



Public Comment Analysis

Date: January 31, 2011

Topic: The Proposed Phase-out of Paul Robeson High School (17K625)

Date of Panel Vote: February 1, 2011

Summary of Proposal

Paul Robeson High School (17K625, “Robeson”) is an existing high school located at 150 Albany Avenue, Brooklyn, NY 11213, within the geographical confines of Community School District 17. It currently serves students in grades nine through twelve. The New York City Department of Education (DOE) is proposing to phase out Robeson based on its poor performance and the DOE’s assessment that the school lacks the capacity to turn around quickly to better support student needs.

If this proposal is approved, Robeson would no longer admit new ninth-grade students after the conclusion of the 2010-2011 school year. Current students would be supported as they progress towards graduation while remaining enrolled in Robeson. In cases where students do not complete graduation requirements by June 2014, the DOE will help students and families identify alternative programs or schools that meet students’ needs so that they may continue their high school education after Robeson completes phasing out.

Robeson is located in Building K625, which also houses the Living for the Young Family through Education program (“LYFE”). In 2009-2010, Building K625 had a target capacity of 1,112 students, and the building enrolled 868 students, yielding a target utilization rate for 2009-2010 of 91% of total capacity. The school currently serves 651 students. In 2010-2011, the estimated target utilization rate for the building was 58%. This means that the building is “underutilized” and has extra space to accommodate additional students. The DOE anticipates proposing the co-location of two high schools in the building beginning in 2011-2012. These proposals are described in Educational Impact Statements that the DOE released on January 15, 2011. The DOE anticipates that a proposed new high school, 17K122, would begin phasing into the K625 campus with a ninth-grade class entering in September 2011. This new school would continue to expand as Robeson phases out and would reach full scale during the 2014-2015 school year, at which point it would serve students in grades 9-12. Additionally, the DOE will propose to re-site an existing school, Academy for Health Careers (13K751), to the K625 building in 2011-2012. The details of this proposal have been released in an Educational Impact

Statement which can be accessed here:

<http://schools.nyc.gov/community/planning/changes/brooklyn/default.htm>

During Robeson’s phase-out and the new school’s gradual phase-in, the three schools would be co-located in K625. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at Paul Robeson on January 21, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 132 members of the public attended the hearing, 58 people spoke and 5 questions were submitted. Present at the meeting were: Interim Acting Robeson Principal Katherine Kefalas, Community Education Council (“CEC”) 17 representative Charmaine Griffith; Robeson School Leadership Team (“SLT”) members Stefanie Siegel, Anna Torres, Cicily Humes-James, Jadzia Malinowski, PTA President Kenneth Moore; and Citywide Council on High Schools (“CCHS”) representative Valerie Armstrong-Barrows; Deputy Chancellor John White; Brooklyn High School Superintendent Karen Watts; and Director of the Office for Family Information and Action Ojeda Hall.

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

1. The PTA President of Robeson stated:
 - a. The school prepares children for college and teachers work hard. The school is doing what it is supposed to do. Why close it?
 - b. What will this community do when they cannot send children to this school? If this school becomes a charter school, will families have to participate in a lottery to attend?
 - c. Since the school has been proposed for phase out, students have become less motivated to come to school and funders have withdrawn support from the school.
2. Jadzia Malinowski, SLT member of Robeson stated:
 - a. The school has made progress and should not be phased out. The DOE does not look at progress, it only looks at statistics.
 - b. Instead of closing schools, the DOE should help schools. Instead of spending money on consultants and other projects, the DOE should help schools.
3. Stephanie Siegel, SLT member of Robeson read a resolution opposing the closing of Robeson and stating:
 - a. Robeson has served the Crown Heights/Brownsville/East New York and Bedford Stuyvesant communities for over two decades, by preparing many students for education, citizenship and participation in the workforce
 - b. Robeson is one of few remaining large, comprehensive high schools in Brooklyn educating students with a range of academic experiences and social challenges

- c. The DOE has not provided necessary support, including professional development assistance targeted to the needs of Robeson students which it previously agreed to provide.
 - d. The DOE's previous decision to close neighboring Wingate, Thomas Jefferson, Erasmus Hall, and Prospect Heights high schools has limited the enrollment options for residents of central Brooklyn with the greatest academic and social needs. As a result, enrollment of students with greater academic needs, special education students, especially students in the most restrictive settings, English Language Learners, over-aged and under-credited students, and students living in poverty at Robeson has increased. The DOE has not provided the necessary funding, resources or professional development to effectively educate these students.
 - e. Despite morale and resource challenges, Robeson students are making progress. The percentage of first-year students accumulating ten credits or more has increased from 58 to 64 percent, and the four year graduation rate has increased ten percentage points over the past year. The school's Progress Report performance grade improved from a D to a C and its progress grade improved from a C to a B. The school received a Proficient on its latest Quality Review.
 - f. Given the academic progress described above, the DOE has not followed its own standards in proposing to phase out Robeson.
 - g. The DOE has not provided a comprehensive plan for replacing these high school seats, therefore the phase out of Robeson will have a negative impact on the community by causing overcrowding and an increase in enrollment of higher-need students at other neighboring schools including Boys and Girls, Acorn, and Medgar Evers high schools.
 - h. Robeson has successful educational programs including a five-year federal grant for small learning communities, and partnerships with Citigroup, Reach Out, and others. Robeson has Career and Technical Education (CTE) programs including Finance, Information Technology, Entrepreneurship and New Media. These CTE programs are not available in many other schools in the borough. Students pursuing CTE sequences may lose credits because CTE credits do not transfer from one program to another.
 - i. New York State designated Robeson a Persistent Lowest Achieving school, allowing the DOE to implement a turnaround or transformation model in the school.
 - j. Because schools are often stable forces in a neighborhood, the DOE should close a school only when all other measures have been tried and have been exhausted. This demonstrates mismanagement of Robeson and other schools by the DOE.
 - k. Robeson students, families, staff, and the Brooklyn community have clearly stated their opposition to the closure and have called upon the DOE to retract its plans to close the school and instead provide Robeson with additional resources to ensure students' academic success.
4. Cecily Humes, a representative of the Robeson SLT, stated:

- a. Phase out decisions cause school communities to suffer. There may be some schools that are struggling so much that the decision to phase out and close a school is the only option; Robeson is not one of these schools.
 - b. Despite overcrowding, violence, safety issues, insufficient support from the DOE and the network, and leadership challenges, many students at Robeson are making progress. Young parents graduate on time, the school participated in the United Nations Youth Leadership Conference and the Stock Market Game, Federal Challenge, and Virtual Enterprise Business Plan competition and trade show. Graduating seniors have won scholarships and are currently attending college.
 - c. According to a January 14, 2011 New York Times article, the DOE is moving forward with plans to replace the seats lost at Robeson. This demonstrates that the DOE has barely fulfilled the legal mandate to have a public hearing and a vote by the Panel for Educational Policy prior to closing a school and replacing it.
5. Charmaine Griffith, a representative of CEC 17, stated that CEC 17 is not in favor of phasing out Robeson. CEC 17 supports restructuring Robeson and keeping it open for students in District 17.
6. New York State Assemblywoman Annette Robinson stated that:
 - a. Her grandson graduated from Robeson and went on to receive two Master's degrees.
 - b. She wrote a letter to the previous Chancellor Joel Klein, opposing the proposal and requesting appropriate resources for the school.
 - c. She provided a technology resource room. Under the leadership of Dr. Marcia Lyles, the school made progress.
 - d. The New York State Council of Black Elected Democrats, of which she is chairperson, hopes that the DOE will use the transformation model instead of phasing out the school.
 - e. Parents, teachers, and children do not have a voice. Children are not statistics. Education is not a business.
 - f. Charter schools also have challenges.
 - g. The DOE should look at all of these issues before making any plans to close a school.
7. Robert Carnegie, a representative on behalf of New York City Councilman Albert Vann, stated:
 - a. Phasing out schools has serious consequences and is not a solution for the many problems our public education system faces.
 - b. Robeson has been an important institution in central Brooklyn for many years. The school has partnered with Princeton University, Medgar Evers College, Temple University, Citigroup, and the Councilman's office, among others. Robeson gives students internship opportunities and opportunities to participate in special projects such as the New York Exchange Game and the United Nations Global Warming Project.
 - c. Robeson serves a high proportion of struggling students, including students who scored at Level 2 or below on the eight grade English Language Arts ("ELA") and

math tests, students who are homeless or are parents, formerly incarcerated students, and special education students. Last year, 80% of entering students were at Level 1 or 2 and many students entered the school through the “Over-the-Counter” enrollment process and were under-credited. Robeson did not receive additional resources from the DOE to support these students.

- d. A few years ago, the school was over capacity and the DOE proposed to phase out Robeson then as well, calling it a failing school. The DOE’s intention to phase out the school discouraged new students from attending the school, and therefore the school struggled to attract incoming freshmen. In this proposal to phase out the school, the DOE states that demand for the school is low, without taking into account why demand may be low. Despite these challenges, the school has improved. 95% of English Language Learners were proficient, compared to less than 59% the previous year. The graduation rate, attendance rate, Regents scores, and Quality Review results were positive. The school engaged the company Pearson to evaluate the school’s practices and help improve the school. The school has capacity to improve.
 - e. The DOE should provide the school with federal funding such as Race to the Top funds. The DOE should convey a message of hope to children. The Councilman opposes the phase out of Robeson. The system works when it is supported.
8. Anne Marie Henry Stevens, Robeson Assistant Principal and SLT member commented that Robeson received a C on its Progress Report this year, the same grade as Boys and Girls High School, John Dewey High School, and Sheepshead Bay High School. Robeson has a similar graduation rate and school environment Progress Report grade to other schools which are not being phased out. Why is Robeson being phased out when similar schools are not and are improving?
 9. Valerie Armstrong Barrows, the Brooklyn representative to the Citywide Council on High Schools, stated:
 - a. Four years ago, there were no hearings for phase outs. Now that there are hearings, is there going to be meaningful consideration of students’ needs?
 - b. Where do children go after phase out is implemented? Are students getting the supports and career guidance that they need from the DOE?
 - c. If all the schools are small individualized schools and charter schools, where will children with Individualized Education Plans or English Language Learners go?
 10. Multiple commenters noted that Robeson has many notable achievements, including:
 - a. The 5-year graduation rate is 70%.
 - b. The school had made progress in Math, English, and its graduation rates and attendance has improved. The school was rated proficient on all areas but one on the Quality Review.
 11. Multiple commenters noted that Robeson serves many struggling students, including over-aged and under-credited students.

12. Multiple commenters noted that Robeson has not been provided with sufficient resources and supports. They further stated that with support the school can improve.
13. A commenter noted that New York City graduates an average of 28% of African-American and Latino students, but Robeson graduates 50%. Why would the DOE want to close Robeson with this record?
14. Multiple commenters discussed a New York Times article from January 14, 2011 which suggested that the DOE had moved ahead with proceeding to phase out Robeson as if it had already been decided. Commenters also stated that the DOE made the decision to put an IBM charter school in the building without input from the community.
15. Multiple commenters described strong existing programs at Robeson, including:
 - a. A college awareness program partnership with a group of Princeton graduates.
 - b. A Virtual Enterprise Program.
 - c. College for Every Student, which helps students prepare for the college process.
 - d. Global Kids, an after school program that helps with attendance.
 - e. Public School Athletic League sports teams.
 - f. City Mentee.
16. Multiple commenters discussed the supports that the EIS for this proposal stated that the DOE provided to the school.
 - a. A commenter stated that those supports listed in the EIS were in fact provided by the school, not the DOE. In particular, the commenter stated that these supports included training assistant principals, conducting observations, reviewing student work, and learning about accountability tools, but the school provided this training.
 - b. The school did not receive support from the DOE in developing the Comprehensive Education Plan (CEP).
 - c. The school has had four superintendents over the past four years.
 - d. A commenter asked: Does the Department of Education have actual dates and time frames that show that they supported Robeson as stated in the EIS?
17. Multiple commenters noted that the principal was removed, and this lack of leadership had a negative impact on the school. The school was without a leader for half of the year.
18. Multiple commenters discussed the DOE's statement that demand for the school is low. Commenters stated:
 - a. In 2005-06, the school had 1,500 students. Since then, the demand for the school has fallen. The school requested that the DOE send approximately 260 ninth graders. The school ranked 900 students, but only 100 students were sent to the school to enroll.
 - b. The DOE sent fewer students to the school because it wanted to phase out the school. Enrollment decreased and the budget decreased as a result of that, teachers were excessed and programs were cut.

19. A commenter stated that the DOE is phasing out large schools and replacing them with small schools to create more jobs for principals.
20. Multiple commenters discussed Paul Robeson, for whom the school is named. Commenters stated that Robeson was an important leader and role model. Closing a school named for a figure like this sends a negative message to children about their history.
21. Multiple commenters expressed concern for students currently enrolled at Robeson if the school phases out.
 - a. If the school is phased out, students not on track to graduate will need to transfer to other schools. These schools may be failing or may have limited supports.
 - b. What additional resources will be put in place to assist students in the transfer process and ensure that they stay in school?
22. Multiple commenters stated that Robeson teachers hold their students to high standards and teachers work hard.
23. Multiple commenters stated that Robeson is safer than other schools.
24. A commenter stated that in 1978 a strong principal at Alexander Hamilton High School was removed and the school was reorganized as Paul Robeson High School. The DOE will repeat this process again.
25. A commenter stated that changing the name of the school will not solve the problems of the community; the DOE needs to work with the community to improve the schools in the building.
26. Multiple commenters stated that the school has a strong history and many alumni have gone on to be successful in higher education and careers.
27. A commenter asked: Why isn't the school given more time to improve?
28. A commenter asked: If the schools continue to phase out, how can children be ensured a stable education?
29. A commenter asked: Why are children that are coming out of jail being sent to Robeson?

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

The following comments were received in a document titled "Robeson High School for Business and Technology, Response to Educational Impact Statement, January 2011".

30. How is our Capacity to turn around being measured? Last year, after the long-standing principal was removed, we made enormous gains in student achievement, as the

information below reflects. This year we came back to a new, inexperienced interim acting principal, placed in the school by the network without consultation with school leadership, a slashed budget, a significantly smaller staff, and continuing challenges with recruitment as we are subjected to vilification by the press. Yet, we have been moving forward towards a redesign plan. We are proposing that this school be given the opportunity to adapt a transformational model with the support of an organization like Pearson's School Turnaround Educational Program.

31. The DOE does not state when a comprehensive review took place. The experienced educators in our building were not engaged in such a review. It is true that since the previous principal was removed last February, CFN 305 has provided some support in decision-making and professional development. However, it has not been at the intensity or at the quality that a school in a state of crisis demands. We received only what other schools in the network received- nothing more. Robeson never received "intensive support from the DOE".
32. Progress for 2010-2011 has not been formally assessed yet, so how can the DOE determine that performance has continued to decline?
33. Paul Robeson's incoming classes have predominately been students who scored at level 2 and below on the New York State's 8th grade tests. We welcome these children; however we recognize that they need more time and additional support to graduate high school.
34. Robeson High School has made significant improvements in performance from 2007-2009 to 2009-2010. Based on this trend, one may predict that next year's results could exceed this year's performance. These gains are due to deliberate strategies implemented by the school and the department to assist our students to surpass their previous performances.
35. Robeson High School has an 81% attendance rate, not a 76% attendance rate. Additionally, Robeson has many students, some of whom enter through the over the counter process, who are new to the country, over-aged students and students who struggled academically in middle school. These are the issues that make the transition to high school even more challenging, causing some young people to stay home from school, especially in those cases where students do not have appropriate adult supervision. The DOE also makes it very difficult to remove students identified as Long Term Absences from the cohort. The special education population at Robeson is higher than the city average. When special needs students attend on a regular basis, we have been able to move them toward credit accumulation and graduation. Many of our students are from East New York in Brooklyn and may have extenuating circumstances that impact a student's quality of life.
36. If the weaknesses in the school noted by the Quality Review were so serious as to suggest "that the school is ill-equipped to turn around quickly to better support students", why were we not immediately given the necessary resources and assistance to address these areas and why wasn't the Principal held accountable in a way that produced real results?

37. In 2008 while 26% of teachers reported they did not feel order was maintained in the school, 74% felt it was maintained. The DOE data for 2010 is not correct. According to the 2009-2010 progress report survey, 59% (8% strongly agree; 51% agree) of teachers felt that order and discipline were maintained in the school. Additionally, 90% of teachers agreed that they feel safe in the school (26% strongly agree; 64% agree). Is this just another instance of the DOE creating a boiler plate document and forgetting to change certain facts as they changed the respective schools?
38. The DOE uses the decline in population as evidence that demand is falling. However, if we had not taken measures to cap incoming ninth grade classes, the school would have imploded. Furthermore, far too many students who were coming to us were not picking Robeson through the application process. The DOE's matching process is a mystery. Last year, students tried to choose Robeson and were told by the DOE placement Office that they should not consider Robeson; parents and staff members had to fight for these students to be admitted to our school. We have 335 applicants for the incoming class of fall 2011. This is due to extensive recruiting of the staff and current students during the fall semester.
39. The School Leadership Team has developed the CEP, and neither the former principal nor the current interim acting principal have ever developed or written the CEP.
40. Robeson received the same professional development as other schools. The DOE has not given intensive support to the school, as they claim.
41. The DOE has never given Robeson support in securing and/or implementing public or private grants.
42. Robeson is not a campus school, and therefore the DOE did not help us manage relationships with other schools.
43. The DOE has not assisted Robeson in creating partnerships. Robeson has formed productive relationship with many organizations, without assistance from the DOE.
44. There are some typos in the EIS.
45. At the November 9, 2010 meeting there were no negative comments made against the school. No parents mentioned concerns over the lack of challenge or high standards.
46. The DOE should have let the excessed teachers stay at the school (those who did not acquire jobs at other schools) and supplied the extra support services as promised in the Educational Pact drawn up by the DOE and the UFT at the end of last year.
47. We wonder why we aren't given the chance for an "improvement scenario" like Boys and Girls, John Dewey, Sheepshead Bay, and Maxwell, four Brooklyn High Schools with

similar demographics as Robeson. In addition, a chart was included in the response that compared performance indicators at these four schools to the performance at Robeson.

48. The current interim acting Principal was selected by CFN 305 without consulting school leadership. She is not experienced and has no vision for the school. The School Leadership Team has requested that she be removed. We have not heard anything from Mr. Conyers, CEO of Cluster 3 in regards to mentoring the principal. We request to be involved in the process of selecting the next leader of Robeson.
49. The DOE platitudes concerning garnering public opinion are patronizing. In a document leaked to the New York Times on January 14, 2011, the DOE moves ahead with its so called “proposed phase out” as if it were already a fact.
50. None of the plans laid out in the Educational Plan by the DOE and UFT have been carried through to fruition.
51. 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.

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

1. New York State Assemblywoman Annette Robinson stated:
 - a. She represents Boys and Girls High School and believes that the DOE and the school do not agree on certain issues. She did not vote for mayoral control of schools.
2. A commenter stated that:
 - a. Education and slavery are incompatible. Incarceration is a form of slavery and mayoral control is a form of colonization.
 - b. The DOE is abusing people by opening charter schools and restructuring neighborhoods.
 - c. The New York City school system has the 23rd largest budget in the world, but the leadership wants more money. The chancellor doesn’t have a doctorate in education, has not taught, and has sent her children to private school. This is privatization.
3. A commenter stated that the City is closing schools in poor and minority neighborhoods. She stated that the minority communities are united in a class struggle against privatization.
4. A commenter stated that New York City is not providing services for students with special needs and should be investigated.

5. A commenter stated that the goal of the public education system is to prepare students for prison.
6. Multiple commenters encouraged participants to attend a rally opposing the phase out proposals on January 27.

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

- Comments 1(a), 2(a), 3(f), 3(i), 3 (j) 3(k) 4(a), 4(b), 8, 10, and 30 note that the school should not be closed because gains have been made by the school in the past year. The DOE notes that a lengthy discussion of the rationale behind closing Robeson is included in the EIS. As stated in the EIS, schools may be eligible for phase-out for three reasons: (1) they received poor grades on their annual Progress Report; (2) they received a poor score on their annual Quality Review; or (3) they have been identified by the New York State Education Department (“SED”) as Persistently Low Achieving (“PLA”). In particular, the following factors account for why Robeson is being proposed to phase out this year:

Although, Robeson’s four year graduation rate increased from 40% to 50% between the 2008-2009 and 2009-2010 school year, the school’s graduation rate has been below 60% each year for the past decade. Robeson’s most recent 4-year graduation rate of 50% is still well below the citywide average of 63% for the class of 2009.

- Robeson received an overall C grade on its 2009-2010 Progress Report, with a C grade on the Student Performance sub-section, a B grade on Student Progress, and a D grade for School Environment. For each of the past four years, Robeson has received an overall grade of C on its Progress Report. This represents a continuing pattern of low performance for the school, which has earned an overall C grade on its Progress Report for the past four years.
- If Regents diplomas alone counted toward graduation – as will be the case in just one year – the four-year graduation rate at Robeson would drop to just 24%, well below the citywide Regents’ graduation rate of 46%
- In 2009-2010, only 66% of first-year students at Robeson earned at least 10 credits. Furthermore, Robeson students tend to fall further behind as they advance in grade level, as only 57% of second year and third-year students earned at least 10 credits in 2009-2010. Credit accumulation is a key predictor of future student success because students who fall behind often have trouble getting back on track to graduation.
- Attendance at Robeson High is well below the citywide average of 86% for high schools. The 2009- 2010 attendance rate at Robeson was 76%, 10 points lower than the city average. In fact, this attendance rate puts Robeson in the bottom 5% of all City high schools, and in the lowest 7% of high schools in Brooklyn. The

DOE is proposing that Robeson be phased out because it is the right thing to do for our students.

- In addition, in January 2010 the State identified Robeson as a PLA school.
- Comments 1(b), 3(g), 6(f), 6(g), 9(b), and 49 discuss the replacement options for Robeson. On January 15, 2011, the DOE released an Educational Impact Statement that proposes to re-locate the Academy for Health Careers to building K625 beginning in September 2011. In addition, the DOE has proposed to open a new school, 17K122, which will serve students in grade 9 in 2011-2012 in the K625 building. Neither of these schools is a charter school, and both will admit students through the High School Admissions Process through the Limited Unscreened admissions method. More details regarding these schools can be found in the Educational Impact Statement for this proposal. There will be a joint public hearing regarding the co-location proposal in February 2011, and it is anticipated that this proposal will be voted on by the Panel for Educational Policy at the March 1, 2011 meeting. The DOE does not anticipate that this phase out proposal will reduce the number of high school seats in Brooklyn. Besides Robeson, the DOE is also proposing to phase out another high school in Brooklyn, Metropolitan Corporate Academy. However, the proposal to site a new school, 17K122, will provide more 9th grade seats than Robeson did this year. There are also several other high schools in Brooklyn that are phasing in. In Brooklyn, there are 91,483 high school seats and 80,070 students enrolled in those high school seats. Thus, the borough has more than enough capacity to serve more students in its schools.
- Comment 1(c) notes that since the school has been proposed for phase out, students have become less motivated to come to school and funders have withdrawn support from the school. Although the 2010-2011 data regarding student attendance is not yet available, the DOE notes that in 2009-2010 student attendance actually increased from 69% to 76%. Additionally, the DOE is unaware of any funding that has been withdrawn from the school, although CitiCorp may have plans to discontinue their mentoring program with the school.
- Comments 2(b), 3(c), 6(b), 7(e), 12, 16, 31, 36, 40, and 43 note that the DOE has not provided necessary support to Robeson. In fact, the DOE has offered the following supports to Robeson:

Leadership Support:

- Helping the principal develop Robeson's Comprehensive Education Plan and set school goals.
- Connecting administrators with other schools to learn effective practices that could be replicated at Robeson.

Instructional Support:

- Training for assistant principals on conducting observations, reviewing student work, and accountability tools.

- Training for school leadership on implementing instructional rounds and learning walks to help teachers learn from each other.
- Working with the school to align curriculum across grade levels and subject areas.
- Helping the school implement Virtual Enterprise CTE programs.
- Helping the school to use data to improve instruction for English language learners, students with disabilities, and students performing below grade level.

Operational Support:

- Coaching staff on budgeting, human resources, recruiting and retaining talented teachers, and compliance issues.
- Helping the school secure and implement public and private grants, which were used for mentoring, credit recovery, student attendance, and peer mediation.

Student Support:

- Training guidance counselors on how to use scholarship reports and graduation tracking systems.
- Working with Robeson to improve student attendance and reduce suspensions through creating partnerships with Global Kids and Crown Heights Mediation.
- Despite these efforts, student outcomes have not significantly improved, suggesting that the school lacks the capacity to quickly turn around to better serve students.

The DOE works with the school to provide support in implementing these training and coaching sessions. Additionally, while there had been turnover in the Brooklyn High School Superintendent position over the last few years, the DOE works to ensure transition and continuity in support provided to the school.

- Comments 3(b), 3(d), 9(c), note that Robeson is one of the few large remaining high schools in Brooklyn because certain other large high schools have been closed. The DOE notes that there are currently 23 high schools in Brooklyn that serve more than 800 students. Therefore, there continue to be numerous options in Brooklyn for students who desire a large high school setting. In addition, the phase-out of other schools in Brooklyn has been accompanied by the creation of new high schools. In Brooklyn, there are 91,483 high school seats and 80,070 students enrolled in high schools. Thus, the borough has the capacity to serve more students in its schools than are currently attending high school in Brooklyn.

Moreover, contrary to the suggestion that Robeson was serving a larger number of English Language Learner (“ELL”) students or over-age students or students with disabilities than its peers, according to the 2009-2010 Progress Report, Robeson only served 4% of students who are English Language Learners, compared to an 11% borough average. At Robeson, 5% of students were served in Self Contained settings for students with disabilities, compared with a 4% borough average. The DOE recognizes that the percent of students attending Robeson with an Individual Education Plan (“IEP”) is higher than the borough average. Although the percentage of students who are over-age at Robeson is larger than the borough average, 13% of students at Robeson are over-age

and undercredited, compared with a 6% borough average, this percentage includes students who become overage at the school.

- Comments 3(e) , 4 (b) and 6(c) note that the school should not be closed because it is making progress, and comments 7(c), 11 and 33 suggest that Robeson’s high needs population drives lower performance. The DOE acknowledges that graduation rates at the school have improved from 2008-2009 to 2009-2010, but the overall graduation rate at Robeson has been historically low and below 60% for the last 10 years. Like most New York City public schools, Robeson serves a high-need population: 21% of students require special education services and 4% are English language learners. As discussed earlier, Robeson’s graduation rate in 2009-2010 was 50%. But, other schools serving similar students have achieved far better results.
 - At the Cobble Hill School of American Studies, a Brooklyn school, 21% of students require special education services and 5% of students are English language learners. That school achieved a 64% four-year graduation rate in 2009-2010, with 35% of students earning Regents diplomas.
 - At Harry Truman High School, a Bronx school, 25% of students require special education services and 9% of students are English language learners. That school achieved a 64% four-year graduation rate in 2009-2010, with 55% of students earning Regents diplomas.
 - 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 Robeson.
- Comments 3(h) 4(b), 7(b), and 15(a)-(f) note that Robeson has successful educational programs. The DOE acknowledges that Robeson has many successful partnerships and existing educational programs. Despite these programs and partnerships, the school has continued to fail to meet the needs of its students. These partnerships and educational programs would continue to be offered as the school phases-out and as students are supported in graduating from Robeson. In the future, the DOE anticipates that the new schools phasing into the building would offer similar or comparable programs to those offered at Robeson.

In regards to Career and Technical Education (“CTE”) programs, students currently participating in a CTE program would continue to have access to necessary classes to support them as they work to meet graduation requirements and earn their high school diplomas. Despite the commenter’s statement that these CTE programs are not offered elsewhere in Brooklyn, there are 9 other CTE programs in the Business Finance pathway citywide, including 4 in Brooklyn. There are 9 other CTE programs in the Information Support Services pathway citywide, including 3 in Brooklyn. There are 22 other CTE programs in the Visual Arts pathway, including 5 in Brooklyn. Finally, there are 38 other CTE programs in the Management pathway citywide, including 10 in Brooklyn. A complete list of the schools in the City that provide the same CTE pathways as Robeson can be found in Appendix B of the Educational Impact Statement.

- Comments 4 (c) and 14 discussed a NYTIMES article about the replacement school options for Robeson. As stated above, the DOE issued an EIS on January 15, 2010 which

proposed to site two new schools in the Robeson building. One of these schools would be an existing DOE high school, the Academy for Health Careers and the other would be a new DOE high school 17K122. The PEP has not yet voted on the proposal to phase-out Robeson. If the PEP does not approve the proposal to phase-out Robeson, the DOE would re-examine its proposal to co-locate Academy for Health Careers and 17K122.

- Comment 17 alleges that there was lack of leadership at the school. The DOE acknowledges that the former Principal of Robeson, Ira Weston, was removed in February 2010. Assistant Principal, Simon Grey, assumed those duties until Katherine Kefales was appointed as Interim Acting Principal in July 2010.
- Comments 7(d), 18, and 38 discuss the fact that demand for the school was not low in prior years. The DOE notes that demand for the school has been consistently low for the past three years. The citywide average for the number of applications per seat is 8.1, but, as demonstrated in the table below the number of applications per seat has fallen at Robeson across all academies and is well below the citywide average. The number of applicants per available seat for September 2010 reflect applications received prior to the proposal to phase-out Robeson was announced in December 2009.

Academies within Paul Robeson High School	Number of applicants per available seat		
	Sept 2008	Sept 2009	Sept 2010 ⁷
Academy of Finance	4.2	4.9	3.2
Academy of Information Technology	3.9	2.6	1.9
Entrepreneurship	4.3	4.2	2.5
New Media Technology	3.7	3.4	2.5

- Comment 19 notes that the DOE is phasing out large schools and replacing them with smaller schools to create more jobs for principals. In New York City, we are striving to create a system of great schools. To accomplish this goal, we've replaced 91 of our lowest-performing schools with better options and opened 474 new schools. Of the 474, 365 are traditional public schools and 109 are public charter schools. As a result, we've created more good choices for families. The DOE does not base the decision to open new schools on whether it will create more jobs for principals in the future.
- Comment 13 notes that Robeson graduates more minority students than other high school school. The Progress Report does not disaggregate graduation rate by ethnicity, however, the school's graduation rate has been below 60% each year for the past decade, and was 50% in 2009-2010. Robeson's most recent 4-year graduation rate of 50% is well below the citywide 63% average for the class of 2009. Robeson's four year graduation rate did increase from 40% to 50% between 2008-2009 and 2009-2010, however the most recent

graduation rate still places Robeson in the bottom 10% of all high schools citywide and in Brooklyn. Moreover, in 2008-2009, 51% of African American males graduated Citywide, 50% of Hispanic/Latino males graduated Citywide, so at best Robeson is on par with the number of Black and Latino males graduating Citywide.

- Comments 6(e), 9(a), 25 and 45 contend that the community does not have a voice in responding to this proposal. To the contrary, the DOE has solicited feedback from students and community members in order to make informed decisions around phasing out a school. The DOE has held joint public hearings at the school, created a dedicated email, and provided a phone number for public comments. These comments are compiled and included in an analysis of public feedback, which is presented to the PEP for consideration prior to its vote on the proposal.
- Comments 9(b) and 9(c) question where students with disabilities and English Language Learners will go if this proposal is approved. As discussed, under this proposal, all current Robeson students would have the opportunity to graduate from the school assuming they continue to earn credits on schedule. Robeson currently offers Collaborative Team Teaching, Self Contained and Special Education Teacher Support Services. It also has English as a Second Language program. English Language Learners at Robeson will continue to receive mandated services even as the school phases out. Students with disabilities will likewise to continue to receive mandated services in accordance with their Individualized Education Plans (“IEPs”). In addition, non-District 75 high school students with IEPs and ELLs are placed in the school they would attend as if they were not disabled or ELLs. Schools are expected to create programs that meet the needs of all students ensuring the greater exposure to a general education curriculum.

There are seats in Brooklyn to accommodate the students who would have otherwise attended Robeson. In Brooklyn, there are 91,483 high school seats, but only 80,070 students are enrolled in those seats. This year, the DOE is also proposing to open several new schools that will replace seats lost as a result of schools phasing out as well as increase the number of quality options available to students and families. 32K168 will open on the Bushwick Educational Complex to replace approximately 400-450 seats lost as a result of the re-location of the Harbor School. Millennium Brooklyn (15K684) has been proposed to open on the John Jay Campus in building K460, and will enroll approximately 400-450 students in grades 9-12 when it completes its phase-in by 2014-2015. In building K625, where Paul Robeson High School is currently located, the DOE is proposing to phase in 17K122 which will serve approximately 400-450 students in grades 9-12 when it reaches full scale by 2014-2015.

Information regarding the new schools that will be proposed to open in 2011 will be provided in the winter for students who may be interested in applying to the schools as part of the High Schools Admissions Process. The details of this process are discussed the Educational Impact Statement. Detailed information about all City high schools and program offerings is published annually in the City’s High School Directory, available in print at DOE middle schools and Borough Enrollment Offices or on the DOE website here: <http://schools.nyc.gov/ChoicesEnrollment/High/Directory/default.htm>.

- Comment 23 notes that safety has not been an issue at the school. The DOE notes that on the 2009-2010 New York City School Survey, 22% of students reported feeling unsafe in the hallways, bathrooms, and locker rooms. That same year, 22% of parents expressed concerns about their children’s safety. In addition, 42% of teachers reported that discipline and order were not maintained at the school. While there are certainly other schools across the city that struggle with safety issues, we cannot ignore what is happening at this school.
- With regard to comments 3(a), 6(a), 20 and 26 concern Paul Robeson’s long standing history in the community, the DOE acknowledges this long history, but notes that the school has struggled for years to provide a high quality education to its students. The DOE has offered considerable support to the school, but despite these efforts, Robeson’s performance continues to be inadequate. As a result, there is a great need to provide better options for students and their families. Under this proposal, Robeson will eventually close, but students in the community will continue to be served by new educational options that better support their learning needs.
- With regard to comment 22, we acknowledge the hard work and dedication of the teaching staff. However, given Paul Robeson High School’s lack of success despite the supports offered – whether as part of a centralized effort to support all schools or individualized plans for Paul Robeson – it is apparent that the school has failed to develop the proper infrastructure to meet the needs of its students and families. In order to improve the educational outcomes for current and future students, the DOE is proposing to recover the seats lost through the phase-out of Robeson High School by adding a new school in the K625 building. 17K122 would offer a rigorous, college-preparatory program designed to equip students with the skills necessary to achieve post-secondary success. The DOE believes that co-locating a new high school in the K625 building would create a much needed high-quality educational option in the community.
- In response to comment 24, the DOE has been transparent in its plan to phase out Paul Robeson and replace the seats lost through the phase in of a new school, 17K122. All school supervisor and/or administrator positions assigned to Robeson will eventually be excessed when the school is closed. Some positions will likely be excessed as the school gradually phases out, as administrative needs will decrease as the school serves an increasingly smaller student population. Again, all excessing will take place in accordance with existing labor contracts. 17K122 is expected to hire school supervisors and/or administrator personnel as needed throughout the course of the schools’ phase-in.
- In response to comments 21 and 28, which raise a concern around how students will be supported and guaranteed a quality education as the school phases out, during the proposed phase out, the DOE will build on our past efforts to help the school by:
 - Providing teacher training around issues including curriculum planning, improving teaching practices, and tailoring instruction to individual student needs.

- Fostering opportunities for teachers and administrators to connect with colleagues in other more successful schools, allowing them to learn from one another, improve teaching, and better support students.
- Facilitating partnerships with community-based organizations to support youth development initiatives at the school.
- All current students at Robeson may remain enrolled in the Robeson assuming they continue to earn credits on schedule. All students are encouraged to meet with a guidance counselor to discuss progress towards graduation, particularly students who are at risk of not meeting promotional requirements by June 2014. Depending on their age, academic profile, and credit accumulation, some students may be better served in one of the City's Transfer Schools or Young Adult Borough Centers,¹ which have strong track records for helping over-age, under-credited students get back on track toward graduation. In general, however, it is expected that most current Robeson students would remain enrolled at the school as they work toward graduation.

As we work together to create better options for the Robeson community, we will keep in mind what has worked at Robeson and do our best to incorporate those positive elements into replacement plans. For example:

- We will work with the community to retain partnerships with community-based organizations that are offering valuable services to the school community; and
 - We will consider what elements of the school structure are working and do our best to include those features in a replacement school, if Robeson is phased out.
- In regards to comment 29, over-the-counter placement is a term that refers to the method of enrolling students who need a school assignment because they were not part of any admissions process for entry grades and/or were not enrolled in a New York City school at the time school started. These students fall into one of four categories:
 - New to the New York City school system; or
 - Left the New York City school system and have returned; or
 - Are seeking transfers (based on the guidelines outlined in Chancellor's Regulation A-101).²
 - Did not participate in the high school admissions process

When a student arrives for an over-the-counter placement, his/her school assignment is determined by his/her interest, home address and which schools have available seats, and where applicable, transfer guidelines. The student visits a Borough Enrollment Office where he/she meets with a counselor who reviews options that will meet the student's needs.

¹ Young Adult Borough Centers are evening academic programs designed to meet the needs of high school students who might be considering dropping out because they are behind or because they have adult responsibilities that make attending school in the daytime difficult. Students graduate with a diploma from their home school after they have earned all of their credits and passed all of the required exams while attending the YABC.

² Per Chancellor's Regulation A-101, students have the "right to return" to their prior school following discharge within one calendar year of discharge, subject to available seats. Therefore, it is possible that non-zoned students arriving for an OTC placement may be granted admission to a zoned school.

- In regards to comment 32, the reference to 2010-2011 performance in the EIS was a typographical error. The EIS was in fact referring to the most recent year of performance data in 2009-2010. As stated on page 2 of the EIS, “Last winter, the Panel for Educational Policy voted to gradually phase out Robeson based on evidence that the school was not equipped to significantly improve student performance. A lawsuit prevented the DOE from following through with those plans. Robeson’s performance during the 2010-2011 school year has continued to decline, confirming the DOE’s earlier assessment that the school lacks the capacity to turnaround quickly to better support student needs.” After the lawsuit prevented the DOE from following through with the proposal to phase out Robeson, the performance at Robeson in 2009-2010 continued to decline.
- Comments 42 and 44 also highlight a few additional typographical errors. These typographical errors are not material in substance and do not change the proposal.
- Comment 35 concerns the accuracy of Robeson’s attendance rate as reported in the EIS. Attendance and register data in the EIS and in the Progress Report reflect what has been reported via the Period Attendance Reporting (PAR) process. The PAR can be found on the DOE website at the following website:
<http://schools.nyc.gov/AboutUs/data/stats/attendance/PARbydistricts/default.htm>
 The attendance rates at Robeson for 2009-2010 are as follows, for an average of 76%, which ranks the school in the bottom 5% of schools citywide.

<u>Sep-10</u>	<u>Oct-10</u>	<u>Nov-10</u>	<u>Dec-10</u>	<u>Jan-10</u>	<u>Feb-10</u>	<u>Mar-10</u>	<u>Apr-10</u>	<u>May-10</u>	<u>Jun-10</u>	<u>Avg.</u>
83.32%	81.42%	79.90%	75.38%	70.34%	69.13%	76.56%	74.67%	74.70%	66.02%	75.91%

- Comment 37 concerns the accuracy of the teacher satisfaction data noted in the EIS. The data in the EIS is correct. According to the 2009-2010 Learning Environment Survey, 42% of teachers reported that order was not maintained in the school. The comment states that 59% of teachers felt that discipline was maintained in the school. These numbers are both correct. This total equals 101% due to the rounding of percentages. This is not an instance of a number that has been included incorrectly.
- Comment 41 suggests that the DOE has not supported the school in acquiring grants. In fact the commenter’s report itself offers evidence that the DOE did assist the school in acquiring grants, because the commenter notes that “the AP of Guidance and the AP of English, with some support from the network, wrote an attendance incentive grant which brought in Global Kids as the CBO to assist with our attendance issues over the next two years.” Thus, the Network did provide support to the school in acquiring at least one grant.

Additionally, in June 2010, CFN 305 met with the AP of Guidance, AP of ELA, and SLT Chair at Paul Robeson to discuss strategies to secure CBO partnerships for the calendar year 2010-2011. This meeting was held after 6/1/11, the day at which all CFN support was effectuated by the DOE. Paul Robeson did not have the funds to support comprehensive CBO partnerships. CFN 305 collaborated with the school to secure a partnership for the United Way AIDP (attendance improvement/drop-out

prevention) grant for \$250,000. In June, CFN 305 submitted draft notes to complete the United Way application. Paul Robeson's application was approved by United Way for \$250,000 grant for two years. Three CBOs were identified to be interviewed by the school: Global Kids, currently working with the school, would not have funding for 2010-2011 and was considered as one of the three organizations. The AIDP program is comprehensive, including counseling services to address the various social and emotional issues that serve to affect academic performance and the personal development of students. CFN 305 supports this CBO partnership and it is discussed during meetings regarding attendance support.

- Comment 5, 6(d), 7(a), 27, 34 and 47 ask why the DOE is not implementing a different intervention strategy. The commenter lists 4 schools with comparable demographics which are not being proposed for phase-out: Boys and Girls, John Dewey, Sheepshead Bay, and Maxwell. As stated previously, the DOE considers a variety of factors in assessing the performance of a school. As stated in the EIS, schools may be eligible for phase-out for three reasons: (1) they received poor grades on their annual Progress Report; (2) they received a poor score on their annual Quality Review; or (3) they have been identified by the New York State Education Department ("SED") as Persistently Low Achieving ("PLA").

Elementary and middle schools that score higher than their district average in English Language Arts and math, high schools with graduation rates higher than the citywide average, schools earning a Well Developed or Outstanding score on the Quality Review, or schools receiving a Progress Report for the first time are eliminated from the slate and not considered for significant changes. For this smaller set of schools, we undertake in-depth conversations with school communities and networks to get a granular sense of what is happening at this school, and whether more significant action is needed. We continue to consider performance data, school culture, and demand information. We also do engagement with these schools' leadership, parents, and community leaders to hear their opinions on why the school is struggling and what can be done to address its weaknesses. This year, for example, we held meetings at 55 schools and incorporated feedback from these meetings into the investigation process. For the majority of schools we investigate, we see hope that the school can turnaround, and so we may replace the principal, change staff, invest in new programs or mentor teachers, and sometimes reconfigure grades to help the school change trajectory. But, in some cases, we are left with a set of schools that we believe – based on quantitative and qualitative data – do not have the ability to improve quickly; and a decision is made to propose to gradually phase out the school and give future students a better opportunity. It should be noted that no single factor determines whether a school will phase out or not. Deciding to phase out a school is the toughest decision we make. But it is the right thing to do for the students of New York City.

The DOE welcomes feedback from all school and community stakeholders. However, based on an extensive review of data and community feedback, the DOE has determined that Robeson is unable to turn around and cannot provide a high-quality education to its students

As discussed above, Robeson was initially considered for phase-out given the poor grades it received on its annual Progress Reports, as well as being identified by the State as a PLA school. After a comprehensive assessment described above, it was the belief of the DOE that the school did not have sufficient capacity to turnaround quickly to best meet the needs of students. The four other schools identified above by the commenter are also PLA schools. There are some critical differences between Robeson and the schools identified by the commenter:

1. Sheepshead Bay does not meet the other accountability criteria for a phase out in regards to its Progress Report or Quality Review scores. In addition, its 2009-2010 graduation rate was 63%, which is equal to the citywide average.
2. John Dewey High School also had a graduation rate of 63% in 2009-2010.
3. Boys And Girls High School received a B on the 2007-2008 Progress Report, and did not meet the Progress Report criteria.
4. Finally, Maxwell High School earned a B on the 2009-2010 Progress Report.

Again, the DOE uses a variety of criteria to assess the appropriate intervention for struggling schools. As these 4 other schools were all identified by the State as PLA, the intervention at these schools is still being assessed by the DOE.

- Comment 39 indicates that the Principal did not participate in the Comprehensive Education Plan (“CEP”). However Children’s First Network 305 indicates that that the Principal did collaborate in outlining goals for the CEP which was shared with the Network and School Leadership Team.
- Comment 46 refers to Absent Teacher Reserve pool of teachers working at the school. All excessing of teachers is done in accordance with the collective bargaining agreement between the UFT and the DOE.
- Comment 50 states that the Educational Plan as outlined by the DOE and the UFT has not been implemented. These comments also indicate that the CFN and the DOE have not provided intensive supports to the school. In fact, the DOE has worked with the school to address needs.
 - As requested, Robeson received 8 teachers from the ATR pool. The Network Leader was informed by the school that there was no need for additional ATRs.
 - In regards to CBO support, Robeson indicated that they were not looking for new additional CBO partnerships. The Acting Principal and the SLT are evaluating existing current CBO affiliations.
 - The curriculum audit is underway.
 - In regards to instructional support for special needs and English language learner students, the network is providing further professional development to meet those needs.
 - In regards to the questions regarding the Interim Acting Principal, see the response below to comment 48.

- Comment 48 questions the placement of the Interim Acting Principal. The current Interim Acting Principal has years of supervisory experience. She is an appointed Principal and a tenured assistant principal of mathematics and a graduate of the Leadership Academy. The decision to place her at Robeson was made according to procedures governing the placement of Interim Acting Principal.
- With respect to comment 51, 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.