



Public Comment Analysis

Date: December 13, 2010

Topic: The Proposed Grade Expansion of Urban Assembly Academy of Arts and Letters (13K492) to a K-8 School

Date of Panel Vote: December 14, 2010

Summary of Proposal

Urban Assembly Academy of Arts and Letters (13K492, or “Arts and Letters”) is an existing middle school located at 225 Adelphi Street, Brooklyn, NY, 11205, in Community School District 13. It currently serves students from Districts 13, 14, 15 and 16 in sixth through eighth grades. Arts and Letters is located in K020, where it is co-located with P.S. 20 Clinton Hill (13K020, or “P.S. 20”). P.S. 20 is an existing elementary school that currently serves students in Kindergarten through fifth grade and offers 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 October 29, 2010, the DOE issued an Educational Impact Statement (“EIS”) describing a proposal to implement a “grade expansion,” meaning that Arts and Letters would expand to serve Kindergarten through eighth grade by 2015-2016. Arts and Letters would be an “unzoned” District 13 elementary school, which means that it would admit Kindergarten students from throughout District 13. Future fifth graders enrolled at Arts and Letters would have priority admission to remain at Arts and Letters for sixth grade. Other fifth graders throughout District 13 would continue be able to apply to attend middle school at Arts and Letters if additional seats remain available. However, Arts and Letters would eventually stop participating in the middle school choice admissions processes for Districts 14, 15, and 16.

On November 22, 2010, the DOE posted a revised version of the proposal which altered the timeline for removing Arts and Letters from the District 14, 15, and 16 middle school choice processes. Under the original proposal Arts and Letters would have stopped participating in those middle school choice application processes for the 2016-17 school year. Under the revised proposal, Arts and Letters is to stop participating in those processes for the 2012-13 school year. The revised proposal also clarified Urban Assmby’s admissions process and corrected errors in the statistiel data contained in the original proposal.

Arts and Letters would begin the expansion by enrolling two sections each of Kindergarten and first grade in the 2011-2012 school year. Over a period of five years, additional grade levels would be added as these elementary students aged up and as new Kindergarteners enrolled. In order to ensure that there is adequate space for Arts and Letters's new elementary sections and P.S. 20, beginning in 2013-14 the incoming sixth grade enrollment at Arts and Letters would decrease from 4 sections to 2 sections. Expansion would be completed in 2015-2016, when the school would ultimately serve two sections in each grade level (K through 8), for a total of 18 sections.

The DOE received feedback from the community beginning in spring of 2010, when Arts and Letters first applied to expand its grade configuration. Feedback received prior to the formal comment period, which began on October 29, 2010 was received both in support and in opposition to the expansion plan, and the reasons cited were aligned with those received during the formal comment period and addressed below. At the time that the revised proposal was posted, the DOE posted a notice which contained a summary of all comments received to that date. Those comments are also addressed below

Summary of Comments Received at the Joint Public Hearing

On December 8, 2010, a joint public hearing regarding this proposal was held at the building shared by Arts and Letters and P.S. 20. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 200 members of the public attended the hearing, and 63 people spoke. Written questions were also submitted at the hearing, which were compiled and answered after public comment. Present at the meeting were Deputy Chancellor for Portfolio Planning Marc Sternberg, District 13 Superintendent James Machen; P.S. 20 PTA President Ayanna Blaize; Arts and Letters School Leadership Team member David Goldsmith; CCSE member Lori Podvesker; District 13 Community Education Council members Renée Holmes; Remarks were made by Margaret Kelley of the Brooklyn Borough President's Office, New York City Councilmember Letitia James, District Leader Lincoln Restler, and CEC 15 President Jim Devor.

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

1. CCSE member and public advocate appointee Laurie Podvesker stated that though the expansion of Arts and Letters would allow more students from the district to apply, it would decrease space for P.S. 20 to grow. She also expressed an opinion that the proposal highlights inequities in resources and support for all students in our public schools, including those with special needs, and may create divisions in the community.
2. Margaret Kelly stated that Brooklyn Borough President Marty Markowitz intends to have his representative to the Panel for Educational Policy introduce a resolution to postpone the vote on the proposal, to enable more time for public comment and discussion of the best solution. She encouraged those in attendance to email their PEP representatives to support the postponement of the vote.
3. Councilmember Letitia James stated that she supports the Borough President's resolution for a postponement of the PEP vote. She noted that she is disappointed in the public response to the proposal, and asked community members to behave in a professional manner despite disagreement. She stated that District 13 needs options, that competition is good, that Arts and Letters is a high performing school, and that she supports the

expansion of Arts and Letters. She also stated that the DOE should consider moving Arts and Letters to a new building, consider expanding P.S. 20, make the principal of P.S. 20 permanent.

4. District Leader Lincoln Restler stated that he supports the proposal of the Borough President to postpone the decision. He also stated that P.S. 20 should be given the opportunity to expand and that the principal of P.S. 20 should be made permanent. He expressed a concern that expanding Arts and Letters within the existing building would result in overcrowding and reduce middle school seats in the district.
5. CEC 13 President Renee Holmes stated that she does not support the proposal to expand Arts and Letters because there is not enough space inside the building. She noted that it is a priority to maintain quality middle schools, and suggested that Arts and Letters should remain a middle school. She stated that if the proposal is approved, seats in the school should be open only to District 13 students. She also mentioned the importance of small classroom sizes, and of addressing the needs of students with disabilities in proposals for changes in school utilization.
6. CEC 15 President Jim Devor stated that District 15 students currently have access to Arts and Letters but would not if the proposal is approved, and that he supports the resolution by the Borough President's designee to postpone the PEP vote on this proposal. He introduced a proposal to move Arts and Letters to the a larger space new building being constructed near P.S. 133 when the building is ready in 2013, and that Arts and Letters continue to accept District 15 students.
7. P.S. 20 SLT member Ayanna Blaize stated that she does not support the proposal to bring in another school to the building and expressed her concern that the process was not transparent. She also stated that the two schools that are already in the building could work together as an inclusive community and noted that P.S. 20 is working with Pratt and other companies to implement more enriching programs for the students.
8. Arts and Letters SLT member David Goldsmith stated that he supports the proposal to expand Arts and Letters because of the importance of forming an actively engaged learning community. He commented that the period spent at the school was too short and thus, interfered with continuity for students and parents alike. He also expressed his concern that the process of inclusive discussion with members of P.S. 20 and Arts and Letters parents' community has not been transparent and urged the DOE to organize platforms to share ideas and concerns.
9. Arts and Letters Principal Allison Gaines-Pell stated her support for the proposal to expand Arts and Letters. She stressed that the expansion would bring about vibrant options, shared resources, stronger community and better education for the District 13 students.
10. Arts and Letters PTA Co-President Nadine Jervis stated her support for the proposal, having experienced a similar situation at P.S. 261. She stressed that the students need more time at schools and urged the parents to work together to bring about the change.

General Data:

11. A commenter expressed the concern that the new school would be given unfair structural advantages, such as extra funding for new equipment and facilities that the P.S. 20 students will not have access to.

12. A commenter stated that P.S. 20 had to endure budget cuts that impeded growth. The extra funding that would be spent on Arts and Letters expansion could instead be used to help P.S. 20 implement more programs.
13. A commenter expressed the opinion that P.S. 20 needs better resources such as more staff including a gym teacher, and a permanent principal.
14. A commenter stated that there were factual errors in the EIS.
15. A commenter expressed the opinion that the process was rushed and not transparent. Some parents do not even know about the proposal.

Enrollment:

16. A commenter stated that there could be different numbers of students per class in each school.
17. A commenter noted that if the classrooms at P.S. 20 could be capped at 25, there would not be extra rooms for the expansion of Arts and Letters.

Impact on neighboring schools

18. A commenter expressed the opinion that the proposal would result in the loss of seats at a good middle school, and lowered the chance for P.S. 20/P.S. 8 students to get into Arts and Letters.
19. A commenter expressed concern about the potential overcrowding as a result of co-location.
20. A commenter expressed the opinion that District 13 does not need another elementary school, but rather needs more high-performing middle school options.
21. A commenter expressed concern that the expansion would negatively impact the students of P.S. 8 and their choice for middle schools.
22. A commenter expressed the opinion that the kindergarten and first grade program at P.S. 20 would be negatively affected by the expansion. The only reason why UAAL is outperforming other schools is due to having more resources.
23. A commenter expressed concern that P.S. 20 students will not benefit from the expansion and feel neglected.
24. A commenter expressed concern that students will treat each other differently if they think the other school is “wrecking” theirs.
25. A commenter expressed the opinion that the proposed expansion would adversely impact the quality of education at P.S. 20, citing the potential loss of staff as a result.
26. A commenter expressed the opinion that staggered lunch periods would cause undesired results (i.e., students will have to eat lunch very early or very late in the day)
27. A commenter stated that the DOE should search for another space/building for Arts and Letters if it wants to expand.
28. Approximately 22 commenters expressed support for the proposal. The reasons cited were:
 - a. Increased elementary school options for students/parents.
 - b. Higher development and better educational structure for the students.
 - c. A recent survey, which contained there were 393 signatures in favor of the expansion while the opposition only had 81.
 - d. District 13 needs more high-performing schools like Arts and Letters.

- e. The solution for recent complaints is not to change the proposal, which is the right step, but rather to come up with other proposals.
- f. After doing research, a commenter found out that the expansion would not compromise the future of P.S. 20 since it has a high proportion of underutilized rooms (in comparison to neighboring schools), which should be allocated for other use.
- g. Arts and Letters has excellent special education programs such as supervised playground and is helping kids with IEPs. There should be range of options for range of students.
- h. The expansion would strengthen the schools in District 13 and hence, encourage more students to remain in the district, and not to be sent outside the zoned area.
- i. Arts and Letters provides excellent education and it makes sense to replicate a working model.
- j. The proposal would allow for increased time for schools to develop strong bonds with the students and their families, allowing for continuity.
- k. The expansion would create competitive environments for students that would prepare them for the increasingly competitive world.
- l. The expansion would better support minority groups.
- m. Arts and Letters should become a District 13-only school when it reduces its middle school sections from four to two.

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

29. Approximately 11 commenters expressed opposition to the proposal. The reasons and opinions put forth were:
- a. The loss of middle school seats in District 13;
 - b. The loss of middle school seats for students in Districts 14, 15 and 16;
 - c. The overall loss of 150 middle school seats when there are a low number of high quality middle school seats throughout the City;
 - d. The downsizing of the middle school at Arts and Letters, which the commenter believed would result in loss of electives.
 - e. The opinion that P.S. 20 is headed in the right direction under its new Interim Acting Principal, Lena Barbera, and will offer a similar educational experience to that envisioned at Arts and Letters, but it will be available to all students in the zone, not just those who win the lottery.
 - f. The need for P.S. 20 to enroll more students to get the funding to support current programs and hire a gym teacher. The proposal would divert students away from P.S. 20 and hinder enrollment growth.
 - g. The concern that P.S. 20 would lose rooms needed to support special programs; in particular, it would jeopardize P.S. 20's collaboration with Pratt Institute on Pratt Studio@P.S. 20 and the incipient Artist-in-Residency program. Plans to convert a classroom into a professional art studio would be threatene
 - h. The potential overcrowding as a result of co-location.
 - i. The concern that the Arts and Letters school would be allowed to cap class size at 25 students per class, while class sizes in many grades are already far above that

at P.S. 20, and are likely to rise even higher as enrollment continues to increase, as it has throughout the Borough in recent years.

- j. The idea that District 13 already enjoys a significant amount of choice and options. The district has 10% of its students in lottery-based schools as opposed to the national average of 2%. There is a need to focus on neighborhood schools that have no lottery system.
 - k. The fact that enrollment in District 13 is not increasing, therefore, there is no need to add capacity. The focus should be improving what currently exists.
 - l. The potential unfairness of Arts and Letters having small class sizes, a gym teacher, and long-term foundation support, while P.S. 20 will not.
 - m. The EIS's statement that the schools will share services for disabled students, but the facilities assessment doesn't address whether there is room for expansion of this population.
 - n. The potential for the expansion to endanger programs that serve disabled students, who are served in far greater numbers by P.S. 20 than by Arts and Letters.
 - o. The facilities assessment, which a commenter believed was rushed and incomplete, and does not address shared space issues.
 - p. The fact that the school has not yet resolved the issue of Health Department regulations for bathrooms for Pre-Kindergarten and Kindergarten students; this should be done before moving forward.
 - q. The possibility that the expansion could lead to building code violations. The DOE instructional footprint now defines a full -size classroom at 500 sq. feet or more. According to the building code, at least 20 sq. ft. per student in grades 1-8 is necessary; 25 for Kindergarten. This means that if 1st-8th grade students are forced into rooms of 500 sq. feet, class sizes cannot rise above 25 without violating the code. Special education space requirements are even more stringent.
 - r. The fact that P.S. 20 already has a waiting list for pre-K, and losing more space may put at risk this important program, just as demand is also increasing fast throughout borough for preK seats.
 - s. Planning for this proposal has not included the P.S. 20 community.
 - t. The expansion of Arts and Letters would inhibit the ability of P.S. 20 to continue improving and attracting neighborhood students, resulting in different racial and economic backgrounds being represented in the two schools and exacerbating tensions in the community.
 - u. Some P.S. 20 Kindergarten students eat lunch at 10:30am. If the proposal is approved, there could be students who are forced to have lunch even earlier
 - v. According to a wall poster, P.S. 20 is now the site of the "School of One." According to the EIS, the school will have to share the computer lab with Arts and Letters. How will that affect this program?
30. Approximately 17 commenters expressed support for the proposal. The reasons cited were:
- a. The need for choice and more and better options,
 - b. The school's philosophy and approach is a different and attractive option for many families in the neighborhood;

- c. Schools that have proven successful like Arts and Letters should be supported and given the opportunity to serve more students;
 - d. Arts and Letters has a progressive educational philosophy and emphasizes the arts;
 - e. All of the students in District 13 deserve equal access to a high-quality school like Arts and Letters starting from Kindergarten;
 - f. There is clear demand for new options in District 13, as evidenced by the 700-student waiting list at the Community Roots Charter School and multiple new, progressive private schools opening in the area;
 - g. Arts and Letters would provide not only an excellent education, but continuity through elementary and middle school within the neighborhood;
 - h. There is a belief that both Arts and Letters would be successful schools and would be a model for collaboration;
 - i. Arts and Letters has strong leadership and encourages parent and community involvement;
 - j. Extending the excellent education available at Arts and Letters to younger children would provide an opportunity to spend more time nurturing and enriching students and would strengthen the community;
 - k. Families who currently send their children out of district for school would not do so if the option to enroll at Arts and Letters were available to them;
 - l. Education is not one-size-fits-all, and providing a variety of options is best for the community and for public education in general;
 - m. The school's programs and philosophies are effective and appreciated by current parents;
 - n. Parents need to work together to support Arts and Letters and P.S. 20 to ensure that the vision of two successful schools is realized; the expansion itself need not have any negative impact;
 - o. The principals of Arts and Letters and P.S. 20 have worked well together and have raised funds together to improve facilities; they can continue to collaborate on shared space and parent concerns;
 - p. A group of parents conducted a survey in the Clinton Hill neighborhood, and reported that they found that 79% of respondents were highly dissatisfied with public elementary options and 75% would be very likely to send their children to elementary school at Arts and Letters if that were an option;
 - q. To keep the neighborhood growing and to make it friendly for families, more options must be provided;
 - r. The impact on District 13 middle school seats will be minimal;
31. In addition, approximately 40 comments were received urging the Panel for Educational Policy to not delay the vote on this proposal, as suggested by Margaret Kelley of the Brooklyn Borough President's Office and City Councilmember Letitia James at the joint public hearing. All of these comments urged the approval of the proposal as well as a timely vote. The reasons cited were:
- a. Commenters indicated that a postponement of this vote will delay the process in enrolling kindergarten students since recruiting begins in January. Also, delaying the vote will deepen the divide between the two school communities currently co-

located in the same building (K492 and K020). Both schools require time to work effectively together. This school requires time to implement proposal and delaying the vote will only result in less time available for the school to do so. Voting down this proposal would result in a request for more equitable division of space, which currently favors P.S. 20.

- b. Commenters stated that delaying the vote would delay their ability to begin planning and implementing this proposal. Postponing the vote will delay recruitment, hiring, curriculum planning as well as all critical steps involved
 - c. Commenters stated that the postponement of the vote will result in more parents deciding to send their children elsewhere outside of District 13. Commenters are requesting that the Panel act now to move this proposal forward so that parents in District 13 will have more options and keep their children within the district.
 - d. Commenters requested that the vote not be postponed to allow District 13 better elementary options which it is in dire need of. Innovation in District 13 has been delayed for years and the community wants to see it grow. District 13 needs more elementary school options.
 - e. Commenters expressed that the opposition towards this expansion is not the entire community but a much smaller population. The proposal has been discussed with the community and that multiple meetings have been held over the past 9 months. Also, it has been noted in multiple comments that there is sufficient space available in building K020 to meet this expansion.
 - f. Commenters believe the request to postpone the vote is a stall tactic.
 - g. Commenters sought to dispel many myths regarding the expansion of Arts and Letters and made the following points:
 - h. Commenters stated that finding a space solution will take months to advance and will delay the creation of the kindergarten and first grades scheduled for the fall of 2011.
 - i. One commenter stated that P.S. 20 has had more than enough time to consider the proposal and that District 13 parents need more elementary school options.
32. One commenter urged the Panel for Educational Policy to delay the vote in order to ensure that the process is conducted in the most transparent, democratic way.

The following questions were submitted at the joint public hearing. Questions are presented verbatim:

General Data:

1. What is the total student capacity in the P.S. 20 building?
2. What percentage of P.S. 20 students come from District 13?
3. What locations are being considered for Arts and Letters?
4. Has the DOE made an effort to find a suitable building other than 225 Adelphi for Arts and Letters?
5. Will the vote happen at the January meeting?
6. What is the deadline to know if Arts and Letters Kindergarten and 1st grade will happen for Fall 2011? (If it doesn't happen at P.S. 20).

Enrollment:

7. With so much talent in this city, why are so many children being left behind? Coming from P.S. 8, I need to know – can you or anyone in this city guarantee that my daughter gets into a decent school? This next part of the question desperately needs to really be answered: If not, why not?
8. Will DOE support the community in developing more middle school choice and how?
9. Under current kindergarten application and admissions processes, students may apply to any school in the district (or city). Students often attend schools outside their zone (not lottery schools) – Do you know how many students in District 13 attend schools outside their zone? Or at P.S. 20?
10. If this progress goes through what will it mean for sibling attendee P.S. 11?
11. How will you decide to choose he/she over another child in UAAAL extend K-8 for 6th grade?
12. How will applications be handled for Arts and Letters' proposed elementary school? This seems very vague in the proposal? A lottery?
13. What consultations, if any, was done with the CEC for District 15 whose parents will be deprived of future access to Arts and Letters?

Impact on neighboring schools:

14. P.S. 20 does Pre-K very well. We have a waiting list for Pre-K. Will P.S. 20 be able to add a second Pre-k section after the A+L expansion?
15. Is it the sole mission to close P.S. 20 under the pretense of expanding Arts and Letters?
16. Is there a way where P.S. 20 and Arts and Letters to share resources and, will there be more resources if they share a school?
17. In the case that the expanded school interferes with the progress of P.S. 20, what steps will the DOE take to rectify the situation for P.S. 20?
18. There is an impact on P.S. 8. This year, P.S. 8 students enrolled in A & L. Proposed Dock Street is 4 to 6 years out, if happens at all. Can you open a new middle school for P.S. 8 now, if not what are your plans for the impact on P.S. 8 community?
19. What, if any, direct impact would the expansion of Arts and Letters into elementary grades have on the educational opportunity that P.S. 20 is able to offer its students? To what extent does the impact on P.S. 20 result from collocation?

Leadership:

20. How will Allison lend her leadership role to the proposed elementary school, taking into consideration that she is the principal of Arts and Letters Middle School?
21. Does Allison Pell have any early childhood experience?
22. You mentioned District 13 would gain another successful elementary program, how do we know that when they have only operated as a middle school?
23. A & L is a good middle school. How do we know if will be a good elementary school?
24. How can Arts and Letters be effective when they have a C- in student performance and student progress?

Diversity:

25. Is the issue around choice that P.S. 20 isn't white enough with the new neighborhood?

26. What is the SPECIFIC plan for how A & L will create a student body as diverse as that in most public schools as opposed to most lottery school?

Quality of the schools:

27. How does A & L expand AND keep the middle school numbers intact?
28. Does the “A” rating received last two years ago count for anything?

Special Education:

29. How can they blanketly use the scores when they are not comparing all the schools in District 13 with some having more special needs students than others?
30. It would be helpful if Arts and Letters leadership could address the concerns regarding special ed inclusion.

Other Questions:

31. What will happen to Arts and Letters if District 13 decided to become unzone throughout?
32. “Fast track”- who decided to fast track?
33. What is Fast-tracking and who pushed for this if what I’m hearing is accurate?
34. Why can’t the expansion be delayed by just one year?

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

With regard to comments 1, 4, 5, 19, 29e, 29g, 29i and 29j, according to the building survey conducted on October 13, 2010, building K020 has sufficient rooms for each school’s basic needs with 3.5 Full-Size Equivalent rooms available to be allocated equitably between the schools. Though more students would occupy K020 as a result of this proposal, there would continue to be sufficient space to serve students in K020 pursuant to the Instructional Footprint after the grade expansion is completed. In addition, currently, more than 50% of the current student enrollment at P.S. 20 is comprised of un-zoned students. This means that as many as 50% of seats were still available for P.S. 20 zone students to have enrolled in P.S. 20 this year had they wished to attend the school.

With regard to comments 2, 3, 4, 6, 31a-31i and questions 5 and 34, the DOE believes that the expansion of Arts and Letters should not be delayed. This proposal is scheduled to be voted on by the Panel for Educational Policy on December 14, 2010. The Kindergarten registration period for 2010-2011 begins on January 10, 2011. To delay the vote to a later Panel for Educational Policy meeting would prevent an expanded Arts and Letters from participating in that Kindergarten registration period from the beginning. As set forth in the EIS, the DOE believes that it is important to introduce a new high quality district choice into the elementary grades where comparatively fewer district choice options currently exist outside of zoned schools or charter schools (compared to the full middle school choice and full high school choice processes) should not be delayed.

With regard to comments 3, 6, 27 and questions 3 and 4, all buildings and options were explored in the DOE’s planning process. When looking to increase choices and options for parents the

DOE first looks at how to utilize the existing space within the district. Currently, seven buildings are listed as being underutilized on the 2010-2011 Under-Utilized Space Memorandum and List, which can be accessed on the DOE's website at: <http://schools.nyc.gov/community/planning>. A building is considered under-utilized if it has at least 300 seats currently available according to the 2009-2010 Blue Book. It was determined that the P.S. 20 building has the available space to accommodate both schools after the proposed expansion and accommodate growth. Given that they have shared space since 2006, the decision was made to keep the schools in their current location.

The DOE decided not proceed with the proposal to relocate Arts and Letters to the K133 building, a new construction scheduled for completion in 2012, for the following reasons:

1. The new K133 building must house the existing P.S. 133 (which must move from its current leased space in 2012). Under this alternative proposal Arts and Letters would continue to be co-located with a District 13 elementary school in a building of approximately the same capacity as the K020 building. The new K133 building will have the capacity to serve a total of 935 students, however, 60 of these seats will be designated to District 75, which leaves a total of 875 seats. The K020 building has the capacity to serve 897 students.
2. The new K133 building is being constructed to improve the conditions at the former P.S. 133 building and to add approximately 600 elementary school seats to District 15 to address elementary school overcrowding. If Arts and Letters were to move to the K133 building, the majority of seats at Arts and Letters would have to be allocated to District 15 to ensure that the issue of overcrowding is addressed. This alternative proposal does not address the need to expand the number of high quality elementary school options for District 13 families.
3. The current proposal for the K133 building when construction is completed in 2012 is to expand enrollment at the existing P.S. 133 to include students from District 13 and District 15. The DOE anticipates creating a zone for the school to ensure that students from the overcrowded schools in District 15 can be accommodated in their zoned school if they choose to attend.

With regard to comments 4, 5, 18, 20, 21, and 29a-29c and questions 7, 8, and 18, concerning availability of middle school seats in District 13, compared to the range of choices available in the District 13 Middle School Choice process and the Citywide High School Application process, there are relatively few elementary school options beyond zoned elementary schools in District 13. Every student has a right to select the educational option he or she feels is right for him or her.

While the DOE acknowledges that the decrease in middle school seats at Arts and Letters would result in the loss of 150 sixth through eighth grade seats at Arts and Letters, it believes that would be outweighed by the addition of 300 high quality elementary seats. By extending an additional high quality choice into the elementary grades where comparatively fewer district choice options exist outside of zoned schools or charter schools, the array of parent choices would be expanded. Furthermore, Arts and Letters would have 50 available sixth-grade seats for District 13 students beginning in 2013-14. Given that there are currently 68 sixth graders from

District 13 enrolled at Arts and Letters, the decrease in middle school seats available to District 13 students would be minimal.

The DOE continues working toward strengthening middle school options. Fort Greene Prep Academy is a new middle school that opened in District 13 in September 2009. Also, Community Partnership Charter School was expanded to serve middle school grades this year, and Achievement First Endeavor Charter School serves grades 5-8 and is located District 13. Additionally, Community Roots Charter School has also applied to expand to serve middle school grades in September 2011. (The charter expansion hearing is currently scheduled for December 16).

District 14, 15, and 16 students who may have chosen to attend Arts and Letters would continue to be able to choose from other high-quality middle school options in their home districts as listed in their respective middle school directories.

With regard to comments 7, 8, 15, 29s, and 30g, the DOE worked with the District 13 CEC, Superintendent and District Family Advocate, in addition to the principals and network leaders of both organizations in communicating this idea both before it became a formal proposal and after the expansion application was submitted last spring. We have received feedback since that time, and postponed the hearing date (several times) in order to get additional feedback.

Additionally, the DOE sought community feedback before, during and after the proposal process through meetings with the P.S. 20 and Arts and Letters SLTs, parents mtg, relevant CECs meetings, Town Halls, Joint Public Hearings, as well as dedicated email/website/phone. The DOE also provided notice to parents and community members in the form of multiple notices and/or letters to parents.

The remainder of comments 8, and comments 9, 10, 28a-28m, and 30a-30r express support and do not require a response.

With regard to comments 11, 12, 13 22, 25, and 29l, while Arts and Letters would receive a one-time award of approximately \$4,000 during the first year of the grade expansion to help offset the costs of materials, such as new furniture and supplies that are needed to support the additional grades, the cost of the annual replacement of furniture and other materials needed at the school will be funded out of the school's general supply budget, as is the case with all schools citywide, including P.S. 20.

Fair Student Funding (FSF) dollars – approximately \$4.5 billion in the 2009-10 school year – are used by all schools to cover basic instructional needs and are allocated to each school based on the number and need-level of students enrolled at that school. All money allocated through FSF can be used at the principals' discretion, such as hiring staff, purchasing 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.

With regard to comments 14, The Educational Impact Statement was revised on November 22, 2010, to correct factual errors.

With regard to comments 16, 17, and 29i, while class size is determined by a number of factors including school budgets, programming, and instructional need, the proposed expansion of Arts and Letters would not require either school to increase class size. Beginning in 2013-2014, Arts and Letters would reduce its incoming sixth grade class down to two sections, as they continue to accept two sections of Kindergarten. The DOE projects that, in subsequent years, Arts and Letters would reduce its middle school enrollment by approximately 40-50 students, which would allow Arts and Letters to continue expanding at K020.

With regard to comments 22, 23, 24, 29d, 29h, and 29u and question 19, P.S. 20 and Arts and Letters have shared their current location for the past four years and have demonstrated the ability to create a successful collaboration. The sharing of resources is a decision ultimately made by the principals of the two school organizations. This proposal is not expected to adversely affect current or future programs at P.S. 20. Current programs such as the French class, Pratt Art initiative, and Band program would continue to be provided to students. Future programs such as the science program and Farm project would also continue to be supported. The continued collaboration between the two organizations would support both schools and benefit the broader District 13 community. For example, joint fundraising efforts have resulted in enhancements to the existing shared spaces, such as the auditorium, a community garden and the school yard for use as a community plaza.

With regard to comment 26 and 29u, scheduling is up to the principals, the building council, and the respective School Leadership Teams. Given that cafeteria has the capacity to serve 228 students at one time, there is sufficient capacity to accommodate the 150 additional students as a result of the proposed grade expansion. For example, one possible scenario could be to offer lunch periods at 11:00, 11:45, 12:30, and 1:15. This will require continued collaboration between the principals of the two schools and the building council. Again, final decisions around lunch time scheduling and shared spaces would be decided by the principals.

NO RESPONSE FOR 29F. CITE BACK TO FUNDING RESPONSE.

With regard to comment 29g, the DOE does not anticipate that the listed programs would be affected by the proposed expansion. Based on the Footprint, there would be available space in the building after the proposed expansion.

With regard to comments 29j, and 29k, every student has a right to select the educational option they feel is right for them – whether it is the neighborhood zone school serving K-5 grades or a district choice school serving grades K-5 or K-8, or a charter school (or private school). We work to ensure that there is a diverse range of options available for families.

With regard to 29m, The DOE does not anticipate that the proposed grade expansion would impact students with disabilities or English language learners (ELLs). Arts and Letters would continue to meet the needs of its students with disabilities and ELL students in all grades. As the school grows to serve younger students, students in Kindergarten through fifth grade with

Individual Education Plans (IEP) or requiring ELL services would also be appropriately served by the school.

With regard to comment 29o, P.S. 20 and Arts and Letters have shared their current location for the past four years and have demonstrated the ability to coordinate and manage space sharing details to create a successful collaboration. The principals of P.S. 20 and Arts and Letters have expressed their willingness to discuss the specific details of the proposed space-sharing if the Panel for Educational Policy approves the proposal during its December 14, 2010, hearing. If the proposal is approved, the principals would have 6-8 months of planning and opportunities for their respective School Leadership Teams and Parent Teacher Associations to be included in that planning. Decisions about specific space sharing and building organization can vary widely, and all Principals who share buildings make these decisions. This work may be supported by their networks, the School Construction Authority, and DOE Central administration where necessary or applicable.

With regard to comment 29p, the need for dedicated toilets for Kindergarten and first grade students, per Department of Health requirements, is being investigated by the School Construction Authority .

With regard to comment 29q, as noted in the EIS, if the grade expansion were approved there would be still more 3.5 rooms in the building than the combined baseline room allocations for the two schools under the DOE Citywide Instructional Footprint. These rooms would be allocated between the schools in a way that took into account enrollment issues, including class sizes where appropriate.

With regard to comment 29r and question 14, pre-Kindergarten programs are based on a separate funding allocation.

With regard to comment 29v, this is incorrect. The School of One program is hosted currently only in three schools. M.S. 131 (02M131), I.S. 339 (09X339), and I.S. 228 (21K228).

With regard to question 1, building K020's target capacity is 897, according to the 2009-2010 Enrollment-Capacity-Utilization Report (The Blue Book). (include footnote from the updated fact sheet)

With regard to question 2, approximately 73% of P.S. 20's students reside in District 13. Approximately 46% of P.S. 20's students are zoned to P.S. 20. The remaining approximate 56% of P.S. 20's students, who are not zoned to P.S. 20, reside in other District 13 elementary schools' zones, including P.S. 3, P.S. 9, P.S. 11, P.S. 44, P.S. 46, P.S. 54, P.S. 56, P.S. 67, P.S. 256, P.S. 270, P.S. 287, and P.S. 305. The other students reside in other districts throughout the City.

With regard to question 6, Citywide kindergarten registration begins on January 10.

With regard to question 9, 56% of District 13 elementary students (in grades K-5) attend schools outside of their zone.

With regard to question 10, sibling enrollment policy as outlined in Chancellor's Regulation A-101 would remain unchanged. In short, in a K-5, K-6, K-7, or K-8 elementary school, a younger sibling can be granted sibling priority only if the older child is enrolled in a grade five or below at that school at the start of the following school year in September. Chancellor's Regulation A-101 can be viewed in full on the DOE's website at <http://schools.nyc.gov/RulesPolicies/ChancellorsRegulations>.

With regard to question 11, currently, Arts and Letters admits incoming sixth graders through the District 13, 14, 15, and 16 middle schools admissions processes. This means that sixth grade students are matched to the school through a centralized application process. Sixth grade admissions at Arts and Letters would remain the same for the next two years. In 2013-14, the admissions would be open to the District 13 middle school application process only. When Arts and Letters has grown to serve a fifth grade class (in 2013-14), the sixth grade seats will be filled primarily by the previous year's fifth grade students.

With regard to question 12, elementary schools are utilizing a centralized system to register incoming Kindergarten students (the Student Enrollment Management System, or "SEMS") in the order of appearance. SEMS will record student's date of birth, address, parent/guardian information, and record the status of registration (i.e. offered a seat, waitlisted, accepted offer or declined offer).

With regard to question 13, the Educational Impact Statement describes the impact on the middle school students in Districts 14, 15, and 16. Given that Arts and Letters is a District 13 school, the primary point of consultation in regard to this proposal was with the District 13 CEC, Superintendent, and community.

With regard to question 15, the building is able to accommodate the expansion and there will be sufficient space for P.S. 20 to grow. There are no plans to close P.S. 20.

With regard to question 16, this is a decision ultimately made by the principals of the two school organizations.

With regard to question 17, if both schools grow and flourish as planned and if the building can no longer accommodate both organizations, then appropriate steps will be taken to re-site the schools or perhaps split-site Arts and Letters. Available space in the district would be investigated, as would all available options.

With regard to questions 20-24, Principal Gaines-Pell has demonstrated that she has the capacity to serve her students and community well. Her leadership and management of Arts and Letters has resulted in a high performing middle school where, in 2008-2009, 81% of students were proficient in ELA and 77% in math, and where, in 2009-2010, 48% of students were proficient in math and 49% of students were proficient in ELA, comparatively higher than other District 13 schools. Principal Gaines-Pell was previously an elementary grade teacher and is certified as both an Elementary and Middle School principal.

The Progress Report grades are based on three elements, one of which is Student Progress. For elementary and middle schools, student progress measures average student improvement from last year to this year on the New York State tests in English Language Arts and Mathematics. In 2009-2010, Arts and Letters indeed scored a C grade in the student performance and student progress sub-sections. It should be noted, however, that performance grades for elementary, middle, and K-8 schools were depressed this year as a result of the State's decision to change cut scores on the grade 3-8 ELA and math tests. Only 25% of schools received an A or a B on the Performance section this year, and 35% of schools received Cs.

In Student Progress, Arts and Letters received a C, but it was right under the threshold for a B – the school's score was 24.7 and the cutoff for a B was 25.5.

Additionally, Arts and Letters earned a B in the Environment section, and earned additional credit for the performance of its Collaborative Team Teaching and Special Education Teacher Support Services students.

The DOE believes that she will be able to expand her school successful and provide the district with another high quality district elementary choice option.

With regard to question 25, 26, 29, and 30 and comment 29n, assertions that Arts and Letters serves a different demographic and excludes special education students are incorrect. In fact, approximately 13% of students served by Arts and Letters are special education students, while 6% of students in P.S. 20 require those same services. Arts and Letters and P.S. 20 serve approximately equal proportions of students eligible for free or reduced lunch and of each of the major races/ethnicities, with 89% of each school being Black or Hispanic. Based on the current enrollment at both schools, the data trends show that the expected enrollment at Arts and Letters would continue to remain as diverse as it is now.

(specific breakdown – below)

- i. Arts and Letters = 13% SE; P.S. 20 = 6% SE
- ii. Arts and Letter = 64% free/reduced meals; P.S. 20 = 66% free/reduced meals
- iii. Arts and Letters = 74% Black, 8% White, 15% Hispanic, 2% Asian, 1% American Indian;
- iv. P.S. 20 = 73% Black, 7% White, 16% Hispanic, 2% Asian, and 2% American Indian

With regard to question 27, beginning in 2013-14, the incoming sixth grade enrollment would decrease to 2 sections. If the proposal is approved, Arts and Letters would be an “unzoned” elementary school, which means that it would admit Kindergarten students from District 13. Future rising fifth graders at Arts and Letters would have priority admission to remain at Urban Assembly Academy of Arts and Letters for sixth grade if the proposal is approved. Other fifth graders throughout District 13 would continue be able to apply to attend middle school at Arts and Letters if additional seats remain available. Arts and Letters would no longer participate in the middle school processes for Districts 14, 15, and 16.

With regard to question 28, P.S. 20 received an overall A grade on the 2008-2009 Progress Report and an overall C grade on 2009-2010 Progress Report. The A grade is indicative of P.S. 20's positive performance that year, but it was not considered to this proposal.

With regard to question 29 and 30, Approximately 13% of students served by Arts and Letters are special education students, while 6% of students in P.S. 20 require those same services. All students will continue to receive the services they require per their Individual Education Plans.

With regard to question 31, if District 13 would like to unzone all elementary schools, this is something that the DOE can explore with the the District 13 Superintendent and District 13 CEC, along with the school leadership and communities.

With regard to questions 32 and 33, any references to “fast tracking,” or expediting the grade reconfiguration application process or giving it special preference to advance in the process, are incorrect. The grade reconfiguration application process began last Spring, and this application was in fact delayed in order to ensure that the application was reviewed thoroughly and receive additional feedback from the community.

Changes Made to the Proposal

No changes in the proposal were made in response to public feedback received following the posting of the revised proposal. The DOE did incorporate some feedback regarding a perceived lack of clarity in portions of the original proposal before issuing the revised proposal.