



Public Comment Analysis

Date: February 2, 2011
Topic: The Proposed Phase-out of John F. Kennedy High School (10X475)
Date of Panel Vote: February 3, 2011

Summary of Proposal

John F. Kennedy High School (10X475, “Kennedy”) is an existing high school located at 99 Terrace View Avenue, Bronx, NY 10463, within the geographical confines of Community School District 10. It currently serves students in grades nine through twelve. The New York City Department of Education (DOE) is proposing to phase out and eventually close Kennedy 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. The Educational Impact Statement (“EIS”) describing this proposal was published on December 12, 2010 and amended on January 27, 2011. The EIS describing this proposal can be accessed in the main office of Kennedy on the DOE’s website at <http://schools.nyc.gov/community/planning/changes/bronx/Kennedy>.

If approved, Kennedy 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 at Kennedy. 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 education after Kennedy completes its phase-out.

Kennedy is located in building X475 and is currently co-located with five other district high schools: Bronx Engineering and Technology Academy (10X213, “BETA”), Bronx School for Law and Finance (10X284), E.L.L.I.S Preparatory Academy (10X397, “E.L.L.I.S.”), Marble Hill High School for International Studies (10X477), and Bronx Theatre High School (10X546). E.L.L.I.S is relatively new and is still “phasing in” to the building, gradually growing to “full scale” as it adds a new grade of students annually. The other schools in the building have already reached full-scale and currently enroll students in grades 9-12. Building X475 also houses a part-time, evening GED Plus Learning to Work Program. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias.

In 2009-2010, Building X475 had a target capacity of 3,992 students and enrolled 3,111 students, yielding a building utilization rate of 78%. In 2010-2011, the six schools within the building are projected to serve a total of 3,084 students, which would yield a target building utilization rate of

77%. This means that the building is “underutilized” and has extra space to accommodate additional students.

If this proposal is approved, the existing schools located in X475 would continue to serve their current students and E.L.L.I.S. would continue to phase-in as planned. In a separate Educational Impact Statement (“EIS”), which was posted on January 15, 2011, the DOE proposed to co-locate two new high schools, New Visions Charter High School for the Humanities and the New Visions Charter High School for Advanced Math, in building X475 as replacement options for Kennedy. Those schools would begin phasing into the X475 campus, starting with ninth grade during the 2011-2012 school year, and would continue growing to full-scale as Kennedy phases out. Both new schools would complete their expansions during the 2014-2015 school year, at which point they would serve students in grades 9-12.

Summary of Comments Received Prior to the Official Public Comment Period

Certain comments were received during meetings with parents and community members prior to the comment period on this proposal. Although these comments were not received during the comment period, as a courtesy, the DOE wishes to acknowledge that two written comments and one oral comment by telephone was received. Among the comments was an expression of support for the phase-out due to community safety concerns, concern about the fate of special education students and the leadership of New York City schools, and support for the school from an alumnus. Comments similar to these are addressed in the analysis of issues raised, specifically responses to comments 1(b), 13(b), and 30.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at John F. Kennedy High School on January 28, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 90 members of the public attended the hearing, 36 people spoke, and seven questions were submitted. Present at the meeting were Deputy Chancellor Marc Sternberg; Bronx High School Superintendent Elena Papaliberios; District 10 Superintendent Sonia Menendez; Kennedy Principal Lisa Luft; Bronx School of Law and Finance Principal Evan Schwartz and School Leadership Team (“SLT”) representatives Rosa Arroyo, Tyrone Iton, and Zoraida Torres; Bronx Theatre High School SLT representative Chris Lewis; E.L.L.I.S. Preparatory Academy School Leadership Team representative Renée Ehle; BETA Principal Rashid F. Davis; District 10 Community Education Council (“CEC 10”) President Marvin Shelton and CEC 10 member Valerie Greaves; Citywide Council on High Schools (“CCHS”) Bronx representative Denise Sullivan; and Facilitator Melissa Harris. Remarks were also made by State Senator Adriano Espaillat, State Senator Gustavo Rivera, City Council Member Oliver Koppell, City Council Member Ydanis Rodriguez, as well as City Council Member and Education Committee Chair Robert Jackson.

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

1. Senator Adriano Espaillat of the 31st senatorial district for New York State commented:
 - a. The priority is to improve the quality of education for students. If alternative options to Kennedy can provide education, Kennedy can be closed.

- b. However, we need to limit disruption to students and ensure viable placement for Over the Counter students including English Language Learners and Special Education students.
 - c. The DOE needs to give information to parents in a timely manner. The DOE took a long time to respond to requests for community meetings. The DOE should improve its communication with families.
- 2. Senator Gustavo Rivera of the 33rd senatorial district of New York State commented:
 - a. There has been insufficient dialogue with parents whose students who attend JFK. Parents need to have a voice in the decision making process.
 - b. If the DOE phases out Kennedy, the incoming school needs to be higher quality than Kennedy. The transition must be smooth. The needs of English Language Learners must be attended to. The new school must meet or exceed the resources that Kennedy offered to students.
- 3. City Councilman Oliver Koppell commented:
 - a. The timing of this hearing is inconvenient. Friday night is not a good time for people who go away on weekends or have other responsibilities.
 - b. There is misconception in the community about the phase out. People think that the building will be closed down.
 - c. The school is not working well. But if the school is phased out, current students need full attention and support.
 - d. The DOE should have a community meeting to discuss what schools should replace Kennedy.
 - e. The DOE seems to have decided that Kennedy should be replaced by two charter schools. However, the student body is largely comprised of English Language Learners and Special Education students who will not be served by those charter schools. This will have an impact on other schools in the Bronx. These students are going to go to Clinton High School, which is already serving many struggling students. Clinton High School will be overwhelmed. E.L.L.I.S. is already overflowing; the DOE should give more seats to E.L.L.I.S..
- 4. City Council Member Ydanis Rodriguez commented:
 - a. The DOE needs to listen to families and communities. Elected officials met with the DOE and developed a plan to meet with the community regarding the phase out and replacement options for Kennedy. Before the meeting took place, someone leaked a document to the New York Times that indicated that the DOE was looking at bringing a charter school in to replace Kennedy. The decision has already been made and this is wrong; the DOE needs to listen to students, parents, and elected officials.
 - b. Charter schools can be a model, but not the only model. Privatization is not the answer.
- 5. City Council Member Robert Jackson, Chair of the Education Committee, stated:
 - a. I believe the phase out decision is not final. If it is, this is a charade and decision-makers are acting in bad faith.

- b. Kennedy has been overcrowded for many years. This has had negative effects on students. Students in overcrowded buildings get into more fights. This drives down demand.
 - c. Parents need to be engaged and the DOE needs to listen to their feedback.
 - d. The DOE held a meeting with elected officials in December regarding the school. At that point, DOE officials said they didn't know what the replacement plan for Kennedy would be. Then, the New York Times leaked a document indicating that the DOE planned to replace Kennedy with a charter school. There needs to be greater transparency.
6. Denise Sullivan, Bronx representative to the CCHS, stated:
- a. This school is struggling because it needs more resources, including professional development for teachers.
7. A commenter stated:
- a. Kennedy is struggling with financial issues. As Title I chairperson, I tried to fix the budget. We do not have separate Title I funding. The principal stole \$91,000. This is the DOE's fault, not students' and parents' fault.
 - b. Parents were told in the past that the DOE would address the issues at Kennedy, but not enough has been done.
 - c. PTA meetings are not well-managed.
8. A commenter stated that parents today are not as involved as they should be. Parents should go to parent-teacher conferences. This leads to dysfunction in society, including violence, poverty, and teen pregnancy. The immigration rate is much higher. Closing Kennedy is not the answer to these problems.
9. A commenter stated that students at Kennedy face challenges such as language and poverty and require additional resources.
10. A commenter stated that when small schools came into the Kennedy building it hurt the school.
11. A commenter stated that large neighborhood high schools can prepare students for life. Kennedy can do that, but it has been reduced; it only has one foreign language now. Kennedy used to have a comprehensive and varied curriculum; now the school is training students for the Regents. The DOE should have opposed New York State Education Commissioner Knowles so that Kennedy could have returned to a more varied curriculum.
12. A commenter stated that Kennedy is not managed effectively.
13. Multiple commenters stated that the DOE should have repaired and resourced the school instead of watching it struggle. In particular:
- a. The school needs more science rooms.

- b. Dollars going to funding principals should support deans and resources for students.
 - c. Small charter schools do not have enough classrooms for teaching.
14. A commenter stated that the Mayor, the Chancellor, and the DOE need to be accountable for the failure of Kennedy. The principal was destructive to Kennedy and the DOE did not take action. The DOE overloads schools like Kennedy with at-risk students and does not provide sufficient resources. This is setting the schools up for failure. This is true of many of the schools now being proposed for closure.
15. Multiple commenters stated that the school is overcrowded and under-resourced. In particular:
- a. A commenter stated that she is a student at Kennedy and has not had access to a guidance counselor.
 - b. Students at Kennedy deal with crowded classrooms and safety agents instead of clean hallways and resources.
 - c. The school needs more textbooks so students can take them home to study.
 - d. Textbooks are outdated.
 - e. The school needs more funding.
 - f. There is no librarian.
16. Multiple commenters stated that the DOE should look at options other than closing Kennedy.
17. A commenter stated that charter school lotteries lead to fewer seats.
18. A commenter stated that the hearing was scheduled for Regents week so no one would be able to attend.
19. A commenter stated that charter schools have resources that Kennedy doesn't.
20. A commenter stated that Kennedy enrolls students who are pushed out of other schools.
21. A commenter asked why the DOE feels phasing out or relocating a school changes its education climate.
22. A commenter asked what the plan is to support current Kennedy students if the school is phased out.
23. A commenter asked what the DOE will do to deal with overcrowding if Kennedy is phased out.
24. A commenter asked what the difference is between public schools and charter schools.
25. A commenter asked what will happen to alumni records if Kennedy is phased out.

26. A commenter asked what the point of the hearing is if decisions about Kennedy have already been made.
27. A commenter asked why Educational Impact Statements regarding the proposed phase out and replacement of Kennedy were not released simultaneously.

The DOE received three comments at the Joint Public Hearing which did not directly relate to the proposal.

1. Joel Klein hurt education; the new chancellor will finish that job.
2. Education Reform Now come from Wall Street elite.
3. New York State gave Bloomberg mayoral control.

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

The DOE received five comments by e-mail and three comments by telephone.

28. CEC 10 President Marvin Shelton urged the PEP to vote no on phasing out Kennedy because the replacement plan of two new schools in the building will be difficult to manage, expensive and will reduce capacity to accommodate “over-the-counter” enrollment.
29. Multiple commenters asked whether the new schools and/or facility will be named after President John F. Kennedy.
30. BETA Principal Rashid F. Davis inquired about the calculation of the four-year Regents Diploma Rate cited in the EIS in comparison to data contained in the State report card.
31. A commenter felt that alumni emotions towards Kennedy would not weigh against the facts of the phase-out proposal and encouraged the Kennedy PTA to present facts to challenge the proposal.
32. 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 also received a comment which did not directly relate to the proposal.

1. An inquiry into how to offer an extracurricular tutoring program for interested Kennedy students.

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

- Comments 1(a,b) and 4(b) concern the quality of the replacement options for Kennedy. On January 15, 2011, the DOE proposed to co-locate two new high schools, New Visions Charter High School for the Humanities and the New Visions Charter High School for

Advanced Math, in building X475 as replacement options for Kennedy. Those schools would begin phasing into the X475 campus, starting with ninth grade during the 2011-2012 school year, and would continue growing to full-scale as Kennedy phases out. Both new schools would complete their expansions during the 2014-2015 school year, at which point they would serve students in grades 9-12. More details regarding these schools and its impact on students in building X475 can be found in the EIS for this proposal. The EIS is available online at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Mar12011Proposals.htm>.

These new schools would offer a rigorous academic program and prepare students for post-secondary work in the humanities, and math and science. The proposed new charter schools would be managed by New Visions for Public Schools (“New Visions”). Although these two charter schools are the first charter schools that New Visions has been approved to open, the organization has a strong track record of success. New Visions has opened many new small high schools in New York City, including four of the schools on the Kennedy High School Campus: BETA, Bronx School for Law and Finance, Marble Hill, and Bronx Theatre. BETA and Marble Hill earned A grades, BSLF earned a B grade, and Bronx Theatre earned a C grade on their respective 2009-2010 Progress Reports. The DOE believes that co-locating two new schools in the Kennedy High School Campus would create much needed additional high-quality educational options in the community.

- Comments 1(b), 3(c) and 22 concern the support that current Kennedy students will receive if the school is phased 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 teacher 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

As a school identified as PLA, Kennedy is eligible for School Improvement funds to support the Turnaround model. In most cases schools undergoing the Turnaround model must replace the principal and at least 50% of the staff. In New York State, the Turnaround model also allows for a school to be phased out and replaced by a new school over time. If Kennedy were selected by the State to implement a School Improvement Grant model (i.e., Transformation, Turnaround, or Restart), School Improvement funds for implementing its plan would be shared between Kennedy and the new proposed high schools to be co-located in X475, and will be available to support programs at both schools that will actively advance students towards graduation.

Under the proposal, all current Kennedy students would have the opportunity to graduate from Kennedy assuming that they continue to accumulate. Current first-time ninth-grade

students will also have the option to apply to a different school for tenth grade through the High School Admissions Process. Repeating ninth-grade students, as well as current tenth-, eleventh-, and twelfth-grade students would complete high school at Kennedy if they continue to earn credits on schedule. As the school becomes smaller, students would receive more individualized attention to ensure that they receive the support needed to succeed. Alternatively, students can also meet with their guidance counselor to review options such as transfer schools or Young Adult Borough Centers.

- Comments 1(b), 2(b), 9, 14, 20, and 28 discuss the large high-need population at Kennedy and call upon the DOE to ensure that these students and similar future students are supported. The DOE acknowledges that Kennedy currently serves a high need-population: 22% of students require special education services and 22% are English Language Learners (“ELLs”). A number of students also are admitted to the school “over-the-counter,” i.e., students who were not part of any admissions process for the entry grade and/or were not enrolled in a New York City school at the time school started. In 2010, the school’s four-year graduation rate (including August graduates) was 46%, well below the citywide 63% average.

At the same time, the DOE also has identified schools that serve similar students, which have achieved better results than Kennedy:

- At Harry Truman High School, a Bronx school, 25% of students require special education services and 9% of students are ELLs. That school achieved a 64% four-year graduation rate in 2009-2010, with 55% of students earning Regents diplomas
- At Port Richmond High School, a Staten Island school, 20% of students require special education services and 6% of students are ELLs. That school achieved a 65% four-year graduation rate in 2009-2010, with 48% of students earning Regents diplomas.

Students who would have been served by Kennedy would be served by other new and existing high schools in the City. High school admissions are based on a citywide choice process, with students ranking up to 12 high schools in order of preference during the “Main Round” of high school admissions. If this proposal is approved by the PEP, students who listed any of the program offerings at Kennedy on their high school admissions application would have the opportunity in February to submit a new application (New School Choice Form) with revised school rankings.

Students who may have attended Kennedy through “over-the-counter” admissions will continue to be served by one of the 481 schools that admit students over-the-counter during the peak enrollment period. Moreover, in the Bronx, the number of schools that admit over-the-counter students during this period has increased from 123 to 128.

While the DOE cannot predict the exact number of students who will apply to a particular high school through the High School Admissions Process or the number of students who will arrive over the counter, the DOE utilized historical data to predict the volume and demographic of students it will need to serve as a result of the proposed phase-out. It is

critical that the needs of all students – whether they arrive through the admissions process or over-the-counter (i.e.) – are met. Of the 210 ninth-grade students who were admitted to Kennedy through the High School Admissions process, 24% are students with disabilities and 21% are ELLs. And of the 140 students who arrived ‘over-the-counter’, 12% are students with disabilities and 18% are ELLs.

Additionally, the DOE is proposing to open 7 new high schools in the Bronx for the 2011-2012 school year. Each of these schools will admit students through the Limited Unscreened Admissions method through the High School Admissions process.

- Comment 3(e) expresses the concern that students will “overwhelm” other Bronx high schools as a result of Kennedy’s phase-out and recommends giving more seats to E.L.L.I.S.

This year, the DOE proposes to phase-out eight high schools in the Bronx, including Kennedy. If all eight of the proposals are approved by the PEP, the DOE has plans in place to replace lost seats in the Bronx. Based on the November 1, 2010 enrollment register, the eight schools that are proposed to phase-out are serving a total of 759 new ninth-grade students. However, these seats will be recovered through seats at new high schools. In fact, with the opening of new schools in the Bronx last year and the seven anticipated schools this year, the DOE will have created the capacity for approximately 990 ninth-grade seats for new students in the Bronx, which is more than enough to offset the 759 seats anticipated to be lost by the eight proposed phase-outs. Factoring in new ninth grade seats that were made available by expanding capacity in existing schools this year, there will be capacity for approximately 1,510 ninth-grade seats in 2011-2012.

In addition, the two new charter schools proposed to be co-located in X475 will offer 800-1,200 seats once they reach full scale, which will replace the approximate 1,100 seats that will be lost by Kennedy’s phase-out. In 2011-2012, the two new charter schools will provide priority to students who reside in District 10 in the Bronx, so they will serve students living in the community.

With regard to the request to increase the number of seats at E.L.L.I.S., this school is designed to serve students identified as having an Interrupted Formal Education (SIFE) and who are over-age. Students who enroll in this school do not participate in the standard High School Admissions Process. Going forward, the DOE will continue to assess the demand for high school seats at E.L.L.I.S. and schools that serve a similar population, and may consider increasing available seats if such a demand exists for the school and if there is appropriate space to accommodate such an expansion.

- Comments 5(b), 15(b), 23, and 28 contend that Kennedy is overcrowded and raise concerns that the building will be overcrowded in the future. In fact, building X475, has a target capacity of 3,992 students and enrolls approximately 3,084 students in 2010-2011, yielding a building utilization rate of 77%. This means the building is “underutilized” and has extra space to accommodate additional students. In fact, Kennedy is currently using 9 full size rooms in excess of its baseline room allocation as

set forth by the Citywide Instructional Footprint (the “Footprint”). During the course of its phase-out and the phase-in of the two new high schools, Kennedy will continue to be allocated its baseline allocation of rooms based on its enrollment, which will decrease each year.

For more information concerning the allocation of space in X475, please see pages 14-17 of the EIS describing the proposed phase-out of Kennedy. Please also refer to the EIS describing the proposal to co-locate two new schools in building X475 and the accompanying Building Utilization Plan (“BUP”).

Once two new high schools have completed their expansions and Kennedy has completed its phase-out in 2014-2015, there would be approximately 2,750-3,400 students served in the building, yielding an estimated building utilization rate of approximately 85%.

- Comments 11 and 21 question the benefit of phasing out a large school and ask how phasing out Kennedy will change the educational climate. The DOE strives to offer a system of great schools, with a variety of choices for students, including both large and small high schools. To help accomplish that goal, the DOE has replaced 91 of its lowest-performing schools with better options and opened 474 new schools. In addition, new schools that have phased in have made a difference in communities throughout the City.
 - For example, Evander Childs High School in the Bronx graduated only 30.7% of students in 2002, its final year before phasing out. The new students on the Evander Childs campus are getting tremendous results with the same student population, graduating 80.3% of students in 2009.

The DOE believes that replacing failing schools with new small schools is the most effective way to quickly turn around student achievement. In June 2010 MDRC, an independent research group, issued a report on NYC’s new small schools strategy. MDRC concluded that “it is possible, in a relatively short span of time to replace a large number of underperforming public high schools [and] in the process achieve significant gains in students’ academic achievement and attainment. And these gains are seen among a large and diverse group of students, including students who entered the ninth grade far below grade level and make students of color, for whom such gains have been stubbornly elusive.” For additional information on MDRC’s report, please refer to the following website <http://www.mdrc.org/publications/560/overview.html>.

- Comments 3(e), 4(b), 13(c), 17, 19, and 24 concern the structure of charter schools, the students they serve and the resources available to them. As discussed earlier, more details regarding the impact of the proposed new charter schools to be co-located in X475 are available in a separate EIS that was published on January 15, 2011. The DOE is currently seeking public comment regarding this proposal, and comments are welcomed by phone at 212-375-5159 and by e-mail at HS.Proposals@schoos.nyc.gov. There is a joint public hearing scheduled on February 15, 2011 regarding this proposal. Any comments received will therefore also be addressed in a future Analysis of Public Comment, to be published before the Panel for Educational Policy votes on the proposed

co-location on March 1, 2011.

Charter schools are public schools open to all residents of New York City. They are publicly funded in a manner similar to district schools, but may be operated by non-DOE organizations. Each school is governed by an independent board of directors. Under recent amendments to New York state law, for-profit entities may not operate new charter schools in the state.

Public charter schools are not able to select their own students, but rather must admit students through a lottery process. Lotteries select students randomly from among an applicant pool. Charters offer priority for students residing in the district in which the charter is located.

With regard to funding and other resources, charter schools receive public funding pursuant to a formula created by the state legislature, and overseen by the New York State Education Department. The DOE does not control this formula. Charter management organizations, just like any other school citywide, may also choose to raise additional funds to purchase various resources they feel would benefit their students (e.g., Smartboards, fieldtrips, etc).

With regard to space allocation, the Footprint is applied to both DOE and public charter schools to ensure equitable allocation of classroom, resource and administrative space.

Finally, under recent amendments to state law, public charter schools must 1) serve all students who are admitted through their lotteries, and 2) serve a percentage of students with disabilities and ELLs comparable to the district average. Charter schools that fail to meet the special education and/or ELL targets set by their authorizer risk being closed or having their renewal applications rejected.

- Comments 1(c), 2(a), 3(b,d), 4(a), 5(a,c,d), 26 and 27 concern the need for transparency and community dialogue on the part of the DOE, both during past conversations that led to the proposal to phase out Kennedy as well as ongoing discussions about the proposed replacements.

In response to concerns that the DOE did not seek or listen to community feedback in the time leading up to the proposal to phase out Kennedy, the DOE conducted an extensive analysis that included the solicitation and collection of community feedback regarding the school. On October 12, 2010, Bronx High School Superintendent Elena Papaliberios held meetings with the School Leadership Team and parents at the school to discuss what is and is not working at Kennedy, and what the DOE can do to better serve students. During this time, the DOE also solicited feedback from students and community members in order to make a decision about which schools to propose to phase-out and which schools to implement different interventions. Based on these discussions, as well as an extensive analysis of data, the DOE concluded that Kennedy is unable to turn around and cannot provide a high-quality education to its students.

The DOE then undertook notification efforts to ensure that each school community, including parents, teachers, community groups, local officials and students themselves were aware of the proposal to phase-out Kennedy. The DOE distributed an “Updated Fact Sheet” that provided an overview of what the proposal would mean for current and future students, relevant information that led to the decision, and information on how to submit feedback.

A joint public hearing was held at the school on January 28, 2011, during which interested parties had an opportunity to provide input on the proposal. Approximately 90 members of the public attended the hearing, 36 people spoke, and seven questions were submitted. Finally, during the “public comment” period which began once the proposal was published, the DOE publicized an e-mail address and telephone number dedicated to accepting additional feedback about the proposal.

In response to concerns that the joint public hearing and comments regarding the proposal are not considered as part of the decision-making process, this Analysis of Public Comment records and addresses all comments submitted through the dedicated e-mail address and phone number, as well as comments made at the joint public hearing. This Analysis is provided to the Panel for Educational Policy, which consists of 13 appointed members and the Chancellor, prior to its vote on February 3, 2011. Each borough president appoints one member and the mayor appoints the remaining eight.

With respect to discussions about the co-location of two new schools in the X475 building, DOE representatives spoke with various community members, including elected officials, about what kinds of schools were needed in the community. The proposal to co-locate two new schools was not published at the same time as the phase-out proposal because the DOE had not yet determined what replacement plan was best for the X475 building.

On January 13, 2011, the *New York Times* published an article that shared draft information regarding proposed schools to go into buildings around the city. Shortly after this article was published, the DOE announced its proposal to site the two charter schools in building X475.

Elected officials and community members recognize the impact New Visions has had in supporting the other schools on the Kennedy Campus. The posting of the EIS represents the beginning of community engagement process regarding the proposal.

The DOE has been accepting public comment on this proposal and will continue to do so until the PEP votes on the proposal at its meeting on March 1, 2011.

In addition to a joint public hearing that is scheduled for February 15, 2011 to discuss the proposal, the DOE is also making efforts to introduce the proposed new leaders of the new schools to the community. On January 18, 2011, for example, Deputy Chancellor Santiago Taveras and DOE representatives held a parent meeting at Kennedy where they discussed the phase-out and replacement proposals.

- Comments 1(c), 3(a), and 18 express concerns over the scheduling of the joint public hearing. The scheduling of the hearing was consistent with Chancellor’s Regulation A-190, which describes the process for proposing significant changes in school utilization.
 - The joint public hearing was held no sooner than 30 days, but no later than 45 days after the filing of the EIS.
 - Prior to the filing, the Office of Portfolio Engagement proposed potential dates and times for the joint public hearing to the impacted CEC, all principals in the building in his/her capacity as the member of the SLT, as well as invitations to the Citywide Council of High Schools, the Citywide Council on English Language Learners, and the Citywide Council on Special Education. Principals were instructed to confer with the rest of their SLT members on availability. The Office then selected a date based on the availability of these parties.

In regards to concerns about the timing of the hearing with Regents exams, the DOE did not schedule any high school joint public hearings on the eve of a Regents exam in response to community feedback last year regarding the process.

- Comments 6(a), 7(a,b), 9, 11, 13(a,b), and 15(a-f) state that Kennedy was in need of more resources, both in terms of funding and support for staff and students.

Funding is based on the number and type of students who are being served at a school. If a school’s population declines from 2,600 to 2,100 students, the school’s budget decreases proportionally – just as a school with an increase in students receives more money. In addition, Kennedy receives additional state funds because of its low performance and federal funds because of its student population, which includes ELLs and students with disabilities.

Since the 2005-2006 school year, Kennedy has experienced a register loss of nearly 2,200 students. As a result of this drop, the school’s budget has been reduced accordingly – schools need fewer dollars to educate fewer students. However, for the 2009-2010 school year, Kennedy’s per capita budget allocation was more than \$500 greater than the Citywide average.

With regards to decisions about textbooks, staffing, and other school-level decisions, the DOE empowers school leadership to make many of those decisions in consultation with their school community and with guidance from the DOE.

More specifically, with regard to the number of science rooms in the building, there are five science labs in the building and 13 science demonstration labs, according to the Facilities Survey conducted on December 13, 2010.

In regards to support, the DOE has offered a number of supports to Kennedy:

- Leadership Support
 - Helping the principal develop Kennedy’s Comprehensive Education Plan and set school goals.

- Connecting administrators with other schools to learn effective practices that could be replicated at Kennedy.
 - Offering extensive leadership coaching for the principal.
 - Instructional Support
 - Working with the school to create Small Learning Communities in an effort to increase personalization and meet the needs of all students.
 - Training for school leadership and teachers on developing curriculum and high-quality instructional practices that align with new state standards.
 - Working with the school to create teacher teams and develop common planning time.
 - Helping teacher teams to improve instruction for ELLs, students with disabilities, and students performing below grade level.
 - Operational Support
 - Helping the school budget its dollars in a way that best meets student needs; Kennedy receives additional state funds because of its low performance and federal funds because of its student population.
 - Coaching staff on budgeting, human resources, recruiting and retaining talented teachers, and compliance issues.
 - Student Support
 - Training for guidance counselors on how to use scholarship reports and graduation tracking systems.
 - Working with school leadership to identify ways to reduce student suspensions.
 - Helping the attendance teacher use home visits and other outreach strategies to improve student attendance.
- Comments 7(a), 12, and 13 allege mismanagement on the part of past school leadership. The DOE acknowledges that the former principal of Kennedy was removed last year. Current principal Lisa Luft was appointed in July 2010. As described in the response to comments 6(a), 7(a,b), 9, 11, 13(a,b), and 15(a-f), the DOE has also offered several leadership supports to Kennedy.
- Comments 7(c) and 8 note that parental involvement at the school is low. The DOE acknowledges this and will incorporate such feedback into its work to support current Kennedy students and replacement plans for the school going forward.
- Comment 10 states that Kennedy suffered as a result of small schools phasing in. The small schools currently located in the X475 building opened in 2002, 2003, 2004 and 2008. However, Kennedy has struggled with performance for at least the last ten years. Additionally, over 50% of schools buildings in New York City house multiple schools and many are able to achieve better outcomes for their students than Kennedy.
 - Harry Truman High School, a Bronx school mentioned above that serves similar students as Kennedy and has achieved better results, shares its space with another school. Bronx Health Sciences High School, another school in the Bronx, also shares space in the building and has achieved better results than Kennedy.

- Comment 16 questions why other options were not considered for Kennedy. As discussed above, the DOE analyzed data and solicited community feedback before concluding that phasing out Kennedy would best serve the community. The decision to phase out the school was one of several possible intervention strategies considered by the DOE, which included leadership changes, changes in curriculum/program offerings, staff changes, and/or grade reconfiguration.
- Comments 25, 29 and 31 note concerns of Kennedy alumni, particularly surrounding the future status of the school building's name and historical records related to Kennedy alumni. The DOE recognizes the long history of Kennedy in the community, but notes that the school has struggled for years to provide a high-quality education to its students. The building will continue to be called the John F. Kennedy Educational Campus. Many high school campuses also choose to continue using the campus name for their athletic teams. As for historical records, the DOE will continue to archive records in accordance with already-established policies regarding student information, as it does with all schools in the city.
- Comment 30 inquires about the calculation of the four-year Regents Diploma Rate calculation. The 4-year Regents Diploma Rate cited in the EIS is based on data used in the Progress Report, not the State Report Card. It is the percentage of students in the Progress Report cohort who received a Regents Diploma or higher in 4 years, including August graduates. The State Report Card does include data on the percentage of graduates that receive a Regents Diploma and the percentage of graduates that receive a Regents Diploma with an advanced designation in the "High School Completers" section. However, that statistic is not a graduation rate and is not labeled as such.
- With regard to comment 32, 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 the lowest-performing schools with better options and opened 474 new schools: 365 district schools and 109 public charter schools. As a result, the DOE has 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, the DOE talked to school leadership, parents, SLTs, CECs, elected officials, and local CBOs about its ideas about how to improve struggling schools. The DOE convened these meetings to discuss its proposals and to hear feedback and new ideas.

The Department developed and distributed "Fact Sheets" for each school it 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 the website and distributed at meetings.

When the DOE announced the 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

The DOE has not made any changes to the proposal in response to the comments summarized above.