

Public Comment Analysis

Date: April 19, 2016

Topic: The Proposed Closure of Foreign Language Academy of Global Studies (07X520) in Building X155 at the End of the 2015-2016 School Year

Date of Panel Vote: April 20, 2016

Summary of Proposal

On March 3, 2016, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) proposing the closure of Foreign Language Academy of Global Studies (07X520, “FLAGS”), an existing high school that currently serves students in ninth through twelfth grade in building X155 (“X155”), located at 470 Jackson Avenue, Bronx, NY 10455, in Community School District 7 (“District 7”), at the end of the 2015-2016 school year. FLAGS is currently co-located in X155 with the J. M. Rapport School of Career Development (75X754, “P754X@X155”). P754X@X155 is one site of an existing District 75 program that serves students in grades nine through twelve.

The DOE is proposing to close FLAGS based on its persistently low enrollment, low performance, and lack of demand by students and families. If this proposal is approved, FLAGS will close at the end of the 2015-2016 school year and will no longer exist as a high school option beginning in the 2016-2017 school year. Current ninth-, tenth- and eleventh-grade students, as well as twelfth-grade students who are not on track to graduate, will work individually with DOE staff and will be offered seats in other district high schools. Current twelfth-grade students who meet mandated graduation requirements at the end of the current school year will graduate from FLAGS.

There is sufficient capacity in high schools throughout the Bronx to accommodate current FLAGS students, as well as future students who might have attended FLAGS if it remained open as a high school option. If the proposed closure of FLAGS is approved, all non-graduating students will receive individualized enrollment support from the superintendent’s staff and Family Welcome Center counselors, focusing on each student’s interests to find a seat that is aligned to their needs. All non-graduating students will receive alternative options for enrollment in another high school before being discharged from the closing school.

In a separate proposal also posted on March 3, 2016, the DOE concurrently proposed to co-locate grades five through eight of Academic Leadership Charter School (84X491, “ALCS”) with P754X@X155 in building X155. These proposals are not contingent on one another and will be voted on separately by the Panel for Educational Policy (“PEP”). In other words, there would still be space to co-locate grades five through eight of ALCS in X155 in the event that this proposal to close FLAGS is not approved. The Building Utilization Plan (“BUP”) attached to the co-location proposal presumes the proposal to close FLAGS is approved; if it is not approved, the BUP will be revised accordingly.

If this proposal is approved, FLAGS will close at end of the 2015-2016 school year and will no longer exist as a school option. As noted above, X155 is currently serving a total of 443 students and is therefore operating below the target capacity and building utilization rate. If the closure of FLAGS is approved by

the PEP, and if the concurrent proposal to co-locate grades five through eight of ALCS is also approved by the PEP, in 2016-2017, building X155 is projected to serve 530-710 students across ALCS and P754X@X155, yielding a projected utilization rate of 49%-66%.

The EIS can be found on the DOE's website at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/April202016SchoolProposals>.

Copies of the EIS are also available in the main offices of FLAGS and P754X@X155.

Summary of Comments Received at the Joint Public Hearing

A Joint Public Hearing was held regarding this proposal at building X155 on April 5, 2016. The hearing covered both the FLAGS closure proposal and the ALCS co-location proposal. At the Joint Public Hearing, interested parties had the opportunity to provide input on the proposal. Approximately 65 members of the public attended the hearing; one member of the public spoke, and three representatives from the Citywide Council on High Schools ("CCHS") and Citywide Council on Special Education ("CCSE") made statements. Present at the hearing were: Dorita Gibson, Senior Deputy Chancellor; Michael Alcott, Renewal High School Superintendent; Beverly Ffolkes-Bryant, District 75 Field Support Center Liaison for Borough 4-Bronx; Constance Asiedu, President of CCHS and Nedyia Franco, member of CCHS; Pamela Stewart, President of CCSE; Leslie Chislett, Principal of FLAGS; Daniel Hoehn, Principal of P754X@X155; David Frank, Office of School Design and Charter Partnerships; Samantha Gounden and Treniece Sullivan, Office of Student Enrollment; Yissel Martinez and Debra Kelly, Office of Human Resources at the Bronx Borough Field Support Center. Jyoti Folch, Bridget Mercier, and Jonathan Geis from the DOE's Office of District Planning were also present. The District 7 Community Education Councils ("CEC 7") confirmed acceptance of an invitation to attend the hearing, but no CEC 7 members ultimately attended due to unexpected scheduling conflicts.

The following questions, comments and remarks were made at the Joint Public Hearing

1. Superintendent Michael Alcott commended Principal Chislett on her efforts and the work being done at FLAGS, but stated the school's low enrollment is unsustainable and therefore the DOE is proposing to close the school.
2. CCSE President Pamela Stewart commented as follows:
 - a. She is impressed with the school administration's efforts to rejuvenate the school and this is evidenced by FLAGS' success in the current school year (2015-2016).
 - b. The DOE made a three-year commitment to all Renewal Schools and it is unfair to the school and students to propose the school for closure before this three year period concludes.
 - c. She is saddened that although FLAGS made strides this school year and met their Renewal School metrics, the High School Directory provides data and information on NYC High Schools from the previous year. She feels that if the High School Directory reflected FLAGS' data from the current school year (2015-2016), more NYC students might have been more inclined to apply.
 - d. She is generally happy with Mayor De Blasio's performance thus far, but was disappointed to see that two of his campaign promises have not yet been fulfilled.

- e. The first failed campaign promise was to pursue strategic staffing initiatives that would place successful teachers at low performing schools in an effort to turn the schools around. She feels that FLAGS was not given this opportunity.
 - f. The second failed campaign promise concerned reducing class sizes, and she suggested that since FLAGS has low enrollment and small class sizes, it could stay open as a pilot to assess the outcomes of smaller class sizes.
 - g. She hopes that the DOE will reconsider the proposal to close this school and keep it open for the full three-year Renewal School timeframe, and then the DOE can make an assessment as to whether to close the school.
3. CCHS President Constance Asiedu commented as follows:
- a. She speaks on behalf of the students that will now need to be transplanted to another school, expressing concerns about the placement of students in different schools if FLAGS is closed.
 - b. She would like the DOE to track all students from schools that are closing in an effort to ensure that these students' needs are met and that they receive appropriate placements.
 - c. If the DOE tracks these students, then, in the event that students are not happy with their new placement, they should be able to transfer to a different school.
 - d. She understands the proposed closure from an enrollment perspective, but is unhappy with the timing of this announcement, as students were not given enough time to prepare for this change.
 - e. She hopes that students are matched to high schools that have similar programming to FLAGS and fit their needs.
4. CCHS member Nedyia Franco commented as follows:
- a. She sympathizes with the students who will now be forced to make another choice for high school, as well as with the families and communities of the displaced students.
 - b. She is disappointed with the supports provided to this school and this community, noting that increased outreach efforts could have been made to attract more students.
 - c. As an adult, she knows how difficult transitions can be and is sad that students are being asked to move to a new school; ninth graders who just moved from their middle school and eleventh graders who only have one year left must now leave the school.
 - d. She is empathetic to the students who will now need to go through the entire high school application process again by applying through Round Two of the process.
 - e. She suggests that re-siting the school to a new building would have been better for FLAGS.
 - f. She suggests tracking these students to learn from this situation and understand better what happens to these students once enrolled in a different school.
 - g. She hopes that students will receive special services in an effort to assist with the transition.
5. One public commenter commented as follows:
- a. She is part of a group called "Change the Stakes," which is made up of teachers and parents who are concerned with a number of policies affecting NYC schools, with particular focus on schools in receivership.
 - b. She stated that it would be a mistake to close FLAGS.

- c. After hearing the graduation statistics and low demand data of FLAGS, which was read aloud by Deputy Chancellor Gibson at the beginning of this hearing, she believes that this school has already been abandoned since the school has been declining in enrollment and performance for several school years
- d. She inquired about whether FLAGS and ALCS could be co-located in the building rather than closing FLAGS, since the building has space for both schools.
- e. She also asked why the DOE waited so long to tell the families because students did not apply to any other schools in the first round of the High School Application Process since they assumed the school would remain open. Now students must apply in the second round and might not be able to obtain their top choices.
- f. She is frustrated with the lack of transparency from the DOE, and senses that families feel betrayed and deceived.
- g. The DOE had considered several scenarios for FLAGS, including merging FLAGS with another school or re-siting it to a different high school campus, and if the DOE was considering these scenarios it seems that they were aware much earlier in the school year that a proposal would be issued but chose not to issue one until later or include the school in those conversations.
- h. The receivership system is stigmatizing to schools because once that label is attached to a school, it becomes difficult to recruit teachers and students because who would want to join a school that appears to be a “sinking ship.”
- i. FLAGS was promised School Improvement Grant funds that did not arrive until the two weeks before the DOE announced it was proposing to close the school.

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

The DOE did not receive any comments through the dedicated email address or the dedicated phone line for this proposal.

Analysis of Issues Raised, Significant Alternatives, Significant Alternatives Proposed

Comments 1 and 2(a) highlight FLAGS’s achievements and growth during the 2015-2016 school year, and comments 1, 2(e), 4(b), and 5(b)-(c) relate to DOE’s decision to propose the closure of FLAGS.

In response to comments 1 and 2(a), the DOE commends FLAGS’s principal and school community for their hard work and dedication.

That said, in response to the other comments, the DOE has implemented an expanded support and supervision structure that allows regular engagement and evaluation of schools to ensure that every student in New York City receives a high-quality education and is prepared for post-secondary success. As a result of this increased support, the DOE has identified that FLAGS has experienced persistently low enrollment, performance issues, and lack of demand by students and families. At FLAGS, these ongoing challenges have contributed to a loss of per pupil funding, high staff turnover, and fewer extracurricular and athletic opportunities—all of which negatively impact the school’s ability to improve student achievement. Student learning experiences are limited in variety beyond core subjects. Additionally, teachers have fewer opportunities for instructional collaboration with colleagues, as they are often the

only staff member teaching a particular subject area.

Persistent difficulties faced by FLAGS include:

- Low demand: as of October 31, 2015, FLAGS was the fourth lowest-enrolled district high school in the City. For the 2015-2016 school year, FLAGS had only 1.2 applicants per seat, with only 9 applicants out of 114 who listed the school as their number one choice, and only 12 students received a match to this school through Round 1 of the High School Admissions Process.
- Declining enrollment: over a five-year period, enrollment has dropped by nearly 75% (388 students enrolled in the 2010-2011 school year versus 99 students enrolled in the 2015-2016 school year).
- Low graduation rate: in the 2014-2015 school year, FLAGS' four-year graduation rate was just 43%, compared to the Bronx's average graduation rate of 62% and the City's average graduation rate of 71%. This was the 12th lowest graduation rate in the City last year, with only 19 out of 44 twelfth-grade students graduating. Additionally, only 2% of FLAGS students graduated college-ready, compared to the Bronx's average rate of 22% and the City's average of 35%.

Despite programmatic, leadership, and structural interventions, FLAGS continues to struggle with enrollment and performance. Comment 4(b) expresses frustration around lack of outreach efforts in an attempt to attract students to the school; however, FLAGS is presented the same opportunities to recruit students as any other district high school. FLAGS is listed in the High School Directory each year as an option and can participate in the High School Fairs, which include both Citywide and Borough events. Despite these opportunities, the data shows that there continues to be low demand for FLAGS.

Comments 2(b), 2(c), 2(g), 5(a), 5(c), and 5(h)-(i) pertain to various state and city designations FLAGS has received, how those may relate to the proposed closure, and whether FLAGS has had sufficient time to benefit from those designations in order to improve.

The New York State Education Department (“SED”) has identified FLAGS for receivership under the DOE’s Chancellor, which means that FLAGS must make progress on certain benchmarks to avoid being placed under the receivership of an independent receiver. In addition, FLAGS was one of a cohort of 94 schools that have been designated by the DOE as a Renewal School. Schools selected to be Renewal Schools were assigned the state accountability status of Priority or Focus Schools by SED, demonstrated low academic achievement (in 2012, 2013, and 2014), and scored “Proficient” or below on their most recent Quality Review at the time of selection. None of these designations precludes FLAGS from receiving additional intervention, such as closure, to address its persistent challenges.

The Mayor, Chancellor, and DOE leadership closely monitor Renewal School progress via regular data reports and frequent visits to the school. Renewal Schools have at most three years to show significant improvement before the DOE considers restructuring the school. If the school fails to meet benchmarks each year, the Superintendent will make the changes necessary to ensure that each child in the school has a high-quality education. Such changes may include school closure, as is the case for FLAGS. The DOE feels that schools need to be held accountable for raising student achievement, and when a school’s enrollment is persistently low – and continues to decline – it simply cannot provide the services students need to thrive.

With specific regard to comment 2(c)—which expresses disappointment that FLAGS’ current 2015-2016 school data (which the commenter asserts met Renewal School benchmarks) was not reflected in the 2016 High School Directory for students and families to consider when applying to high school—the DOE notes that the High School Directory is published by June of each year so that students at the end of their 7th grade year can review the directory during the summer before their 8th grade year. The data contained in the High School Directory reflects the most recent data available for each school at the time of

publication, which is the same for all high schools. The DOE also publishes School Quality Reports, which can be accessed here: <http://schools.nyc.gov/Accountability/tools/report/default.htm>, and other data on DOE schools can be found at: <http://schools.nyc.gov/Accountability/data/default.htm>. In addition, according to the most recent data available (2014-2015 school year), FLAGS did not meet its Renewal benchmarks. Benchmarks for the 2015-2016 school year are not yet available, as the school year has not ended. FLAGS' Renewal and Receivership Benchmarks can be found at: http://schools.nyc.gov/documents/reports/renewbenchmark/renewreceive/Renewal_and_Receivership_Benchmarks_2015_07X520.pdf. Benchmarks for any Renewal School can be found on the school's Statistics and Budget page in the school portal.

With respect to comment 5(i), which asserts that FLAGS received its School Improvement Grant funding in February 2016, the DOE notes that it was actually dispensed in December 2015.

Comments 3(a)-(c), 3(e), 4(a), 4(c)-(d), 4(f)-(g), and 5(e) relate to student placement and the High School Admissions Process specifically pertaining to FLAGS students.

These comments express concern about where FLAGS students will be placed and whether their needs will be met if the school is closed. As stated in the EIS, if the proposed closure of FLAGS is approved, all ninth-, tenth-, and eleventh-grade students will receive individualized enrollment support from the superintendent's staff and Family Welcome Center counselors, focusing on each student's interests to find a seat that is aligned to his or her needs. All students will receive alternative options for enrollment in another school before being discharged from FLAGS. Examples of other high schools in the Bronx that offer similar programmatic offerings (Humanities and Interdisciplinary Focus) are provided in Appendix A of the EIS. Current twelfth-grade students at FLAGS who are not on track to graduate will also receive individualized enrollment support from the superintendent's staff and Family Welcome Center counselors, who will assist such students to enroll in a different high school for the 2016-2017 school year. Current twelfth-grade students who meet mandated graduation requirements at the end of the current school year will graduate from FLAGS. In addition, students currently receiving special services, such as special education and/or English as a Second Language services, will continue receiving these services at their new placement.

With specific regard to comment 4(d), which suggests students will be required to go through the entire high school application process again and comment 5(e), which assumes students will be at a disadvantage by joining in Round 2 of the High School Admissions Process, the DOE notes that due to the nature of this proposal, FLAGS students will not follow the normal admissions process. Current ninth-, tenth- and eleventh-grade students, as well as twelfth-grade students who are not on track to graduate, will work individually with DOE staff and will be offered seats in other district high schools. The school principal in collaboration with the Superintendent's Office and the DOE's Office of Student Enrollment will consult with families to assist them with the application during school-based enrollment sessions. Appropriate school and superintendent staff will support families in completing the application. There will be multiple counseling sessions scheduled in the near future to explain all options available to families of FLAGS. The DOE is committed to providing families with multiple options that will prove to be a better educational experience for students of FLAGS. Specifically, in an effort to ensure students will have high quality options, students will be offered a list of "Good Standing" schools from which to consider school selections. Current twelfth-grade students who meet mandated graduation requirements at the end of the current school year will graduate from FLAGS. If the PEP approves the closure of FLAGS, any students who received a match to FLAGS for the 2016-2017 school year will receive a new placement in Round 2 of the High School Admissions Process.

In specific response to comments 3(b)-(c) and 4(f), which recommend tracking students who have been impacted by a closure in an effort to ensure appropriate placement as well as assess student outcomes, as

mentioned, the DOE is committed to providing students a better educational experience. The DOE will work closely with all parties involved and commits to tracking the placements so that every student knows their newly enrolled school for September.

Comment 2(f) expresses a belief that the City has not done enough to reduce class sizes and suggests FLAGS could remain open as pilot program to assess viability of smaller class sizes.

While the DOE acknowledges that small school environments work better for some students, certain school sizes may be too small to remain viable options when they are unable to offer the necessary budgetary and programmatic resources that students need for an appropriate and successful educational experience. Further, FLAGS currently has smaller class sizes than the Bronx average, but has still struggled with performance and other issues. According to 2015-2016 data, average GE/ICT class size for FLAGS is 17.1 whereas average GE/ICT class size for Bronx high schools is 25.1. Class size data is available on the DOE website at: <http://schools.nyc.gov/NR/rdonlyres/6452F869-51D6-4B7D-A99D-15242BB1CA40/0/201516FebruaryClassSizeReport.pdf>.

Comments 3(d) and 5(f)-(g) relate to frustrations around the timeline for and ultimate decision to propose the closure of FLAGS.

The DOE regrets that some families may feel disappointed or frustrated with the timeline for and decision to propose the closure of FLAGS. The DOE seeks to continuously provide a transparent and accountable environment, and continuously aims to improve trust between the DOE and school communities.

With specific regard to comment 3(d) expressing disappointment concerning the timing of the proposed closure announcement, for all proposals related to a significant change in school utilization, the DOE offers multiple opportunities for community engagement, including opportunities mandated by Chancellor's Regulation A-190 (making the proposal available online and in hard copy, providing notice of the Joint Public Hearing and PEP vote, holding a Joint Public Hearing, collecting public comments concerning the proposal, and preparing an analysis of public comment), as well as offering additional opportunities, such as an optional community meeting for each impacted school. For the current proposal to close FLAGS, the DOE offered the following information dissemination and opportunities for engagement:

- Calls were made to families in both the morning and afternoon of February 25, 2016 and again on February 27, 2016, in both English and Spanish to notify them of the proposed closure and the community meeting scheduled for March 1, 2016;
- Letters notifying families of this proposed closure and the March 1, 2016 community meeting were backpacked home with students on February 25, 2016;
- The Superintendent, along with key support from central offices, held a community meeting on March 1, 2016, to answer any questions from families;
- The EIS and BUP were issued on March 3, 2016 and distributed to the school communities;
- The DOE offered an optional supplemental community meeting prior to the Joint Public Hearing for this proposal; and
- The DOE held a Joint Public Hearing for this proposal on April 5, 2016.

As mentioned, the PEP is scheduled to vote on this proposal, along with several others, at its April 20th meeting at M.S. 131, located at 100 Hester Street, New York, NY 10002. The PEP meeting is open to the public, and attendees have an opportunity to provide public comment before the PEP members and Chancellor.

As described above, the DOE will work with families to find quality high school placements for current FLAGS students who will not graduate at the end of the 2015-2016 school year. The DOE therefore believes that FLAGS students will not be disadvantaged by the timing of this closure proposal.

Comments 4(e), 5(d), and 5(g) note various potential scenarios that were being considered for FLAGS, or which should have been considered for FLAGS.

The DOE reviewed and considered several options for FLAGS before deciding to propose closure, including consolidation and re-siting scenarios. It was concluded that closure would be best for the students of FLAGS. In specific response to comment 5(d), it is true that building X155 has sufficient capacity to support both FLAGS and ALCS as a co-location with P754X@X155. However, as described above, the DOE feels that the closure of FLAGS is in the best interests of students because enrollment has dropped too low for FLAGS to offer an appropriate educational experience in light of the budgetary and programmatic challenges the school faces.

Comment 2(d) is not directly related to the proposal and thus does not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.