

### Public Comment Analysis

Date: May 28, 2014

Topic: The Proposed Opening and Co-Location of a New Site of an Existing District 75 School P811Q (75Q811) with P.S./M.S. 147 Ronald McNair (29Q147) in Building Q147 Beginning in 2014-2015

Date of Panel Vote: May 29, 2014

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### Summary of Proposal

On February 28, 2014, the New York City Department of Education (“DOE”) posted a proposal to open and co-locate a new site of P811Q (75Q811, “P811Q”), an existing District 75 school, in building Q147 (“Q147”) and mini-building Q851, to be called “P811Q@Q147,” beginning in the 2014-2015 school year. Building Q147 is located at 218-01 116<sup>th</sup> Avenue, Queens, NY 11411 in Community School District 29 (“District 29”). If this proposal is approved, P811Q@Q147 will be co-located with P.S./M.S. 147 Ronald McNair (29Q147, “P.S./M.S. 147”), an existing district school serving students in kindergarten through eighth grades and offering a pre-kindergarten 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.

On April 10, 2014, the Notice of Joint Public Hearing for this proposal was amended to reflect a new date on which the Panel for Educational Policy will vote on this proposal.

Based on projected need for District 75 seats, the District 75 office is seeking to increase its capacity to serve students with autism and intellectual disabilities within Queens. If this proposal is approved, the DOE will open a new site for an existing District 75 school, P811Q, in the 2014-2015 school year to help meet this growing demand. P811Q@Q147 will serve a range of students across grades kindergarten through eight who are classified as autistic or intellectually disabled under an Individualized Education Program (“IEP”). P811Q@Q147 is projected to serve six sections of students in self-contained sections in 12:1:1, 8:1:1, or 6:1:1 classroom settings (ratio of students: teacher: paraprofessional). Students are placed in District 75 programs based on their individual needs and recommended special education services, and are referred to District 75 during a period that extends into summer. Students may be served in this program throughout the course of their elementary and middle school education.

Q147 also houses a community-based organization (“CBO”), New York Junior Tennis League, as well as Community Education Council 29. This proposal is not expected to impact the continued siting of these organizations in Q147.

According to the 2012-2013 Enrollment, Capacity, Utilization Report (“Blue Book”), Q147 has a target capacity of 1,002 students. During the 2013-2014 school year the building is serving 700 students, yielding an estimated building utilization rate of 70%. This means that the building is “under-utilized” and has space that could be used more efficiently to accommodate additional students. If this proposal is approved, P811Q@Q147 will open in September 2014 serving six self-contained sections of elementary and middle school students, for a total of 36-72 students. In the 2014-2015 school year, when P811Q@Q147 opens, it is projected that there will be 714-840 students served in Q147, yielding a building utilization rate of 71%-84%.

The details of this proposal have been released in an Educational Impact Statement (“EIS”), which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/SchoolProposalsMay62014PEP>.

Copies of the EIS are also available in the main offices of P.S./M.S. 147 and P811Q.

### **Summary of Comments Received**

A joint public hearing regarding the proposal was held at P.S./M.S. 147 on April 9, 2014. At the hearing, interested parties had an opportunity to provide input on the proposal. Approximately 60 members of the public attended the hearing and 8 people spoke. Present at that meeting were: District 29 Community Superintendent Lenon Murray; District 29 Community Education Council (“CEC 29”) President Alicia Hyndman; Halima Hailey, representing the P.S./M.S. 147 School Leadership Team; Anthony Caponera representing the P811Q School Leadership Team; and Jillian Roland and Sarah Turchin from the DOE’s Office of District Planning. An additional community meeting regarding this proposal was held at the Q147 building on March 31, 2014. At that meeting, interested parties had another opportunity to provide input on and ask questions about the proposal. Approximately 20-30 members of the public attended the meeting and 6 people spoke. Present at that meeting were: Anne Cohen, Principal of P.S./M.S. 147; and Deputy Chancellor Corinne Rello-Anselmi and Deputy Superintendent Barbara Joseph from the DOE. Additionally, a walkthrough of the Q147 building was conducted by Deputy Chancellor Corinne Rello-Anselmi from the DOE on March 31, 2014, just prior to the community meeting.

The following comments and remarks were made at the joint public hearing and community meeting on this proposal:

1. CEC 29 President Alicia Hyndman expressed support for the proposal stating that the CEC would like to see students with special needs served within the community.
2. P.S./M.S. 147 School Leadership Team representative Halima Hailey expressed concern about the supervision of District 75 students and the safety of the proposed co-location for students.
3. P.S./M.S. 147 School Leadership Team representative Kris Sieminski expressed the following concerns about the proposal:
  - a. He asked whether the New York Junior Tennis and Learning’s office in the building would be impacted.
  - b. He expressed concerns about safety asking if P.S./M.S. 147 could have two security guards and if P811Q would have its own security guards.
  - c. He asked whether the P811Q budget would be separate from the P.S./M.S. 147 budget.
  - d. He stated that P.S./M.S. 147 welcomes P811Q educators.
4. Multiple commenters expressed concern about safety in P.S./M.S. 147 and the safety of the proposed co-location for students.
5. Multiple commenters asked whether there would be money to renovate the Q147 auditorium and lunchroom.
6. Multiple commenters asked whether there are enough classrooms and offices for P.S./M.S. 147 and P811Q. A parent expressed concerns that there would not be space for P.S./M.S. 147 to continue to offer cluster classrooms.
7. A commenter expressed concerns that the cafeteria cannot accommodate two schools.
8. A commenter asked why space in P.S./M.S. 147 could not be used for more pre-kindergarten classes instead of P811Q.
9. A commenter expressed concerns that additional buses and crossing guards in the area would create more congestion.
10. A commenter asked whether P811Q would have its own staff and budget.
11. A commenter asked whether P811Q’s students and P.S./M.S. 147’s students would be separated.

12. A commenter asked if the P811Q would expand its enrollment if the proposal were approved.
13. A commenter asked if there are examples of successful District 75 co-locations in the City.
14. A commenter expressed concern that P.S./M.S. 147's fifth-grade students would share a floor with P.S./M.S. 147's middle school students if this proposal is approved.
15. A commenter asked about ways to educate the community about District 75.

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

The DOE received no written and/or oral comments through its dedicated phone line and e-mail for the proposal.

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

Comments 1 and 3d are in favor of the proposal and do not require a response.

Comments 2, 3b, and 4 concern the safety of the proposed co-location for students.

There are currently two school safety agents in the Q147 building. School Safety, in collaboration with the New York City Police Department, has requested an additional safety agent to be assigned to the mini-building Q851 to support the increased population at Q147 if this co-location proposal is approved.

Pursuant to Chancellor's Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. The School Safety Plan is updated annually by the Committee to meet changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

In addition, the DOE makes available the following supports to schools relating to safety and security:

- Providing "Best Practices Standards for Creating and Sustaining a Safe and Supportive School," as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and support to Children's First Network ("CFN") Safety Liaisons;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

The DOE is confident that the Principals in the Q147 building will create a collaborative and mutually respectful environment for all students, staff, and faculty members.

Comment 3a concerns the impact on the New York Junior Tennis and Learning office in the building.

As stated in the EIS for this proposal, this proposal is not expected to impact the continued siting of New York Junior Tennis and Learning or CEC 29's office in building Q147.

Comments 3c and 10 concern whether P811Q and P.S./M.S. 147 will share staff and budget.

During the community meeting on March 31, Deputy Superintendent Barbara Joseph explained that P.S./M.S. 147 and P811Q are two different organizations with two separate budgets.

Comment 5 concerns renovations to the Q147 building.

There is \$960,546 allocated in the FY 2015-2019 Capital Plan for an auditorium upgrades at Q147. At this time, there are no plans to renovate the Q147 cafeteria. The FY 2015-2019 Capital Plan is available on the New York City School Construction Authority Web site:

<http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Pages/CapitalPlan.aspx>.

Comment 6 concerns space in Q147.

We are a diverse school system of more than 1.1 million students across 1,800 schools. With many moving parts, our system has space needs that sometimes require adjustments.

As stated in the EIS, building Q147 has been identified as an under-utilized building and has space that could be used more efficiently to accommodate additional students. There is sufficient space in Q147 and its adjacent mini-building for P.S./M.S. 147 and P811Q@Q147. If this proposal is approved, there will be approximately 714-840 total students served in Q147 beginning in the 2014-2015 school year. The projected utilization rate for Q147 as a result of this proposal will be approximately 71% - 84% in 2014-2015, meaning that there is sufficient space to accommodate P811Q@Q147 in the building.

Projected enrollment figures and anticipated utilization rates for Q147 are based on target capacity data from the 2012-2013 Blue Book and enrollment data from the 2013-2014 Audited Register. This methodology is consistent with the manner in which the DOE conducts planning and calculates space allocations for all schools.

Further, if this proposal is approved, there will be sufficient instructional and administrative space in Q147 for P.S./M.S. 147 and P811Q@Q147 pursuant to the Citywide Instructional Footprint (the "Footprint"). Please visit the DOE Web site to access the Footprint, which guides space allocation and use in City schools: [http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011\\_FINAL.pdf](http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf). The Footprint sets forth the baseline number of rooms that should be allocated to a school based on the grade levels served by the school and number of classes per grade. For existing schools, the Footprint is applied to the current number of sections per grade, assuming class size will remain constant. The Borough Director of Space Planning then confirms both the baseline and current space allocation totals during a walkthrough of the building, where he/she is accompanied by a school's representative.

Currently in the 2013-2014 school year, P.S./M.S. 147 has a baseline footprint allocation of 27 full-size rooms, 7 half-size rooms, and 4.5 full-size equivalent ("FSE") rooms for administrative use. This includes space for cluster classrooms and administrative offices. Due to building configuration and a deficit of designed administrative rooms, P.S./M.S. 147's footprint has been adjusted to 30 full-size rooms, 6 half-size rooms, 4 quarter-size rooms, and 2.25 FSE of designed administrative space. This means that there are 16 full-size rooms, 1 half-size room, and 1 quarter-size room remaining in the Q147 building and its adjacent mini-building in excess above the footprint of P.S./M.S. 147.

To take a conservative approach for space planning purposes, the DOE has assumed that P811Q@Q147 will serve 36-72 students who will require 12:1:1 sections. Therefore, P811Q@Q147 has a baseline footprint allocation of 7 full-size rooms, 1 half-size room, and the equivalent of 1.5 FSE administrative spaces. Due to building configuration and a deficit of designed administrative rooms, the Footprint of P811Q@Q147 has been adjusted to 9 full-size rooms and 1 half-size room for instructional and administrative purposes. If P811Q@Q147 has a smaller adjusted footprint based on student classroom

assignments under their IEPs, any excess space will be allocated equitably between the schools by the Building Council.

As mentioned in the EIS, there will be excess space above each school's footprint if this proposal is approved. If this proposal is approved, the Office of Space Planning will work with the new Building Council to ensure an equitable allocation of the excess space. In determining an equitable allocation, the Office of Space Planning may consider factors such as the relative enrollments of the co-located schools, the instructional and programmatic needs of the co-located schools, and the physical location of the excess space within the building. In addition, the Office of Space Planning will work with the schools in building Q147 to ensure a smooth transition, if necessary, of any rooms currently being used above schools' footprint allocations.

As stated in the EIS, the proposed co-location of P811Q@Q147 is not expected to impact current student enrollment, or instructional programming at P.S./M.S. 147.

Comment 7 concerns the size of the Q147 cafeteria and whether it can accommodate two schools.

The cafeteria in Q147 has the capacity to serve 270 students. As stated in the EIS, specific decisions regarding the allocation of the shared spaces will be made by the Building Council, consisting of principals from both co-located schools, in conjunction with the DOE's Office of Space Planning. The DOE will work with leadership of both schools to ensure that all students have their breakfast and lunch needs met.

Comment 8 concerns the ability of P.S./M.S. 147 to add pre-kindergarten classes.

P.S./M.S. 147 currently offers one pre-kindergarten class and did not apply to expand its pre-kindergarten for the 2014-2015 school year.

This proposal is not expected to impact P.S./M.S. 147's ability to expand its pre-kindergarten program in future years if it opts to and is approved to do so. Should P.S./M.S. 147 be approved to expand their pre-kindergarten program, the DOE anticipates there will be sufficient space in building Q147 to accommodate P811Q@Q147 and additional pre-kindergarten sections. As with all pre-kindergarten programs, the availability of pre-kindergarten at P.S./M.S. 147 will be subject to available funding.

Comment 9 concerns congestion around the school.

If this proposal is approved, there will be two separate entry and egress points for each school in order to minimize congestion. School leaders will collaborate on an arrival and dismissal plan to meet the needs of both schools. While the DOE does not anticipate complications related to increased pedestrian or automobile traffic, the Office of Pupil Transportation can support the schools as needed.

Comment 11 concerns the separation of P811Q@Q147 students and P.S./M.S. 147 students in Q147.

In many buildings where schools are co-located, each school is assigned bathrooms on the floors or hallways of their classrooms and specific stairways for students to use. These measures are taken to cultivate cohesive cultures within each school. Separation between schools is intended to limit any issues that might arise from groups of students who may not know each other well and to nurture school unity.

If this proposal is approved, P811@Q147's classrooms and administrative space will likely be located in the mini-building adjacent to building Q147. It is the expectation that school leaders would collaborate on the appropriate and equitable use of shared space in the main building Q147 that will address the needs of both schools. If the assignment of shared spaces is not working or is inadequate, the Building Council can discuss an alternative arrangement.

With respect to inclusion academic programming, during the community meeting at Q147 on March 31, 2014, Deputy Chancellor Corinne Rello-Anselmi explained that many successful District 75 co-locations offer part-time inclusion opportunities and as many opportunities for social and academic inclusion as possible. If this proposal is approved, the DOE would encourage opportunities for the students of both schools to interact.

Comment 12 concerns the enrollment of P811Q@Q147 if this proposal is approved.

As stated in the EIS, if this proposal is approved, P811Q@Q147 will open in September 2014 serving six self-contained sections of students for a total of 36-72 students. If this proposal is approved, there will be approximately 714-840 total students served in Q147 beginning in the 2014-2015 school year. The projected utilization rate for Q147 as a result of this proposal will be approximately 71% - 84% in 2014-2015.

There are currently no other proposed uses or plans for building Q147 or plans to expand P811Q@Q147's enrollment beyond what is proposed. However, as with all schools throughout the city, if enrollment and demand for both P.S./M.S. 147 and/or P811Q@Q147 changes, any excess space will be allocated equitably between the schools by the Building Council. Similarly, as stated in the EIS, if P811Q@Q147 has a smaller adjusted footprint based on student classroom assignments under their IEPs, any excess space will be allocated equitably between the schools by the Building Council.

Comments 13 and 15 concern examples of successful District 75 co-locations and ways to learn more about District 75.

During the community meeting on March 31<sup>st</sup>, Deputy Superintendent Barbara Joseph stated that there are 59 District 75 schools that are co-located in over 350 sites across the city. The goal is to create a successful environment for all students in the building and develop relationships between school leaders. Some examples of successful co-locations where school leadership is collaborating based on a common vision and mission to improve outcomes for all students, strategic use of resources, and open lines of communication include P811Q@Q136, P811Q@QHST, and P233Q@Q686. Although P.S./M.S. 147 and P811Q are two different organizations with two separate budgets, the expectation is to develop relationships and a support system to create a successful co-location that serves the needs of all students.

With respect to education about District 75, Deputy Superintendent Barbara Joseph stated that if this proposal is approved, training sessions for staff and parent groups of the co-located schools will be planned over the summer. She encouraged the P.S./M.S. 147 community to facilitate this communication. Additionally, members of both the P811Q and P.S./M.S. 147 school leadership teams were present during the joint public hearing on April 9th. Following the hearing, the District 75 network leader spoke with the P.S./M.S. 147 school leadership team representatives and answered their questions. For more information about District 75, please refer to the DOE Web site:

<http://schools.nyc.gov/academics/specialEducation/D75/default.htm>.

Comment 14 expresses concern about fifth-grade students of P.S./M.S. 147 sharing a floor with P.S./M.S. 147 middle school students..

During the community meeting on March 31, 2014, Principal Anne Cohen of P.S./M.S. 147 stated that P.S./M.S. 147's fifth grade will share a floor with its middle school grades. However, if this proposal is approved, the Q147 Building Council consisting of principals from both co-located schools in conjunction with the DOE's Office of Space Planning, will determine the allocation of space in the building.

It is not unusual for varying grade levels to be in a building together, or to share a floor in a building. There are over 140 schools across the City serving students in Kindergarten through eighth grades, and approximately 10 additional schools serving students in grades kindergarten through twelve.

During the community meeting at Q147, Deputy Chancellor Corinne Rello-Anselmi added that P.S./M.S. 147 is a Positive Behavior Interventions and Supports school and will implement a behavior policy to ensure the safety of its students. The DOE is confident that P.S./M.S. 147 can create a safe and respectful environment for its students, staff, and faculty.

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

No changes have been made to the proposal.