



### **Public Comment Analysis**

Date: February 2, 2011

Topic: The Proposed Phase-out of P.S. 102 Joseph O. Loretan (12X102)

Date of Panel Vote: February 3, 2011

---

### **Summary of Proposal**

P.S. 102 Joseph O. Loretan (12X102, “P.S. 102”) is an existing zoned elementary school located at 1827 Archer Street, Bronx, NY 10460, in Community School District 12. P.S. 102 is located in School Building X102 (“X102”). P.S. 102 currently serves students in Kindergarten through fifth grade and offers a Pre-Kindergarten program. P.S. 102 is co-located with one other school: Bronx Little School (12X691, “Bronx Little”), an unzoned district “choice” elementary school, which serves students in Kindergarten through fifth grade and also offers a Pre-Kindergarten program. The New York City Department of Education (“DOE”) is proposing to phase out and eventually close P.S. 102 based on its poor performance and the DOE’s assessment that the school lacks capacity to turn around quickly to better support student needs. The educational impact statement (“EIS”) describing this proposal was published on December 17, 2010, amended on December 29, 2010, and a second amended EIS was published on January 24, 2011. The EIS, amended EIS and second amended EIS are available at the following link <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Feb32011Proposals>, and hard copies are available in the P.S. 102 main office.

If the phase-out is approved, P.S. 102 would no longer admit students in Kindergarten, first grade, or second grade, and the school would no longer offer a Pre-Kindergarten program after the conclusion of the 2010-2011 school year. Current students in grades three, four, and five would continue to be served by P.S. 102 and supported as they progress toward completion of elementary school at P.S. 102. The school would serve one grade less each subsequent year until it completes its phase-out in June 2014.

Students in grades K-2 would be served in one of two new zoned elementary schools proposed to be opened in the P.S. 102 building: 12X531 or 12X536. Students in grades K-2 would also have access to Bronx Little, which is currently a district choice elementary school for District 12, but which will begin offering priority to students zoned to P.S. 102 in its admissions process.

After completing a comprehensive review of P.S. 102, the DOE believes that only the most serious intervention—the gradual phase-out and eventual closure of P.S. 102—will address the school’s

longstanding struggles and allow for new school options to develop in school building X102 that will better serve future students and the broader community.

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

A joint public hearing regarding this proposal was held at P.S. 102 Joseph O. Loretan on January 25, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 340 members of the public attended the hearing, and 49 people spoke. Present at the meeting were District 12 Superintendent Myrna Rodriguez; P.S. 102 Principal Tanyua Trezevantte; P.S. 102 School Leadership Team (“SLT”) representative Valerie Rowe; District 12 President’s Council representative Wilfredo Pagan; Bronx Little School Principal Janice Gordon; Citywide Education Council (“CEC”) 12 President Carmen Taveras and member Winifred Coulton; a representative of Senator Ruben Diaz, Luis Sepulveda; a representative of Assembly Member Peter Rivera, Daniel Figueroa III; and City Council Member Annabel Palma. The DOE representatives included, Deputy Chancellor Shael Palakow-Suranksy, Facilitator Anthony Conelli, and Network Leader Petrina Palazzo.

#### **The following comments and remarks were made at the joint public hearings:**

1. CEC 12 President Carmen Taveras stated that the departure of former principal Hill was responsible for the school’s recent poor performance.
2. P.S. 102 SLT member Valerie Rowe stated that P.S. 102 lacked sufficient resources and support, specifically from Principal Trezevantte and that the school does not meet the requirements for phase-out because it neither received three consecutive “C” grades on Progress Report nor a “D” nor an “F” grade on its most recent Progress Report. She also stated that Principal Trezevantte prevented the SLT from creating a Comprehensive Education Plan for the school. She claimed that Principal Trezevantte requested faculty to alter students’ IEPs to avoid hiring necessary teachers and provided insufficient professional development for special education teachers, amongst other allegations of principal mismanagement. Finally, she stated that the DOE did not contact the SLT regarding this proposal.
3. Luis Sepulveda, a representative of Senator Ruben Diaz, stated that the principal is responsible for the school’s struggles, and thus the school should not be closed.
4. District 12 Presidents’ Council representative Wilfredo Pagan stated that parents should support each other and the students and that phasing out P.S. 102 is not necessarily the solution to P.S. 102’s troubles.
5. City Council member Annabel Palma stated that P.S. 102’s parents seem involved and that the phase-out could lead to overcrowding at neighboring schools. Also, she stated that the resources that would be spent on opening new schools should be allocated to P.S. 102’s school leadership. She stated that the school’s recent Progress Report grades do not necessitate phase-out.
6. Daniel Figueroa, a representative of Assembly Member Peter Rivera, stated that the DOE did not seek feedback from sufficient community members, particularly from the Bronx Little School’s community. He also stated that he believes this decision has already been made and that nothing that happens in this hearing will change that.
7. Multiple commenters stated that the school failed because of school leadership mismanagement and because the DOE did not take action to address this mismanagement.

8. Multiple commenters stated that the P.S. 102 staff was not given sufficient professional development nor sufficient support, such as a dedicated special education administrator, early academic intervention services, or English as a Second Language (“ESL”) instructional materials, to prepare to serve the high number of students with disabilities, who live in poverty, are the children of migrant workers, or are English Language Learner (“ELL”) students.
9. Multiple commenters stated that the DOE did not provide sufficient support to P.S. 102.
10. Multiple commenters stated that the school frequently changed reading programs, leading to inconsistent instruction.
11. One commenter stated that the school has close ties to the community and that the school’s arts program is an unnoticed achievement for the school.
12. One commenter advocated for greater involvement from the school’s teachers and parents.
13. One speaker asked about the availability and allocation of funds for ELL programs from 2005-2010.
14. One speaker asked about who creates the Comprehensive Educational Plan (“CEP”).
15. One speaker asked about the DOE’s training for the online system for special education.
16. One speaker asked if teachers are responsible for providing printer toner.
17. The DOE received a question about the support provided for the ELL population and availability of an ELL specialist.
18. The DOE received a question about how student discipline is handled at the school.
19. The DOE received a question about what happens to the students if the proposal is passed.
20. The DOE received a question about whether the leadership would change if the proposal is passed.
21. The DOE received a question about existing space allocation in the school.
22. Multiple commenters stated that the DOE does not respect or understand the P.S. 102 community because neither translation services nor a translated version of the EIS were provided at the hearing.

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

The DOE received 11 written comments by e-mail and four comments by telephone. One of the e-mails included a link to a video segment that included testimonials by four teachers. Those comments are also included below.

1. Multiple commenters stated that the school failed because of school leadership mismanagement and because the DOE did not take action to address this mismanagement.
2. Multiple commenters asked that P.S. 102 not be phased out.
3. Multiple commenters spoke about a sense of community and collaboration among current staff in spite of a lack of support and a negative environment from the current school leadership. Commenters also stated their concern that staff members, curriculum coaches, and administrators were not able to communicate with each other or train one another after professional development sessions.

4. Multiple commenters stated that there was a lack of resources at the school, including the absence of professional development opportunities, certain staff positions, extracurricular offerings such as Saturday Academy, a consistent reading program, and additional support for students in the lower elementary grades.
5. Multiple commenters raised concerns about school leadership mismanagement, including staff members working outside their specialized licenses at the school, the placement of long-term substitutes in teaching positions, the unavailability of a recently purchased “Guided Reading” library to teachers, the absence of a teacher handbook for the 2010-2011 school year, and a ban on weekly homework sheets. A commenter also questioned why the principal did not attend Core Knowledge principal meetings and sent the literacy coach in her place.
6. A commenter stated that former school leaders helped the school achieve past success.
7. A commenter asked why school leadership did not develop and implement an action plan based on the 2009-2010 Quality Review and questioned why the DOE did not hold school leadership accountable for such plans.
8. A few commenters asked why the principal was allowed to remain principal of P.S. 102 while the school phased-out.
9. One commenter asked the names of the Panel for Educational Policy members who will be deciding the fate of P.S. 102.
10. One commenter asked whether any members of the Panel for Educational Policy had visited P.S. 102.
11. One commenter, a teacher, noted that teachers at the school emphasized early academic intervention services for students in grades K-2. Currently, only students in grades 3-5 receive additional supports. The commenter believes that if P.S. 102 is phased-out, students will not receive the help that they need.
12. One commenter asked why moneys were made available on the Friday after the joint public hearing for special education teachers, the bilingual coordinator and ink at the school.
13. Annabel Palma, Council Member, 18<sup>th</sup> District sent a letter to the DOE stating that teachers and advocates had reached out to her office and identified three DOE deficiencies which caused schools to fail: (i) insufficient support services (e.g., insufficient support for non-English language speakers, insufficient special education programming, too few teacher aides, etc.), (ii) insufficient management accountability/DOE oversight (e.g., lack of principal accountability) and (iii) failure to establish and foster community involvement.
14. The DOE received a comment concerning all phase-out proposals calling for a moratorium on school closings, which stated that the DOE is the servant of the people and is not acknowledging the community’s opposition to these proposals. The commenter suggested a facilitated discussion process which would work towards consensus.

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

- Joint Public Hearing comments 1, 2, 3, 7 and written/oral comments 1, 5, and 13 concern the alleged mismanagement by the current principal (and a former principal) at P.S. 102, which purportedly led to low performance. The current P.S. 102 principal has been in place since 2005.
  - With respect to supporting school leadership, the DOE offered to help the principal develop the school’s Comprehensive Educational Plan and set school-wide goals, as well as provided opportunities for administrators, coaches, and data specialists to collaborate with colleagues to learn effective practices that could be replicated at P.S. 102. With respect to instructional support, the DOE offered training for the principal, assistant principals, coaches, and data specialist on the new state curriculum and ways to improve instruction. Furthermore, the DOE placed a new assistant principal (“AP”) at the school, with extensive experience serving English Language Learners (ELLs). The AP has been helping staff implement new strategies to meet these students’ unique needs.
  - In addition the CFN has taken several measures to support the principal such as one-on-one support for budgeting, human resources, recruiting and retaining talented teachers, building management, and operational compliance on an ongoing basis.
  - Some commenters suggested that the DOE should take action to address school mismanagement, not phase-out the school. The DOE believes that based on the schools’ performance, a change in leadership would not be sufficient to turn around the school. Only P.S. 102’s phase-out and replacement with two new zoned elementary schools in the X102 Building will provide the community with better options.
- Joint Public Hearing comments 2, 4, and 5 and written/oral comment 2 contend that P.S. 102 does not meet the requirements for phase-out because it did not receive three consecutive “Cs” or a D or an F on its most recent Progress Reports.
  - As explained in the EIS describing the proposed phase-out of P.S. 102, a Quality Review rating of “Undeveloped with Proficient Features”, which P.S. 102 earned in its 2009-2010 Quality Review report, can trigger a comprehensive review of a school to determine what intensive supports and interventions would best benefit its students and the community. After completing that review, the DOE believes that only the most serious intervention—the gradual phase-out and eventual closure of P.S. 102—is the action we must take to best serve students in the community.
- Joint Public Hearing comment 2 states that the DOE did not contact the P.S. 102 SLT regarding this proposal. In fact, the DOE spoke to the SLT about potential interventions on October 19<sup>th</sup> during its investigation of the school. Additionally, the school’s SLT was e-mailed the proposal on the day it was originally released, December 17, 2010. The SLT was also notified when the EIS was amended on December 29, 2010 and amended a second time on January 24, 2011.
- Joint Public Hearing comment 5 suggests that other neighboring schools will become overcrowded as the result of the phase-out of P.S. 102. The DOE does not anticipate that

other schools will become overcrowded due to the phase-out of P.S. 102. If the proposals to phase-out P.S. 102 and co-locate 12X531 and 12X536 are approved, enrollment options for students zoned to P.S. 102 are as follows:

- Kindergarten and first grade students zoned to P.S. 102 would be guaranteed a seat in 12X531 or 12X536.
  - Second, third and fourth grade students would continue at P.S. 102. After students complete fifth grade, they would participate in the Middle School Choice process and enroll in sixth grade at a middle school of their choice.
  - Next school year, P.S. 102 would serve students in grades three, four, and five. Then, during the following school year, P.S. 102 would serve students in grades four and five. Finally, during the 2013-14 school year, P.S. 102 would only serve students in grade five. Phase out would be complete in June 2014.
  - In addition, students may apply to Bronx Little, which will offer priority to students zoned for P.S. 102.
  - The 910 total K-5 seats in District 12 eliminated by P.S. 102's phase-out and eventual closure would be recovered through the eventual phase-in of 1,000-1,100 new seats offered by the two new zoned schools proposed to be co-located in the building. As a result, the proposal to phase out P.S. 102 is not expected to yield a net loss of seats in X102 or District 12.
- Joint Public Hearing comment 5 also suggested that resources spent on new schools should be allocated to P.S. 102's school leadership instead. The DOE believes that the investment in new schools will best serve the students and community.
  - Joint Public Hearing comment 6 contends that the DOE did not seek sufficient feedback on the proposal, particularly from Bronx Little, the school with which P.S. 102 is co-located. The DOE spoke to members of the P.S. 102 community during the investigation of the school. Furthermore, the DOE addressed the impact of the phase-out of P.S. 102 on Bronx Little in the EIS.
    - The commenter also contended that the DOE has made its decision about the phase-out already and nothing said at the hearing would change the DOE's decision. The DOE's decisions are not final until they are voted on by the Panel for Educational Policy ("PEP"). The comments contained in this analysis will be provided to the PEP for its consideration prior to its vote on this proposal on February 3, 2011.
  - Joint public hearing comments 2, 8 and 9 and written/oral comments 4 and 13 state that the DOE did not provide enough instructional support, professional development, supplies, or resources. In fact, the DOE offered the following supports to P.S. 102:
    - Leadership Support:
      - Placing a new Assistant Principal ("AP") at the school; the new AP has extensive experience serving English Language Learners (ELLs) and has been helping staff implement new strategies to meet these students' unique needs.
      - Offering to help the principal in developing the school's Comprehensive Educational Plan and setting school-wide goals.
      - Offering opportunities for administrators, coaches, and data specialists to collaborate with colleagues to learn effective practices that could be replicated at P.S. 102.

- Instructional Support:
  - Training for the principal, assistant principals, coaches, and data specialist on the new state curriculum and ways to improve instruction.
  - Professional development for coaches and data specialists on planning, aligning curriculum across subject areas and grade levels, data analysis, and how to individualize instruction.
  - Professional development targeted at supporting the work of teacher teams engaged in inquiry with a focus on meeting the needs of student subgroups and students performing below grade level.
  - Offering to provide on-site training for teachers by math and literacy experts.
  
- Operational Support:
  - Helping to secure and implement a \$30,000 Coordinated Early Intervening Services grant.
  - One-on-one support for the principal and staff on budgeting, human resources, all operational areas, and compliance issues.
  - Helping the school work with other campus schools to ensure coordinated use of facilities and shared spaces.
  
- Student Support:
  - Assigning a dedicated attendance teacher to develop plans to improve student attendance.
  - Offering support as part of the Coordinated Early Intervening Services grant to reduce suspension rates.
  - In the 2006-2007 school year, P.S. 102 was awarded a Comprehensive School Reform Grant. As a result of this grant, Core Knowledge (a pedagogical system with a proven track record in the areas of science, visual arts, social studies, and music) was implemented and the school received approximately \$250,000-\$300,000 per year for approximately three years to support implementation.
  
- The DOE also makes available the following supports to schools around safety and security:
  - 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 NYPD)
  - Technical assistance when incidents occur via the Borough Safety Directors
  - Professional development and support to CFN Safety Liaisons
  - Professional development and kits for Building Response Teams
  - Monitoring and certifying School Safety Plans annually

Given P.S. 102's lack of success despite the above supports—whether as part of a centralized effort to support all schools or an individualized plan for P.S. 102—it is apparent that P.S. 102 has failed to develop the proper infrastructure to meet the needs of its students and families.

- Joint Public Hearing comment 8 notes that P.S. 102 has a large number of ELL students, students with disabilities and children who live in poverty. Like many of our schools, P.S. 102 serves a high-need population: 13% of students require special education services and 21% are English language learners. In 2009-2010, only 28% of P.S. 102's students were performing on grade level in math, and only 25% of its students were performing on grade level in English. But other schools serving similar students have achieved far better results. These include schools in P.S. 102's peer group, representing the 40 most similar schools in New York City. Like P.S. 102, the schools below are all eligible for Title 1 funding during the 2010-2011 school year.
  - At P.S. 86 Kingsbridge Heights, another Bronx school, 10% of students require special education services and 31% of students are English language learners. At that school, 58% of students are on grade level in math and 41% are on grade level in English.
  - At P.S. 152 The Evergreen School, another Bronx school, 9% of students require special education services and 24% of students are English language learners. At that school, 52% of students are on grade level in math and 35% are on grade level in English.
  - At P.S. 172 The Beacon School of Excellence, a Brooklyn elementary school that is also in P.S. 102's peer group, 8% of students require special education services and 31% of students are English language learners. P.S. 172 received the highest overall progress report score of any elementary school in New York City, with a remarkable 98% of students are on grade level in math, and 94% are on grade level in English.

While all students are still not where we'd like them to be, these schools are getting far better results while serving a similar mix of students to P.S. 102.

- Joint Public Hearing comment 10 notes that the school frequently changes its reading program. The school administration makes decisions about the literacy curriculum. The Core Knowledge program is also a pilot program at P.S. 102. Core Knowledge is used with students in grades K-2 in the current school year.
- Joint Public Hearing comment 11 notes that P.S. 102's arts program is an achievement for P.S. 102. P.S. 102 would continue offering these options, but the number and range of programs offered may gradually diminish due to declining student enrollment as the school phases out. 12X531 and 12X536 may offer comparable arts programs depending on demand.
  - This comment also notes that the school has strong ties to the greater community. The DOE believes that the two new zoned elementary schools it has proposed to replace P.S. 102 will also develop ties to the community over time.
- Joint Public Hearing comment 12 advocates for greater teacher and parent involvement. The DOE supports teacher and parent involvement in all aspects of their students' education.
- Joint Public Hearing comment 13 was a question about ELL programs from 2005-2010. The Network leader responded that each school is provided additional support for English

Language Learners and the school administration works with the school leadership team to ensure that funds are spent to support those students.

- Joint Public Hearing comment 14 was a question about who creates the CEP. The Network leader responded that the principal writes the CEP in collaboration with the school leadership team. In the 2009-2010 school year, this support was offered to principals in small group and 1-to-1 sessions. In the 2010-2011 school year, this support was offered to principals in 1-to-1 sessions.
- Joint Public Hearing comment 15 was a question about the DOE's training of staff to use the online system for special education, Special Education School Improvement Specialists ("SEISIS"). The Network leader responded that the training was organized centrally as a professional development opportunity. Due to the large number of schools throughout the system, there were only three people were allowed to attend from each school. Individuals who attended the training were supposed to train the teachers at their schools.
- Joint Public Hearing comment 16 was a question about whether teachers are responsible for providing printer toner at a school. The Network leader responded that printing supplies for classroom instruction purposes should be purchased by the school.
- Joint Public Hearing comment 17 and written comment 13 concern the availability of supports for the ELL population at P.S. 102. The Network leader responded that the Leadership Support Organization was the support structure from 2007 to 2010. In those years, the school was provided with a catalogue of professional development opportunities. There were a minimum of 8 PD series focused on ELLs. Customized support was offered directly to each school to push in these supports to teachers. In the 2010-2011 school year, the Children's First Network ("CFN") contracts directly with an ELL specialist. The support takes two forms: a professional development program for teachers where they attend a series of 5 sessions focused on ELLs and CFN supports for teachers at the school.
- Joint Public Hearing comment 18 was a question about how student discipline is handled in the school. The Network leader responded that prior to the current school year, discipline was handled centrally by the Office of School and Youth Development. As of 2010-2011, the CFN supported the school with a \$30,000 grant which was intended to reduce the number of suspensions and help to address discipline problems. Please refer to Chancellor's Regulation A-443 for more information concerning student discipline procedures (available at <http://docs.nycenet.edu/docushare/dsweb/Get/Document-22/A-443.pdf>).
- Joint Public Hearing comment 19 was a question about what will happen if the proposal is passed. The Deputy Chancellor answered that current P.S. 102 students will remain in the building if the proposal is approved and will either continue at P.S. 102, attend Bronx Little or attend one of the two new schools in the building. For more information, please refer to the response to Joint Public Hearing comment 5. Please also see pages 8-11 of the second amended educational impact statement, posted on January 24, 2011, describing the proposed phase-out of P.S. 102 (available at [http://schools.nyc.gov/NR/rdonlyres/22FABAD6-4CC8-4344-A5D0-89495DF1FF48/0/EIS\\_PS102\\_PO\\_Second\\_Amended\\_vfinal.pdf](http://schools.nyc.gov/NR/rdonlyres/22FABAD6-4CC8-4344-A5D0-89495DF1FF48/0/EIS_PS102_PO_Second_Amended_vfinal.pdf)).
- Joint Public Hearing comment 20 and written/oral comment 8 concern whether the leadership at the school would change if the proposal is passed. The Deputy Chancellor

answered by saying that decisions about school leadership would be made as a result of the input and conversations the DOE was having with the school community. At this point, no decision has been made about changes in school leadership at P.S. 102.

- Joint Public Hearing comment 21 was a question about the existing space allocation in the school. The Deputy Chancellor answered that there are currently two schools in the building: P.S. 102 and Bronx Little. If the proposals to phase-out P.S. 102 and co-locate 12X531 and 12X536 are approved, next year, there will be two new schools phasing-in, as P.S. 102 begins to gradually phase-out. The systems that need to be in place for new schools include room allocations, a principal for each school, a faculty for each school and enrollments set for approximately half of P.S. 102's current enrollment. For more detailed information concerning the allocation of space in X102, please see pages 11-12 of the second amended EIS describing the proposed phase-out of P.S. 102.
- Joint Public Hearing comment 22 contends that the DOE does not respect the P.S. 102 community because neither translation services nor a translated version of the EIS was available at the hearing. In fact, Spanish interpretation was provided during the joint public hearing, and a Spanish version of the EIS is available on the DOE's website: [http://schools.nyc.gov/NR/rdonlyres/ED9F6D74-174C-4C7E-9BAB-EA88FB1D456B/0/EIS\\_PS102\\_PO\\_Amended\\_v01\\_Spanish.pdf](http://schools.nyc.gov/NR/rdonlyres/ED9F6D74-174C-4C7E-9BAB-EA88FB1D456B/0/EIS_PS102_PO_Amended_v01_Spanish.pdf).
- Written/oral comment 3 notes that there is a sense of community and collaboration among current staff despite the negative environment created by the school leadership. The DOE will continue to support teachers and P.S. 102 staff to foster a collaborative environment as the school phases out.
- Written/oral comment 6 states that former school leaders helped the school achieve success. The comment does not identify a specific former leaders making it difficult for the DOE to respond. The DOE believes that recent trends in school performance warrant a phase-out.
- Written/oral comment 7 asks when the school leadership did not develop an action plan based on the 2009-2010 Quality Review and asked why the DOE did not hold school leadership responsible. As a result of the Quality Review, the CFN offered P.S. 102 support in the form of professional development sessions to connect administrators, coaches, and data specialists with other schools. In addition, professional development was offered for coaches and data specialists in aligning curriculum across subject areas and grade levels, data analysis, and how to individualize instruction.
- Written/oral comment 9 was a question about the names of the members of the Panel for Educational Policy. The list of members can be found on the DOE's website: <http://schools.nyc.gov/AboutUs/leadership/PEP/members/default.htm>
- Written/oral comment 10 was a question about whether any members of the Panel for Educational Policy had visited P.S. 102. The DOE is not aware if any PEP members have visited P.S. 102
- Written/oral comment 11 concerns early academic intervention. The CFN will continue to support P.S. 102 by offering instructional and curricular supports to struggling students as the school phases-out.
- Written/oral comment 12 was a question about why moneys were made available on the Friday after the joint public hearing for special education teachers, the bilingual coordinator and ink at the school. In the last weeks, P.S. 102 received a \$30,000 Coordinated Early Intervening Services ("CEIS") grant, a Joint Intervention Team

(“JIT”) grant from the City/State for \$90,000, a Schools in Need of Improvement (“SINI”) grant and a supplemental grant from the city.

- Written/oral comment 14 was concerning all phase-out proposals and calls for a moratorium on all school closings. With regards to this comment, the central goal of the Children First reforms is to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school – led by a dedicated leader with a vision for student success. To ensure that as many students as possible have access to the best possible education, since 2003 New York City has replaced 91 of our lowest-performing schools with better options and opened 474 new schools: 365 district schools and 109 public charter schools. As a result, we’ve created more high-quality choices for families.

Based on feedback from communities in 2009 and 2010, the DOE made improvements to its timeline and process for communicating with schools and families early and often throughout the investigation and decision making process. This year, we talked to school leadership, parents, SLTs, CECs, elected officials, and local CBOs about our ideas about how to improve struggling schools. We convened these meetings to discuss our proposals and to hear feedback and new ideas.

The Department developed and distributed “Fact Sheets” for each school we talked with. These fact sheets described proposals, the rationale behind them, included relevant data, and provided clear instructions for how to offer feedback. They were posted on our website and distributed at meetings.

When we announced the Department’s recommendation to propose the school for phase out, dedicated teams of educators and engagement specialists spent several days back in these schools meeting with teachers, parents, and students.

In January, Joint Public Hearings were held for all proposals and public feedback was collected at these meetings and through dedicated email and phone numbers. The Department’s analysis of public comment is contained in this document.

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

No changes have been made to this proposal as a result of public comment.