Department of Education
Cathleen P. Black, Chancellor

Public Comment Analysis

Date: February 28, 2011

Topic: The Proposed Co-location of Two New Schools, 11X529 and 11X532, with M.S. 142 John Philip Sousa (11X142) in Building X142

Date of Panel Vote: March 1, 2011

Summary of Proposal

Beginning in the 2011-2012 school year, the New York City Department of Education ("DOE") proposes the "co-location" of two new middle schools, 11X529 and 11X532, that will each serve grades 6-8 in school building X142 ("X142"), located at 3750 Baychester Avenue, Bronx, NY, 10466, in Community School District 11. 11X529 and 11X532 would be co-located with M.S. 142 John Philip Sousa (11X142, "M.S. 142"), an existing zoned middle school serving grades 6-8. 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.

School building X142 is under-utilized as a result of declining enrollment at M.S. 142, which reflects lower demand for M.S. 142 as more options for middle school have been made available to X142 zoned students through the District 11 Middle School Choice process. The opening of two new District 11 choice middle schools addresses parents' desire for more unzoned options in the district.

If approved, 11X529 and 11X532 would phase-in gradually with the first cohort of sixth graders in 2011-2012, and add an additional grade each year until they complete their phase-ins to serve grades 6-8 in 2013-2014 school year. The admissions policies at 11X529 and 11X532 will be the same. Both schools would first admit students who reside in the X142 zone (unscreened) and then admit students through the District 11 Middle School Choice process and use a Limited Unscreened selection method. Limited Unscreened schools give admissions priority to students who demonstrate interest in the school by attending an Information Session, Open House events, or visiting the school's exhibit at any one of the Middle School Fairs.

As 11X529 and 11X532 phase in, the number of sixth graders admitted to M.S. 142 will decrease and the school's overall enrollment will decline over the course of the next three years as the school will only be projected to enroll three sections of incoming sixth grade students, as opposed to the 11-13 sections it has historically enrolled. In 2011-2012, M.S. 142 would continue to be a zoned middle school. However, in 2012-2013, M.S. 142's admissions process would be consistent with 11X529 and 11X532—it would admit all zoned students, then students

who apply through the District 11 Middle School Choice process. The intent is to create campus choice among three small district choice middle schools in the X142 building. All three schools would admit students through the District 11 Middle School Choice process and offer priority to students who reside in the X142 zone. In addition, as a smaller school, M.S. 142 will be able to focus attention on a smaller cohort of students, thereby enabling M.S. 142 to more efficiently personalize instruction and serve its students.

The two new schools will appear on the District 11 New Middle School Choice application in March 2011. Students will be able to rank 11X529 and 11X532 in the New Middle School Choice Application Round.

The details of this proposal have been released in an Educational Impact Statement which can be accessed here: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Mar12011Proposals.htm. Hard copies of the EIS are also available in the M.S. 142 main office.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at X142 on February 17, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 60 members of the public attended the hearing and 9 people spoke. Present at the meeting were: District 11 Community Superintendent Elizabeth A. White; District 11 Community Education Council ("CEC 11") President Petra Poleon and Parliamentarian Jaine Matthews (also the M.S. 142 Parent Teacher Association ("PTA") President); M.S. 142 Principal Casimiro Cibelli and School Leadership Team ("SLT") representatives Assistant Principal Tollyne Dickerson and UFT chapter leader Dr. Gretchen Hazell. Remarks were also made by Community Board 12 member and chair of the youth education department Johnnie Goff on behalf of New York City Council Member Larry Seabrook's office.

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

1. CEC 11 President and M.S. 142 PTA President Janie Matthews stated the need to identify the community's expectations for M.S. 142 and for its students. She emphasized the need for parents to provide stable homes and the role of the CEC and PTA in helping explore ideas to improve the school. She said there would be future sessions to discuss how the larger community can be a part of the solution.
2. Principal Casimiro Cibelli thanked parents for coming to the hearing tonight.
3. CEC 11 President Petra Poleon described the role of CEC 11 in discussing and identifying strategies that will improve academic expectations for students.
4. M.S. 142 SLT representative and UFT chapter leader Dr. Gretchen Hazell stated her hope for an informative meeting.
5. Johnnie Goff emphasized the need for community involvement in decision-making surrounding the shape and make-up of the three schools that would be a part of the new campus. She also raised the following concerns:
    a. Programs at all three schools must fit the needs of students, and parents must be as transparent as possible in expressing those needs.

    b. Principals at all three schools must consider children first, encourage parental involvement, and allow the community to be a key support piece.
    c. Parents must be aware in a timely fashion about meetings to discuss the new schools and they must show support by coming to meetings.
6. Multiple commentators expressed their pride for M.S. 142 and their support for the school's community, history and alumni organization, extracurricular programs and community partnerships.
7. Multiple commentators expressed their disappointment that more parents did not come to the meeting and that there should be more support for M.S. 142. A commentator also inquired when notices went out to parents.
8. Multiple commentators expressed the need for the community to be involved with decision-making over the future leaders and teachers at the new schools.
9. Multiple commentators expressed concern over the experience of the future leaders, the timeline of the selection process and the purported failure to consider senior principals that work at M.S. 142 for the new leadership positions at 11X529 and 11X532. The commentator also expressed the fear that there would be a "round robin" of changes in principals in the future.
10. Multiple commentators raised concern over what kind of education future students will be getting and stated the need for a well-rounded education with music, art, and sports. A commentator also expressed concern about the effect of the new schools' new curriculum on students.
11. A commentator expressed the view that the DOE did not allow sufficient time to examine what could have been done to improve M.S. 142. The commentator said other schools have also suffered from falling ELA and math scores.
12. A commentator stated that the Footprint should not state that the building can fit 1,200 students, when it really can only fit 900 students.
13. A commentator expressed concern that the new schools would be charter schools and that M.S. 142 students would be "split up" next year.
14. A commentator expressed concern over possible safety and traffic issues with three schools in the building, citing experiences at Truman High School.

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

1. A commentator stated that the National Association for the Advancement of Colored People has looked at the process of school phase-outs and questions whether it is helping students.

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

The DOE received two comments by e-mail and one comment by telephone.

15. A commentator expressed opposition to the proposal for the following reasons:
    a. Some small schools have already closed in the City.
    b. There should be other solutions, such as alternative programs for students who have repeated grades or vocational programs in middle schools.

c. One of the prospective new school's principal does not have enough teaching experience in the classroom. An assistant principal should have at least five years of teaching experience, and then should be able to apply after several more years to become a principal. Solely completing a principal leadership program is not sufficient.
d. The current name of one of the new schools should be reconsidered from "One World" to a different school name, such as one dedicated to the late principal at M.S. 142, Dr. Hill Wilson Brindle.

16. A commentator expressed pride for the M.S. 142 community and raised several concerns:
    a. There was a lack of parental participation at the hearing, but that does not signify a lack of concern about the proposal.
    b. The new school leaders have not been a part of the community and current administrators in the building should have been considered to help turn the school around.
    c. The M.S. 142 staff understands what is needed at the school; problems at M.S. 142 should not be attributed to teachers and would be better addressed by those who have worked at the school.
17. A commentator questioned how increasing the enrollment in the X142 building and co-locating two new schools would improve the quality of education in the building. Specifically, the commentator identified bullying as an issue in the school building that would worsen with additional students. The commentator also inquired whether the increased enrollment would result in additional money for M.S. 142.

The DOE received an oral comment by telephone that did not directly relate to the proposal and therefore will not be addressed.

1. A commentator asked how the DOE will address possible layoffs of teachers and the effect it will have on students.

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

- Comments 1, 2, 3, 5, 7, and 16(a) concern the importance of parent and community involvement, including that of the CEC, in supporting students and schools. The DOE also encourages and believes in the importance of active involvement in schools from parents and community members.
    - Comment 5 further emphasized the need for all three schools in the X142 building to consider students first, and for information about any meetings to discuss the new schools to be disseminated in a timely manner. If the proposal to open and co-locate two new schools in the X142 building is approved, the DOE will promptly arrange for such a meeting about the two new schools to be held, and information about any meetings will be disseminated in a timely manner. The meeting will likely be held shortly after the PEP votes on this proposal on March 1 to maximize the amount of time parents have to complete the new middle school applications in an informed manner prior to the deadline for submission.

- Comment 7 queried when notices about the joint public hearing were sent to parents. The Public Notice, also available on the DOE website at http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Mar12011Proposals.htm, was backpacked home shortly after the proposal was posted on January 14, 2011. Principal Cibelli also reported that a flyer regarding the hearing was distributed at the school and backpacked home a second time in the days just prior to February 17.

- Comment 4 expressed hope that the hearing be informative. This comment does not require a response.

- Comment 6 expressed the pride many parents and community members have for the school and its history. The DOE hopes this pride continues and grows to encompass the successes and accomplishments of all three schools that will be in the X142 building.

- Comment 8 related to community involvement in decision-making about the new school leaders and teachers. To date, district and community leaders have participated in the process to select strong leaders for the new schools proposed to open in the X142 building in September 2011. If the two schools are approved to open, the new leaders will involve various members of the community in their planning and hiring processes as appropriate.

- Comments 9 and 16(b) expressed several concerns relating to the proposed new school leaders – their experience, the timeline for their selection, the DOE's consideration of M.S. 142 assistant principals, and expectations for how long the new leaders would stay.
    - All candidates must meet the same requirements in order to be eligible for appointment as a principal in a NYC public school, and the Department of Education seeks outstanding, qualified educators to become school principals in several ways. An individual who is interested in becoming a principal can apply to do so by entering the Principal Candidate Pool.
    - Each year the DOE develops a strong pipeline of school leaders by actively soliciting proposals from a variety of sources including people currently working in schools and external organizations with proven track records of success in new schools. The DOE is confident that the new district schools created by leaders selected through this process will be characterized by academic rigor, personalization and community partnerships.
    - No current M.S. 142 assistant principals applied for leadership positions at the new schools.
    - The leaders for the two new middle schools proposed to open in the X142 building were selected through the new district school process, and are eligible principal candidates from the pool.

- Comment 10 expressed concerns about the type of education future students will receive in the X142 building, include the impact of a new curriculum. The DOE believes it is important to provide different school options so that each student and family can select the school that offers an educational experience most suited to them. While the offerings

of the two new middle schools may be different from those of M.S. 142 and other existing middle schools, they will be academically rigorous, will align with the same standards and requirements, and will meet the needs of their students.

- Comment 11 contends that the DOE did not sufficiently examine what can be done to improve M.S. 142. This proposal to open and co-locate two new middle schools in the X142 building with M.S. 142 is not intended to address the issues of low performance at M.S. 142. It is in response to the under-utilization of the building and is intended to address parents' desire for more unzoned options in District 11. The DOE continues to evaluate what measures will be most appropriate to address the issues of performance at M.S. 142, and no decisions on that topic have been made yet.

- Comment 12 contends that the capacity of building X142 stated in the EIS is inaccurate. The comment cites the Footprint as the source of building capacity information, however the correct source is the Enrollment, Capacity, Utilization Report.
    - The Enrollment, Capacity, Utilization Report is available at http://source.nycsca.org/pdf/capitalplan/2009-10/BB_2009_2010.pdf. A building's target capacity is calculated by aggregating the "target capacities" of all the school organizations in the building. Each school organization's "target capacity" is calculated based upon the scheduled use of individual rooms as reported by principals during an annual facilities survey, the DOE's standards for maximum classroom capacities (which are lower than the UFT contractual class sizes and differ depending on grade level), and the efficiency with which classrooms are programmed (i.e., the frequency with which classes are scheduled in a given classroom).
    - The most recent year for which target capacity has been calculated for buildings is 2009-2010. Each of the factors underlying target capacity may be adjusted by principals from year to year to better accommodate students' needs.

- Comment 13 expressed two concerns:
    - The first concern was that the new schools would be charter schools. The current proposal is for two new district schools to open and be co-located with M.S. 142. These schools will not be charter schools.
    - The second concern is that M.S. 142 students will be "split up" next year. All students currently attending M.S. 142 will continue at the school until they articulate to high school. Only incoming middle school students – rising sixth graders – will enroll in the new schools next fall, as the new schools will open with only 6th grade, and will phase-in over time. Students at M.S. 142 will therefore not be "split up" next year as a result of this proposal.

- Comment 14 expressed concerns over safety and traffic issues. Though the number of schools in the X142 will increase from one to three next year, the net increase in the total number of students being served in the building will occur gradually over the next three years. The leaders of the three schools will work together, along with the principals of other area schools, to plan for and address all possible safety and traffic issues that may arise as a result of the higher number of students attending school in the building.

- Comment 15 expressed several concerns:
    - Comment 15(a) observes that some small schools have already closed in the City. In fact, of the 365 schools the DOE has opened since 2003, less than 2% have been closed.
    - Comment 15(b) requests that other solutions should be developed for students who have repeated grades. The DOE is currently discussing and evaluating all possible ways to meet the needs of all students, including those overage students in middle school who may have repeated grades.
    - Comment 15(c) relates to the qualifications of the leaders selected to open the two new schools proposed to co-locate in X142. As noted above in response to comment 9, all principal candidates must meet the same requirements in order to be eligible for appointment as a principal in a NYC public school, and the Department of Education seeks outstanding, qualified educators to become school principals in several ways.
    - Comment 15(d) proposes an alternative name one of the new schools, which is currently called "One World." The names of new schools are developed by the proposed school leader in conjunction with the DOE, and are often selected to reflect the focus and design of the new school.

- Comment 16(c) notes that the staff at M.S. 142 understand the issues at the school, and that the current staff should have worked to address these issues. The DOE believes that M.S. 142 staff have worked to improve student outcomes. They will continue to be a part of decision-making at M.S. 142 and the DOE hopes they will continue to be key stakeholders in the X142 campus when the new schools are co-located in the building.

- Comment 17 questioned how increasing enrollment in the X142 building and co-locating two new schools would improve student outcomes. As a smaller school, M.S. 142 will be able to focus attention on a smaller cohort of students, thereby enabling M.S. 142 to more efficiently personalize instruction and serve its students. The DOE believes that the low demand at M.S. 142 indicates that families are looking for alternative choices in District 11. By limiting the incoming sixth grade at M.S. 142, the DOE will create a campus choice model in the X142 building, expanding and improving the middle school choices available to families in the X142 zone and throughout District 11. Campus choice models encourage schools to develop distinguishing middle school choice program options to compete with other schools on campus and attract students.

  With respect to whether M.S. 142 will receive additional funding, new district schools are provided with a fixed per school allocation and a variable per pupil allocation of funds to cover start-up costs. Based on current one-time allocations for new schools, 11X529 and 11X532 will each receive a fixed allocation of $80,000 during their first year. In addition, both schools will receive approximately $4,059.71 in per pupil allocations. Beginning in their second year of operation, 11X529 and 11X532 will each receive approximately $225,000 in annual fixed Fair Student Funding foundation allocations to fund administrative costs and an additional $85,000 in Children First supplemental funding. This estimate is based on current Fair Student Funding (FSF) per capita allocations and related grade level weights. The student achievement and need-based allocations are not

taken into account in this estimate because incoming students' achievement levels and needs cannot be predicted. All money allocated through FSF can be used at the principal's discretion. All dollar amounts are based on FY 11 allocations and are subject to change based on adjustments to the DOE's overall operating budget. Because M.S. 142 is not a new district school, it is not eligible for start-up funding.

As a result of the downsizing, the total number of students enrolled at M.S. 142 will decline each year, meaning that the school will need fewer teachers and fewer supplies to meet the needs of its smaller student population. Funding will be provided in accordance with enrollment levels, allowing the school to meet the instructional needs of its student population. This is how funding is awarded to all schools throughout the City, with budgets naturally increasing or decreasing as enrollment fluctuates from year to year.

The basic operating budget for schools is determined by the same Fair Student Funding (FSF) formula used at all other New York City District public schools. Under FSF, schools receive City tax levy funding on a per pupil basis. Each student receives a per-pupil allocation based on the grade level of the student. FSF allocations are subject to annual variation, but for 2010-2011, the base per-pupil allocation for middle schools was $4,384.81. In addition, FSF awards supplemental allocations on a per-pupil basis for students who have additional needs and therefore cost more to educate. For example, during the 2010-2011 school year, middle schools received an additional $2,031.00 per pupil for each English Language Learner they enrolled. At the elementary level, supplemental funds are awarded for each student who is an English Language Learner, who requires special education services, or who is eligible for free or reduced-price lunch. For middle and high schools, supplemental funds are awarded to each student who is an English Language Learner, who requires special education services, or who is performing below grade level upon enrollment. In the case of students who fall into more than one of these categories, schools are awarded supplemental funding to meet all of those needs.

FSF covers basic instructional expenses and FSF funds may, at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs. As the total number of students enrolled grows, the overall budget will increase accordingly, allowing the school to meet the instructional needs of its larger student population. Similarly, if the total number of students enrolled falls, the budget shrinks accordingly, as the school will need fewer supplies and potentially a smaller staff.

As with all other schools Citywide, M.S. 142 may receive additional "categorical" funding based on student characteristics and needs. For example, federal Title I funding is awarded to schools based on the proportion of low-income students they enroll. M.S. 142 is currently eligible for Title I funding. Assuming that the school continues to meet Title I criteria, the size of their respective Title I funding awards would grow or shrink as the school population grows or shrinks.

While schools do receive supplemental support for special education students through Fair Student Funding, that only represents part of the funding provided to support those

students. Schools are budgeted to meet the needs of their special education students as defined by their Individualized Education Plans (IEPs). M.S. 142, 11X529, and 11X532 will receive funds to meet the needs of all special education students in accordance with their IEPs.

Please note that increased or reduced per capita funds allocated to the school as a result of changes in enrollment that may occur do not represent net/incremental system costs. All dollar amounts are based on FY10 allocations and are subject to annual variation based on adjustments to the DOE's overall operating budget.

Finally, the comment states that bullying is an issue in the building and predicts that it will increase with more students in the building. Pursuant to Chancellor's Regulation A-414, every school/campus must have a School Safety Committee. The committee plays an essential role in the establishment of safety procedures, the communication of expectations and responsibilities of students and staff, and the design of prevention and intervention strategies and programs specific to the needs of the school. To the extent that staff or parents have concerns about building safety, such concerns should be reported to the School Safety Committee and the lead safety agent.

Changes Made to the Proposal

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