



Public Comment Analysis

Date: December 13, 2010

Topic: The Proposed Grade Truncation of P.S. 139 Rego Park (28Q139) and D75 School P177Q @ Q139 to K-5 Schools

Date of Panel Vote: December 14, 2010

Summary of Proposal

P.S. 139 Rego Park (28Q139, “P.S. 139”) is an existing elementary school located at 93-06 63rd Drive, Rego Park, NY 11374, in Community School District 28. It currently serves students in Kindergarten through sixth grade. P.S. 139 is co-located in Building Q139 with a District 75 (“D75”) inclusion school, P177Q (“P177Q@Q139”), which serves students in grades Kindergarten through sixth with a range of disabilities. “Co-located” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias. P177Q@Q139 students are enrolled in P.S. 139’s general education classes, and, depending on their individual needs, receive Special Education Teacher Support Services (“SETSS”) separately.

This is a proposal to implement a “grade truncation,” meaning that P.S. 139 and P177Q@Q139 would no longer enroll sixth graders after the current 2010-2011 school year.

During the 2010-2011 school year, all fifth and sixth grade P.S. 139 students would participate in the Middle School Choice process, and all fifth and sixth grade P177Q@Q139 students will participate in the D75 Middle School Choice process. At the close of the 2010-2011 school year, all fifth and sixth graders who meet promotional standards would graduate from P.S. 139 and P177Q@Q139. Beginning in 2011-2012, P.S. 139 and P177Q@Q139 would serve students only in Kindergarten through fifth grade. From that time forward, P.S. 139 and P177Q@Q139 students would move on to middle school for sixth grade.

Middle schools typically enroll students beginning in sixth grade, and P.S. 139 and P177Q@Q139 students have the option to apply to start middle school as sixth graders. P.S. 139 and P177Q@Q139 students who wait until sixth grade to apply to middle school are limited to those schools that still have available seventh-grade seats. In particular, there are several unzoned, choice middle schools in District 28, and those schools rarely have open seventh-grade seats, which become available only if sixth graders leave the school. As a result, students who

remain at P.S. 139 or P177Q@Q139 through sixth grade will have fewer options than their peers who start middle school a year earlier.

This proposed grade truncation will help standardize middle school application and entry grades in District 28, giving all P.S. 139 and P177Q@Q139 students access to the same range of middle school options as their peers throughout the District.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at P.S. 139 Rego Park on December 8, 2010. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 20 members of the public attended the hearing, and 5 people spoke. Present at the hearing were Jeannette Reed, Community District 28 Superintendent; School Leadership Team members Kelly Grupper, Josephine Cao-Cheng, Ingrid Gil, Theresa Smith, Erin Hookim, Elizabeth Sparling, Stephanie Zevou, and Alsina Perry; Parent Association Co-Presidents Diane Leibowitz and Rosemary Kiladitis; District 28 CEC members Kathryn Thome and Ying-Zi Yang; District 75 P177Q Principal Kathleen Posa; P.S. 139 Principal Monica Powers-Meade; Citywide District 75 Council (“D75 Council”) President Tom Ryan; and District 75 Superintendent Gary Hecht.

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

1. CEC 28 Treasurer Kathryn Thome expressed the unanimous support of CEC 28 for the truncation because it will best serve the district’s students for middle school
2. SLT member Elizabeth Sparling stated that the SLT had been discussing the truncation since last spring, and in the early fall, the SLT voted unanimously to support the proposal.
3. SLT member and PA Co-President Diane Leibowitz stated that she had cast her vote in support of the proposal when the SLT voted on it. However, she went on to express her belief that, although the DOE had presented the truncation proposal as a separate issue from the district’s adoption of middle school choice, the reality is that you cannot have one without the other. She expressed her belief that the school never really had the option not to truncate because of the situation created by middle school choice. Implementing middle school choice caused students who attend sixth grade in an elementary school not to have a real choice of where to attend middle school, and as a result, the school must truncate in order for the students to have a choice. She believes the DOE attempted to “foist a foregone conclusion” upon parents by making the truncation proposal seem to be separate from middle school choice.
4. Ms. Leibowitz also stated that she thinks the DOE ignored the social and academic benefits of attending sixth grade at an elementary school, which should have informed the decision to propose truncation.

5. Ms. Leibowitz also stated that the 41 seats that would become available in the building as a result of the truncation would not enable the school to reinstate its Science lab and library based on the possible growth of her neighborhood, the impending influx of students, and the size of the current lower grades at the school. She thinks that the proposal will not relieve the overcrowding she anticipates at the school.
6. D75 Council President Tom Ryan expressed a belief that District 75 parents had not been brought into the conversation about potentially truncating the school.
7. A commenter said that she thinks the DOE should have truncated the sixth grade without “going through the motions” because she agrees with Ms. Leibowitz’ dissatisfaction with the way the proposal was handled.
8. A commenter expressed concern about her children taking public transportation to get to school in the sixth grade because of the dangers involved.
9. A commenter stated that something should be done to make sixth graders feel more comfortable in a middle school environment.

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

Two written comments were received.

10. A commenter expressed support for the truncation proposal because of the choices available to rising sixth graders and the limited space in P.S. 139, which she believes will become an issue for the school as the neighborhood grows bigger.
11. D75 Council President Tom Ryan wrote to say that he had been informed that there would be no adverse effect on D75 students as a result of this proposal and that there is space available in District 28’s middle schools to properly accommodate D75 students. He stated that the D75 Council would support the proposal if a list of conditions were met, which were that the school administration and SLT were in support of the proposal, appropriate programs remain available to D75 students affected by the proposal, all D75 students continue to receive the services mandated according to the IEPs, and all shared spaces are shared fairly between schools, so that D75 students are not excluded.

The DOE received comments which did not directly relate to the proposal.

12. A commenter asked if new construction could be done at P.S. 139 to add a new pre-fabricated wing to the building in order to ease overcrowding, which she believes is going to take place in the near future.
13. A commenter queried about how to withdraw her child from the school’s occupational therapy services and receive in-home services instead.

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

Comments 1, 2, and 10 express support for the proposal and do not require analysis.

With regard to comments 3 and 7, as indicated in the EIS, the District 28 Community Education Council voted to adopt Middle School Choice in June 2010. Contrary to the commenter’s

suggestion, the Middle School Choice process makes it easier for students to apply to multiple middle schools via the single application form, and the truncation of the sixth grade ensures that students will have the same access to their top choices as their peers throughout the District.

With regard to comment 4, as described in the EIS, there are several advantages of entering middle school in the sixth grade. For example, when students enter middle school at multiple entry grades (sixth and seventh), this creates challenges for both the students and the middle school as a whole. P.S. 139 students who start middle school in seventh grade may face transitional challenges related to entering middle school a year later than most of their classmates, and they remain in their new middle school for only two years before again transitioning to high school. Similarly, having students enter in multiple years creates an instructional challenge for middle school teachers and leadership who are responsible for preparing all students for high school. Those students who enter the middle school at seventh grade will not have the benefit of a sustained educational experience in the middle years; this has the effect of depersonalizing the school experience when adolescents tend to need the most personal and supportive environments.. Though there may be advantages to attending the sixth grade in an elementary school, such as continuing schooling in a familiar place for another year, the DOE has made clear that it believes that such advantages are outweighed by the advantages to students at P.S. 139 provided by entering middle school in the sixth grade.

With regard to comment 5, the EIS states, this proposal will create additional K-5 seats in an area where demand for elementary school seats is high. Thus, this proposal was made partly in response to overcrowding. The DOE has addressed overcrowding by proposing the creation of new schools in addition to proposing truncations of the sixth grade at several elementary schools, and the DOE continues to work with CEC 28 to address overcrowding. Regarding availability of a Science Lab or Library, decisions on how to utilize space allotted to the school are made by the school's principal.

With regard to comment 6, materials regarding the proposal were made available to all families of both P.S. 139 and P177Q@Q139 students. The materials included notices of the public hearing, parent letters, the EIS, a website dedicated to the proposal, and fact sheets summarizing the EIS. A comment line and e-mail address dedicated to feedback and questions regarding proposals is described in these materials. Contrary to Mr. Ryan's suggestion, all P177Q@Q139 parents were given the opportunity to attend the joint public hearing and provide comment on the proposal. Moreover, P177Q parents are invited to take part in the same PTA as P.S. 139 parents, and have all the same opportunities to engage the DOE during the proposal process. The DOE has been in conversation with D75 staff throughout the process, as well.

With regard to comment 8, the mode of transportation by which a sixth grader travels to school is not determined by the truncation, as the parent has a choice to apply for their child to attend whichever District 28 middle school they would like. Students also have preference to attend the middle school in their zone, which would be located within a reasonable distance of the home of a student living in that zone. Attending middle school does not necessarily mean that a child must take public transportation.

With regard to comment 9, as the EIS states, “[students who enter middle school in the sixth grade] will avoid transitional challenges related to entering the school a year later than most of their classmates.” The DOE believes that the proposal will ease the transition to middle school for elementary school students. Specific actions taken to make students feel comfortable take place on a school-by-school basis.

With regard to comment 11, as stated above, the administration and SLT have expressed unanimous support for the proposal. The availability of D75 programs on the middle school level are described in the EIS. Also, the EIS states, “Current fifth and sixth graders with Individual Education Plans (IEPs) or requiring ELL services will continue to receive appropriate services at the middle school to which they are matched.” The EIS also states, “After this proposal is implemented, there will be sufficient space to serve students in Q139 pursuant to the Citywide Instructional Footprint (the “Footprint”). Please visit the New York City Department of Education website to access the Instructional Footprint, which guides space allocation and use in City schools: http://schools.nyc.gov/NR/ronlyres/8CF30F41-DE25-4C30-92DE-731949919FC3/87633/NYCDOE_Instructional_Footprint_Final9210TNT.pdf.”

Changes Made to the Proposal

No changes in the proposal were made in response to public feedback.