



Public Comment Analysis
June 9, 2015

Carmen Fariña
Chancellor

Date: June 9, 2015

Topic: Proposed Amendments to Chancellor's Regulation C-175

Date of Panel Vote: June 10, 2015

Summary of Chancellor's Regulation C-175

Chancellor's Regulation C-175 sets forth the rules and limitations governing per session services provided by pedagogic employees. The regulation defines per session services, sets forth limitations on hours that may be earned in particular titles, explains the circumstances under which per session may be served, and provides for an approval and a waiver process and other procedures.

**Summary of Issues Raised in Written and Oral Comments
and Significant Alternatives Suggested**

Comments received are summarized as follows:

1. The definition of per session activity in the proposed amendment to the regulation is not sufficiently similar to the definition in the prior regulation.
2. The provision in the proposed amendment that gives the Chancellor the authority to waive the regulation if deemed to be in the best interests of the school system is impermissible.
3. An objection was made to the cap on hours for principals in the proposed amendment to the regulation.
4. An objection was made to new language added to the proposed amendment regarding pedagogues who have been reassigned from their positions not being allowed to work per session.
5. A request was made for the OP-175 form to be attached to the proposed amendment to the regulation, as it is attached to the current regulation.

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

1. The definition of per session services in the proposed amendment was revised to align more closely with the definition in the current regulation.
2. The proposed amendment was revised to delete the provision allowing the regulation to be waived if deemed to be in the best interests of the school system.
3. The cap on hours for principals in the proposed amendment was included, and remains, for sound policy reasons, including but not limited to, promoting fairness in assigning per session work to supervisors in the school building.
4. The proposed amendment was revised to delete language concerning pedagogues who have been reassigned from their positions not being allowed to work per session.
5. Form OP-175 was made an attachment to the proposed regulation.

A copy of the proposed revised Regulation can be obtained at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2014-2015/June2015Regulations>