many avenues through which parents can share feedback and concerns about their children and school, including but not limited to: the Parent Coordinator, the school's PTA, the District Family Advocate, the Community Education Council (elected by the district community), and 311. Families are encouraged to reach out to whichever of these people and offices are appropriate, especially if they have specific concerns they feel have not been answered at the school level.

Comments 1 (c) and 36 also suggest, as do Comments 6 and 39 (b), that the community's feedback has not been taken into consideration. Comments 3 (b) and (c) emphasize that the DOE needs to consider the community's input and in response change the proposal. Indeed, the DOE welcomes feedback and has worked hard to ensure that the P.S. 30 community has had the opportunity to share concerns, ask questions, and discuss alternate proposals throughout this process. Our goal for every proposal is to engage communities well in advance of a PEP vote. In the case of P.S. 30, we talked to school leadership, parents, the SLT, CEC 28, and local community representatives about our ideas. We were very clear in these meetings that we had not settled on any proposals yet, and we were there to hear feedback and new ideas. We integrated feedback into our decision to propose P.S. 30 for phase-out. Deciding to phase out a school is the toughest decision we make, but it is the right thing to do for the students in some schools. In this case, the DOE continues to believe that the phase-out and replacement of P.S. 30 is the best course of action for the school, but this does not mean that the DOE has not carefully considered the community's feedback.

In addition, since the proposals to phase-out and replace P.S. 30 were issued, the DOE has received public comments regarding the proposals through email, mail, telephone at the Joint Public Hearing and at two town hall meetings. These comments and the DOE's analysis of the issues raised will be presented to the PEP prior to its vote on the proposals.

Comments 1 (d) and 36 ask how the new school will be different from the existing school. As explained in the EIS, the DOE has proposed the phase-out of P.S. 30 and its replacement by a new school because we feel that only the most serious intervention—the gradual phase-out and eventual closure of P.S. 30—is the action the DOE must take to best serve students and the community. The DOE has proposed a school with similar structures to P.S. 30 in order to meet the P.S. 30 community’s need for a high quality zoned elementary school and to replace the capacity lost as a result of the phase-out of P.S. 30 seat-for-seat. The DOE believes that a change in school staff will provide the community with a high quality option.

Comments 1 (e) and (i), 8, 36, and 39 (a) and (g) suggest that fiscal resources would be better served by supporting P.S. 30 instead of replacing it. The DOE disagrees. New schools are funded in the same manner as our other schools. Funding follows a student and is based on student need (ELL, Special Education, below standards, etc.). While it is true that new schools receive start-up funding, the start-up funding they receive is an average of \$30,000 per year over the first five years. This amount is not large enough to even cover the salary of a first year teacher, and the DOE believes it is not sufficient to support the type of change needed to turnaround P.S. 30. Additionally, a commenter included in Comment 8 suggested that funds should be used to create smaller class sizes and a better curriculum. Again, the funds allotted to the replacement school as start-up funding would not be enough to reduce class sizes if added to the P.S. 30 budget. Additionally, the DOE believes that a new curriculum would not be enough to turn P.S. 30 around, but that the proposed replacement school and proposed new leader would be better able to meet students’ instructional needs.

Comments 1 (f) and 36 suggest that the phase-out will have an adverse impact on children, parents, and community members and will create a stressful environment for students. The DOE understands the environmental concerns involved in the prospect of phasing out a school, especially when a school has been a part of the community for as long as P.S. 30 has been. However, this is not a reason to keep a school open when it is failing to serve its students. Additionally, the existing environment at the school (i.e., before the proposal to phase the school out was released) is one that survey results show is already having an adverse impact on stakeholders. On the 2009-2010 Progress Report, P.S. 30 earned a C on the Environment subsection. Further, on the 2009-2010 New York City School Survey, 57% of teachers reported that they felt order and discipline were not maintained at the school, and 25% of parents felt that students threaten or bully other students either fairly often or very often.

Comments 1 (h), 36 and 39 (d) disagree with the DOE’s methodology for determining which schools should be phased-out, specifically citing a nearby middle school, M.S. 72, which provides transfers pursuant to the No Child Left Behind Act, but is not being proposed for phase-out. The DOE recognizes that P.S. 30 received a 2010-2011 State Accountability Status of “In Good Standing.” But there are two major differences between how the State makes its assessment and the accountability metrics used in the Progress Report.

- The State’s evaluation is based on a yearly assessment of students’ performance at a given point in time. In contrast, the progress report and DOE accountability metrics rely more heavily on student progress and the growth students make over time.
 - For example, in 2009-2010, M.S. 72 was in the 57th percentile for learning growth in English Language Arts (“ELA”) and in the 40th percentile for learning growth

in math. In contrast, during the same year, P.S. 30 was only in the 7th percentile for learning growth in ELA and the 15th percentile for learning growth in math.

- The two schools serve different grade levels of students which makes the comparison a difficult one. However, most P.S. 30 students are zoned to M.S. 72 for middle school, and therefore these growth measures show different results with a similar population of students as they move from elementary to middle school.
- In addition, the State does not account for student demographics. The Progress Report metrics use a peer index which controls for student characteristics including the percent of students eligible for free lunch, the percent black and Hispanic, percent special education and percent English Language Learners. In the DOE progress report, each school's performance is compared to the performance of schools in its peer group (i.e., other schools whose student bodies have similar characteristics). The State's accountability, on the other hand, is demographically neutral.
 - Among its middle school peers, M.S. 72 ranked in the 32nd percentile Citywide. Compared to its elementary peers, P.S. 30 ranked in the 11th percentile. These figures grow more exaggerated compared to peers in the same geography: M.S. 72 ranked in the 43rd percentile of District 28 middle schools, while P.S. 30 ranked in the 3rd percentile of District 28 elementary schools.

Thus, the DOE believes that the Progress Reports are a more accurate representation of a school's ability to improve student performance and growth over time. In addition to the Progress Reports, the DOE does take into account how the State assesses a school's performance. However for the reasons stated above the DOE weighs the Progress Report scores more heavily when making a determination to phase out a school.

Comment 2 (a) suggests that the proposal is a "done deal" because the DOE already introduced the proposed new leader of the proposed new school to the community, and Comment 25 also asks why a new school number has already been assigned to the proposed new school. The DOE did bring the proposed new leader of the replacement school to meet the community in January. This was done to get a specific sense of what the community would want to see in the replacement school, as well as to address the feedback the DOE received last year about how it issued phase-out proposals and waited for PEP approval before submitting replacement proposals. This introductory meeting was not meant to supersede any decisions. These proposals will only be implemented if approved by the Panel for Educational Policy ("PEP") on April 28, 2011. Rather, both this and the development of a new school number were in effort to assure the community that the DOE is responsibly proposing and planning for a replacement school and to share this with the community so that the overall plan to better serve the P.S. 30 community could be understood as a whole.

Comment 2 (c) states that the new school's culture is an unknown, while P.S. 30's has a good culture. Comment 39 (h) additionally asks how the DOE will measure this culture of achievement. As described above in response to Comment 1 (f), the DOE does not agree that the culture at P.S. 30 is a strong culture supportive of student progress and high quality performance. The DOE has confidence in the abilities of the proposed leader for the new school to create a strong culture, if the proposals to phase-out and replace P.S. 30 are approved. The new school will be measured along the same standards of student performance and student progress, and the

more intangible effects of culture would be captured in the NYC School Survey and in the Environment sub-section in the Progress Reports.

Comments 2 (d), 12, 29, and 32 (h) ask why P.S. 40, another school in District 28 which was also considered for phase-out, was not moved forward and proposed for phase-out while P.S. 30 was. After evaluating P.S. 40's data and speaking to its community, the DOE believes that P.S. 40 has the capacity to turn around. In addition to qualitative comments and opinions supporting this decision, the DOE notes that P.S. 40's previous two Progress Report Grades put the school in the 11th and 15th percentiles in 2008-2009 and 2007-2008 respectively, whereas P.S. 30 was in the 3rd and 5th percentiles. Additionally, P.S. 40 has achieved these better results with a higher-need student population: 10% of P.S. 40 students are English Language Learners, compared to 2% of P.S. 30's students, and 92% of P.S. 40 students qualify for free and reduced lunch, compared to 81% of P.S. 30's students. Further, the DOE decided to propose an alternate intervention for P.S. 40, to truncate the school's sixth grade, because it believes that this change would allow P.S. 40 to focus turnaround efforts on its elementary level, rather than working at both the elementary and secondary levels. P.S. 30 is already a K-5 school, so this intervention was not an available option when considering interventions to help turn the school around. A commenter also suggested that P.S. 30 is being proposed for phase-out because it has a nicer building that a new school would prefer. The age or quality of Buildings Q030 and Q040 or any other buildings were not considered during the DOE's decision-making process of which schools to propose for phase-out.

Comment 2 (e) asks if a third school is going to be placed in the Transportable Classroom Units ("TCU"s). The DOE has only proposed to co-locate P.S. 354 in Building Q030 as P.S. 30 phases out. The DOE has no plans to place an additional school in the building or TCUs.

Comment 2 (f) suggests that in phasing out P.S. 30, teachers will have lost a home and a community. The DOE understands the emotions involved in the prospect of phasing out a school and that the school has become a home and community for all of its stakeholders, including teachers. However, as stated above regarding comment 1 (f), this is not a reason to keep a school open when it is failing to serve its students.

Comment 2 (g) suggests that it does not make sense to bring a new leader into the building when phasing out P.S. 30. However, the new leader would be serving the replacement school, P.S. 354, and as such would continue to serve the school and community after P.S. 30 has completed its phase-out process.

Comment 2 (h) asks how many schools were initially considered for phase-out that were not formally proposed for phase-out and how many schools were phased-out because the DOE could not help them. This year, 55 schools across the City and at all grade levels were originally considered for various interventions, including the most significant intervention of phase-out and replacement. Of these, 24 were proposed to the PEP for phase-out, and 1 was proposed and subsequently withdrawn. In the case of the 24 schools finally presented to the PEP for a vote, the DOE believes that it could not turn around each of these. In fact, it is the 32 schools that were either never proposed or were withdrawn that the DOE believes can, with its help, turn around.

Comment 2 (i) refers to a “deal being planned that they worked out” and asks what the deal is and states that it needs to be shared with P.S. 30. The DOE is unaware of any deals regarding the proposals to phase-out and replace P.S. 30 and therefore is unable to share information on this topic with staff or community members.

Comment 3 (a) expressed that public comment had increased significantly leading up to the Joint Public Hearing at P.S. 30 which was held on March 14, 2011. The DOE (and the number of comments and letters submitted and described in this Analysis of Public Comment) confirms that this is true.

Comments 4 (a) and (b) state that the school’s performance was good until Mayor Bloomberg received mayoral control, and, as also suggested in Comment 9 (d), that phase-outs target minority communities and are unjust. The DOE determines which interventions to apply to schools based on the performance of the school (including student progress and student demographics) over time. The specific ethnic make-up of P.S. 30 was not a factor in the DOE’s decision to propose to phase out and replace P.S. 30. Rather, the DOE believes that the phase-out and replacement of P.S. 30 will best serve the school community.

Comment 4 (c) states that the DOE should not lay off teachers and bring another school into the building, but rather should put money into P.S. 30 to support the teachers. The proposal to phase-out and replace P.S. 30 will not result in teachers being laid-off. Rather, teachers will be excessed from the school as it phases out and eventually closes. As described in detail in the EIS, all excessing would be conducted in accordance with existing labor contracts. For example, the current United Federation of Teachers (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 teacher who did not find a permanent position would be placed in the Absent Teacher Reserve pool, meaning that they would continue to earn their salary while serving in the capacity of a substitute teacher in other City schools. Further, and as explained above and in the EIS, the DOE does not believe that additional funds would result in the school’s turning around.

Comment 5 states support for P.S. 30, specifically the hard work of staff, teachers, and parents. The DOE is striving to create a system of great schools in which all students have access to a high quality education. While the DOE recognizes that P.S. 30 supporters, staff members, and parents have worked hard to improve the school, and the DOE has offered and provided support, the school has not turned around. Despite the dedication of the community to P.S. 30, the DOE believes that the students deserve a high quality school and therefore continues to propose to phase out and replace P.S. 30.

Comments 7, 14, 24, 32 (h), 37, 38 and part of Comment 10 refer to the belief that the P.S. 30 staff and parents can turn around the school, and, as added by Comment 9 (c), that the school remain with one principal and two assistant principals. As stated above, while the DOE recognizes that P.S. 30 supporters, staff members, and parents have worked hard to improve the school, and the DOE has offered and provided support, the school has not turned around. In particular, in 2009-2010 the school earned a C on the progress sub-section of the progress report. In 2009-2010, P.S. 30 was in the bottom 15% of Citywide elementary schools in terms of learning growth in math and the bottom 7% of Citywide elementary schools in terms of learning

growth in English. In 2008-09, P.S. 30 was in the bottom 2% of Citywide elementary schools in terms of the percent of students making one year of progress in math. If these low results persist, P.S. 30 students will continue falling further behind their peers in other schools. Even if this trend were to reverse and learning growth rates increased substantially, several more cohorts of students would pass through P.S. 30 before the school would see real improvement. The DOE believes that incoming students would be served much better by the replacement school than by P.S. 30 as it attempts to reverse its downward trend in student achievement and learning growth.

The DOE's metrics indicate that P.S. 30 is not performing as well as other schools in its peer group, which have student populations most like its own. Because of these factors and despite the fact that the school was rated "In Good Standing" by New York State, the DOE has made the difficult decision to propose to phase out and close P.S. 30.

Similarly, Comment 11 (a) states that P.S. 30 had been singled out despite multiple schools in the district and City having poor performance. Again, the DOE believes that P.S. 30's low performance and, significantly, its low percentile rankings in student progress, suggest that the school is more underperforming than those in its peer group serving similar students.

Comment 10 suggests that the DOE should look at factors other than data, and Comments 23 and 39(i) ask how the Quality Review is included in the decision-making process. As described below, the DOE also considered qualitative input from DOE officials familiar with the P.S. 30, including the school's Children First Network, as well as through the Quality Review process and from the school community.

- The Quality Review was developed to assist DOE schools in raising student achievement. The process is designed to look behind a school's performance statistics to ensure that the school is engaged in effective methods of accelerating student learning. During the review, an external evaluator visits classrooms, talks with school leaders, and uses a rubric to evaluate how well the school is organized to educate its students. As a result, the Quality Review focuses on the coherence of a school's systems, measuring how well it is organized to meet the needs of its students and adults, as well as monitor and improve its instructional and assessment practices. The Quality Review is just one indicator out of many that contribute to the overall decision-making around a proposal to phase-out a school and in assessing whether the school lacks the capacity to turn around.
- As stated in more detail the EIS, P.S. 30 was rated "Proficient" on its most recent Quality Review in 2008-2009. While a rating of Proficient reveals that a school possesses strengths and weaknesses, P.S. 30's 2009 Quality Review cited a number of serious concerns, including teacher training, using data to inform instruction, and goal-setting based on student sub-group outcomes.
- Prior to the decision to propose the phase-out of P.S. 30, the Superintendent facilitated a meeting with the school community including the School Leadership Team, parents, and teachers to explain the measures used to identify failing schools. At the meeting, the DOE also reviewed with these community members what supports had been put in place at the

school already. A letter was sent home to notify parents of this meeting on October 26, 2010, in students' backpacks. The DOE listened intently to parents, school staff, students, and other members of the community for feedback, which included parent concerns about communication between schools and parents and that parents did not feel connected with the Community-based Organizations that partner with P.S. 30.

In determining to phase-out P.S. 30, the DOE considered the results of the quality review and parental feedback as well as the results of the school's progress report and other student achievement data. After a thorough review of this information, the DOE believes that the phase-out and replacement of P.S. 30 will provide the community with a much needed high quality school option.

Comment 11 suggests that the data that the DOE used to decide to phase out P.S. 30 is incorrect. The DOE provided P.S. 30 administration all of the data underlying the calculation of all Progress Report measures—including those used in the phase-out decision making process and cited in the EIS—during the Progress Report verification period in October 2010. The school administration had ample opportunity to review and update that data.

Comments 11 (b) and 42 cite an article from the Daily News from August 8, 2009 quoting Mayor Bloomberg's staff on P.S. 30's improved performance. The underlying data presented in the article represented changes between the 07-08 school year (three years ago) and the 08-09 school year (two years ago). While the DOE considered this data during the decision-making process, it is only one factor that was considered.

Comment 11 (c) and (f) suggests that because several students are new to P.S. 30 in grades 2-5, their lower performance on state tests should not be counted towards P.S. 30. However, P.S. 30 was in the bottom 11th percentile Citywide for elementary schools in 2009-2010 and in the bottom 3% and 5% in 2008-2009 and 2007-2008, respectively. This suggests that students coming from other schools would, on average, bring the proficiency levels of the P.S. 30 student body up.

Comment 11 (d) suggests that the school is better than what the data shows, and specifically that it was only when the criteria changed on the state tests that the DOE identified P.S. 30 for phase-out. The DOE notes that, due to the change in cut-off scores on the annual mathematics and English Language Arts exam by the New York State Education Department, the percent of students performing at grade level fell at most New York City schools. But while the percent achieving proficiency declined, on average, New York City's students' raw scores on the tests remained largely unchanged relative to the prior year. The DOE notes that the change in scoring methodology does not mean that scores are either "flawed" or "inaccurate." The more recent scores arrived at with the new methodology can still be used to compare schools' performance, and under the new scoring system, as under the old system, P.S. 30 students did poorly relative to other students in comparable schools.

Comments 11 (e) and 21 suggest P.S. 30 is being phased-out because of one bad grade, and Comment 32 (g) states that the school's B grade in 2008-2009 suggests the school has not struggled for years. As explained in the EIS, and above in response to Comments 7, 10, 14, 24,

32 (h), 37, and 38, P.S. 30 has struggled for years and has received low grades and been in the bottom percentiles for several years. Even though the school received a B on its 2008-2009 Progress Report, it was still in the 3rd percentile of elementary schools Citywide. Furthermore, the school received a C grade on its progress report in 2007-2008 and a D grade in 2006-2007. In 2009-2010, P.S. 30 was in the bottom 15% of Citywide elementary schools in terms of learning growth in math and the bottom 7% of Citywide elementary schools in terms of learning growth in English. In 2008-09, P.S. 30 was in the bottom 2% of Citywide elementary schools in terms of the percent of students making one-year progress in math. This demonstrates that P.S. 30 is not being phased-out just because of one grade.

Comment 11(f) also states that some students require special education services, even though P.S. 30 does not receive additional funding, and that these scores should change the overall assessment of P.S. 30. In response to the first part of the comment, while the school does have a significant high needs population—20% with Individualized Education Plans (“IEPs”)—the school does receive additional funding to support these students. In fact, Fair Student Funding (“FSF”) awards supplemental allocations on a per pupil basis to students who have additional needs and therefore cost more to educate. This is described in further detail in the EIS. Secondly, the Progress Report data used to inform the phase-out decision-making process includes information on the number of students with special education needs and accounts differently for schools with different numbers of this type of student. P.S. 30 performed more poorly than other schools with similar percentages of students with IEPs.

Commenter 13 was insulted by the DOE’s suggestion that a new school would bring in a better culture than the current one at P.S. 30. It was not the DOE’s intention to offend any individuals in sharing this opinion, but rather to support the DOE’s decision to propose to phase out and replace P.S. 30.

Comment 15 suggests that parents shared their concerns at the October 26, 2010 meeting to support the school, not to provide information to be used against the school. The DOE was clear that the purpose of these meetings was to learn about the school in order to determine the appropriate course of action. However, again, the DOE’s intention was not to mislead parents and regrets if it did so while trying to solicit feedback about the school.

Comment 16 (a) addresses the DOE’s process for holding the school accountable for poor performance, saying that the support systems should also be held accountable along with the school. The DOE annually evaluates the Children First Networks in addition to the schools to determine whether they are adequately supporting their schools. Appropriate action is taken when it is determined that a network is underperforming.

Comment 16 (b) asks by what measures P.S. 30 is failing. The measures used to determine P.S. 30’s poor performance are shown in the data in the Progress Report, among other places. These measurements and their standing relative to other schools’ measurements are described in detail in the EIS, as well as in response to Comments 7, 10, 14, 24, 32 (h), 37, and 38 above.

Comment 16 (c) asks how the superintendent and the Children First Network has supported the school over the last few years. These supports are detailed in the EIS on pages 4-6. For example, the network has supported the school leadership in creating a plan that addressed areas for

improvement identified in P.S. 30's Quality Review, provided instructional support by offering training to teachers on behavior modification and individualized instruction, and assisted teachers of English as a Second Language with lesson plans and creating a classroom environment to reflect language instruction.

Comment 16 (d) asks about the role of the Office of Student Enrollment in supporting the school, in particular regarding the number of English Language Learners ("ELLs") and students with disabilities. Only 2% of P.S. 30's student population are ELLs, though 20% do have IEPs as detailed above. Students with disabilities are offered placements in schools that can provide appropriate services as mandated by their IEPs. Out of zone students with IEPs may be offered a seat at P.S. 30 if the school has an available seat in an appropriate program for that student. Each year, the DOE reviews the number of rising kindergarten students requiring IEP services. Based on the number of students requiring services zoned to each elementary school in a community, the DOE determines whether and where a special education class should be opened. The DOE does not believe that P.S. 30 has a particularly large number of ELL students.

Comment 17 suggests the proposals to phase out and replace P.S. 30 are part of an attempt to privatize New York City schools, Comment 20 asks about whether the school would be a charter school, and Comment 31 inquired about the school remaining a community school as it was previously. The DOE has no intent to privatize its schools. The proposed replacement school for P.S. 30 is a zoned, district elementary school, and therefore it would not be a charter school. Comment 20 also asked whether charter schools are subject to grading like district schools, and they are.

Comment 18 disagreed with a comparison which was made to the phase-out and replacement of Evander Childs High School in the Bronx. While the schools are different in grade level and in size, the comparison was made during the hearing to demonstrate that the DOE's strategy of phasing out and replacing underperforming schools with high quality options has been successful.

Comment 19 asks about the core curriculum and what educational improvements would be offered at P.S. 30 and the new school. As described above in response to Comments 1 (b), 1 (i), 9 (a), 9 (b), 39 (e) and 43, P.S. 30 will continue to be supported by the DOE through its Children First Network, as would the new school, P.S. 354. The new school and proposed new leader will create academic plans with an eye towards the new national standards, known as the Common Core, to best prepare its students to succeed while at P.S. 354 and beyond. These standards will be formally adopted by New York State in the next few years, when State tests will also begin to assess students according to them, rather than the current set of New York State standards. More information on the Common Core can be found at: <http://www.corestandards.org/>.

Comment 22 (a) asked about the action plan the DOE "claimed to have created" for P.S. 30 and about whether the period of time between the October 26, 2010 meeting and the phase-out and replacement proposals was enough time to turn around. The only plan the DOE has created for change at P.S. 30 are the phase-out and replacement proposals; no different DOE action plan exists. Further, the DOE made its decision based on quantitative and qualitative information from years of school data. As explained elsewhere in this document and in the EIS, the DOE felt

that the performance of the school over these years warranted the most significant intervention, despite potential changes in the school during the current school year.

Comments 2 (b), 22 (b), 32 (e), and 39 (f) question the DOE's statement (in the EIS and at the Joint Public Hearing) that supports were provided to P.S. 30 staff and teachers. The network team visited the school several times over the past years to offer support. Specifically:

- During the 2009-2010 school year, 7 different network team members collectively made 34 visits to the school—26 during the first half of the year and 8 during the second half of the year.
- During the 2010-2011 school year, 14 different network team members, including the CEO of Cluster 3, as well as consultants from Hofstra University and AUSSIE, collectively made 96 visits to the school—53 during the first half of the year and 43 since January.

Examples of these visits include:

- A small workshop with 3 teachers to get input on developing a tool for administrators to monitor the progress of instructional coaches and teachers;
- Classroom visits/observations to assess differentiation and level of rigor of instruction;
- A large workshop with 39 participants to discuss unit and lesson planning around Everyday Math; and
- Assisting the principal with: completing a safety plan for the school, an action plan for the principal, and curriculum mapping.

Comment 26 suggests that changing the school leadership instead of phasing out P.S. 30 would be more preferred. As explained above and in the EIS, the DOE believes that only the most significant intervention—phase-out and replacement—is required to provide a high quality option for the community.

Comments 27 and 46 ask whether the school is closing, what grades will be served at each school, and what would happen to the students. As described in the EIS, if these proposals are approved by the PEP on April 28, 2011, the school organization of P.S. 30 would be phased-out and replaced by P.S. 354 beginning in September 2011. The new school would serve the exact same zone as P.S. 30 has and would do so in the Q030 building. All current second, third, and fourth grade students will remain in P.S. 30 in the Q030 building as the school phases out. All current kindergarten and first grade students, as well as all future students, would attend P.S. 354 in the Q030 building as it phases in. Thus, all students currently guaranteed a seat to the Q030 building would continue to have the same guarantee.

Comment 28 asked about changes to P.S. 30 leadership with regard to the phase-out decision and who would lead the schools moving forward during its phase-out. The DOE does not discuss personnel decisions publicly.

Comment 30 asked why the P.S. 30 staff could not remain at the school like the students. As described in the EIS, all excessing would be conducted in accordance with existing labor contracts. It is also important to understand that the students who may have otherwise been enrolled in P.S. 30 will now be enrolled in P.S. 354, and that school might need to hire additional staff. New staff positions would also be created due to the phase-in of the replacement school.

New schools follow the hiring process consistent with the procedures set forth in the collective bargaining agreement between the DOE and UFT. New schools hiring that have an impact on a school that is closing or phasing out, shall be required to hire up to 50% of the most senior qualified staff from the closing or phasing-out school, if sufficient number of staff apply, until the impacted school is closed.

Comment 32 (a) refers to free and reduced lunch numbers for P.S. 30 and schools to which it was compared in the Fact Sheet originally shared with the school community. At the time when the Fact Sheet was shared, schools had not yet reported complete information about the number of students eligible for free or reduced lunch. However, the correct numbers are as follows, and the figures for P.S. 30 were accurately reported in the EIS.

School	Percent of students receiving free or reduced lunch
P.S. 30 - Queens	81%
P.S. 76 – Bronx	85%

Comment 32 (b) questions the percentage of zoned students who attend the school. The percentage of zoned students attending only applies to those students zoned to P.S. 30 who have chosen to attend a DOE or charter school other than P.S. 30. This means that students zoned to the school who attend parochial or private school are not included in this statistic. Many zoned students have a variety of options other than their zoned school, including but not limited to: specialized Gifted and Talented programs, charter schools, or DOE schools that admit students through application rather than zoned priority. As stated in the EIS, 40% of students zoned to P.S. 30 attend an alternative DOE or charter school, indicating a significant desire for students living in this community to attend a school other than P.S. 30. Further, students are not required to attend their zoned school, they simply have a guarantee to attend that school.

Comment 32 (c) suggests that the Fact Sheet incorrectly stated that parents have no relationship with teachers. In fact, the Fact Sheet provides that,

“During conversations with the P.S. 30 community, we heard concerns about a lack of communication between families and the school, too few opportunities for parents to get involved with the school, and a lack of partnerships with community organizations. We also heard about difficulties with discipline and helping struggling students improve. The community did have positive feedback about a before-school extended-day program and teacher training opportunities. However, we do not believe these efforts are enough to move the school in the right direction.”

This is what parents shared at the time, though their feelings may have improved since then or different parents may have different opinions.

Comment 32 (d) suggests the DOE did not recognize P.S. 30’s involvement with Community-based Organizations (“CBOs”). The Fact Sheet does describe that parents reported feeling there were few opportunities for this kind of program at P.S. 30. However, the DOE did recognize P.S.

30's existing partnerships on page 10 of the EIS, such as those with Studio in a School, St. Clement Hope Food Pantry, and Ballet Tech.

Comment 32 (f) suggests that the staff was told parents do not support them, despite the school's results on the 2009-2010 NYC School Survey for P.S. 30. The survey shows over 90% parent satisfaction with their child's education, the opportunities to be involved in their child's education, and how well the school communicates with them. Parent feedback from the October 26, 2010 meeting (which approximately 55 parents attended) described in the EIS suggested a lack of satisfaction with school communication, involvement, and partnerships, but did not say anything about teachers.

Comment 32 (i) asks how the phase-out and replacement will benefit P.S. 30 students. The DOE believes that P.S. 30 has not been meeting its students needs and does not have the capacity to turn around to do so. The DOE also believes that the new school it has proposed will be a high quality, and therefore much improved, option for these same students.

Regarding Comments 33 and 34, the Joint Public Hearing for this proposal was originally scheduled for January 27, 2011, but this was cancelled due to a snow day which closed schools on the 27th. In order to try to come to a timely conclusion of the phase-out and replacement proposals, the DOE attempted to reschedule the hearing within the legally mandated 45-day hearing window, which extended only through Sunday, January 30. While Saturday, January 29th was considered as a possibility, not all hearing participants were available on that date and so the hearing was rescheduled for a date later in the school year.

Comment 35 compares P.S. 30 with P.S. 114 in Brooklyn, a school which was proposed for phase-out and subsequently withdrawn. Specifically, the comment refers to the allegedly superior performance of P.S. 30. All phase-out decisions take many facts and figures into account, including qualitative information about schools as well as data. That said, in 2009-2010, P.S. 114 students scored better than P.S. 30 students, with 35% proficient in English Language Arts to P.S. 30's 27% proficient, and with 34% proficient in math to P.S. 30's 31% proficient. In 2008-2009, P.S. 114 had 64% and 82% of students proficient in ELA and math, respectively, to P.S. 30's 58% and 70%, and in 2007-2008, P.S. 114 had 57% and 82% proficient in ELA and math compared to P.S. 30's 49% and 65%. P.S. 114 also has a significantly higher percentage of students in the 75th or greater growth percentile (68% compared to P.S. 30's 45%), suggesting that P.S. 114 has gained more ground in its efforts to help students below grade level progress to grade level.

Comment 39 (c) suggests it will be difficult to measure success in the new school because it will not serve testing grades in 2011-2012. The replacement school, P.S. 354, would receive an Early Childhood Progress Report after 2012-2013 when the school served grades PK-3, and then an Elementary Progress Report after the 2013-2014 school year when the school served grades PK-4. However, P.S. 30 will be reviewed informally yearly, as are all schools. The new school will also be reviewed yearly by the District 28 superintendent. Additionally, the school would likely have a Quality Review prior to receiving a Progress Report grade. Finally, each year the school would receive results of the yearly NYC School Survey.

Comment 40 suggests that P.S. 30 should not be held accountable for standards-based writing due to the students' low writing levels. However, state standards are scaffolded, which means that standards appear in different levels of rigor for different grade levels. Therefore if students are behind grade-level, they can still be taught lessons that are standards-based by beginning with the appropriate level standards and then building up to higher levels of rigor to progress to grade-level standards.

Comment 41 includes an action plan from the P.S. 30 staff. The DOE recognizes that the staff is committed to turning the school around, but as described above, based on its prior performance, the DOE does not feel confident that the school can implement these measures and achieve dramatically different results from those in past years. Also, the DOE believes these efforts have been proposed too late, since the school has been on the decline for years and this plan was first shared after the DOE published the phase-out and replacement proposals. However, the DOE supports the adoption of elements of this plan as they pertain to supporting grades three, four, and five as they phase out in the coming years.

Comment 44 suggests the community should organize against the phase-out and replacement proposals. This comment does not require analysis.

Comment 45 addresses the struggles at P.S. 30 over the years and requested more choice schools and for the DOE to improve P.S. 30. The DOE is working to increase the number of choices available to its students, as well as its students' access to these choices. Regarding the improvement of P.S. 30, the DOE does not believe the school is capable of turning around, but anticipates that the replacement of the school will create more choice and high quality options for the surrounding community.

Changes Made to the Proposal

No changes have been made to this proposal.