

Amended Public Comment Analysis

Date: February 24, 2015

Topic: The Proposed Grade Expansion of the Young Women’s Leadership School of the Bronx (09X568) with Existing School I.S. 117 Joseph H. Wade Academies (09X117) in School Building X117 Beginning in the 2015-2016 School Year

Date of Panel Vote: February 25, 2015

Summary of Proposal

The original Panel for Educational Policy (“PEP”) vote for this proposal was scheduled for the January 29, 2015 meeting of the PEP. The members of the PEP decided to move this proposal from the agenda of the January PEP meeting to the February PEP meeting, which is scheduled for February 25, 2015. This Public Comment Analysis has been amended to include comments submitted after the first Public Comment Analysis was posted on January 28, 2015.

In an Educational Impact Statement (“EIS”) posted on December 15, 2014, the New York City Department of Education (“DOE”) proposed to expand the grades served by the Young Women’s Leadership School of the Bronx (09X568, “YWLS Bronx”) in school building X117 (“X117”) from grades six through eight to grades six through twelve, beginning in the 2015-2016 school year. YWLS Bronx is an all-girls district school that currently serves students in grades six through eight in building X117, located at 1865 Morris Avenue, Bronx, NY 10453, in Community School District 9 (“District 9”). YWLS Bronx is co-located with I.S. 117 Joseph H. Wade Academies (09X117, “I.S. 117”), an existing district middle school that serves students in grades six through eight. Building X117 also houses the Substance Abuse Prevention and Intervention Specialists (“SAPIS”) program and Beacon, a community-based organization (“CBO”).

On January 28, 2015, the DOE posted an Amended EIS to clarify information regarding the School Renewal Program, which is being implemented for I.S. 117 in X117. As a part of the School Renewal Program, I.S. 117 will adopt a Community School model beginning in the 2015-2016 school year. While the DOE does expect this potential grade expansion to impact any tailored ancillary services, extended instruction time, or other additional resources I.S. 117 may receive as a result of the School Renewal Program and the school’s designation as a Community School, the DOE will re-evaluate the space allocations outlined in the EIS after I.S. 117’s particular Community School model has been developed.

If this proposal is approved, the DOE plans to gradually decrease I.S. 117’s enrollment by approximately 124-154 students over the course of three years. I.S. 117 will admit fewer sixth-grade students beginning in the 2015-2016 school year and will reach a smaller, more stable enrollment in the 2017-2018 school year. All current I.S. 117 students will have the opportunity to complete their middle school education at I.S. 117, and I.S. 117 will remain an option for future students. This proposal will not impact the school’s participation in the School Renewal Program.

On March 21, 2012, the PEP approved the proposal to open and co-locate grades six through eight of YWLS Bronx with I.S. 117 in the X117 building. Although the proposal involved siting only grades six through eight of YWLS Bronx, it indicated that the school intended to serve grades six through twelve

long term, and stated that the DOE would publish another EIS in the future regarding the siting of YWLS Bronx's grades nine through twelve. This proposal, if approved, will enable YWLS Bronx to serve its high school grades alongside its middle school grades in X117 and will make it possible for current and future eighth-grade students from YWLS Bronx to continue their education at YWLS Bronx in the X117 building. If this proposal is approved, in 2015-2016, YWLS Bronx will begin serving approximately 80-90 ninth-grade students in building X117. YWLS Bronx will add one additional grade each year until the school reaches full grade scale in the 2018-2019 school year, when it will serve approximately 560-630 students in grades six through twelve.

Beginning in September 2015, I.S. 117 will admit a smaller incoming sixth-grade class of approximately 155-165 students, as opposed to the approximately 205-215 students it has served in sixth grade in recent years. I.S. 117 currently admits students to three programs: a zoned program that is opened to zoned students, a limited unscreened program open to students who are residents of Districts 9 and 10, and a screened program open to students who are residents of Districts 9 and 10. This proposal will not impact I.S. 117's current admissions methods; however, in 2015-2016, the limited unscreened program will admit fewer students. In the 2016-2017 school year and beyond, I.S. 117 will no longer admit students through the unscreened program and will only admit students through the zoned and screened programs.

Building X117 has the capacity to serve 1,123 students. Currently, in 2014-2015, the X117 building has a total enrollment of approximately 873 students, which yields a target utilization rate of 78%. This means that the building is under-utilized and that the space could be used more efficiently to serve more students. If this proposal is approved, once YWLS Bronx completes its grade expansion, a total of 1,025-1,125 students will be served collectively by I.S. 117 and YWLS Bronx, yielding a projected target utilization rate of 91% - 100%. The X117 building has sufficient space to accommodate both schools under this proposal.

The details of this proposal have been released in an EIS, which can be accessed online at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2014-2015/February2015SchoolProposals>.

Copies of the EIS are also available in the main offices of I.S. 117 and YWLS Bronx.

Summary of Comments Received at the Joint Public Hearing

A Joint Public Hearing regarding this proposal was held at building X117 on January 15, 2015. At that hearing, interested parties had the opportunity to provide input on the proposal. Approximately 490 members of the public attended the hearing, and approximately 60 people spoke. Present at the hearing were: Leticia Rodriguez-Rosario, District 9 Community Superintendent; Marilyn Espada, Community Education Council ("CEC") 9 President; Nora Mercado, CEC 9 Treasurer; Delise Jones, Principal of I.S. 117; I.S. 117 School Leadership Team ("SLT") Members April Crittendon, Pedro Lugo, Jessica Pineda, Alfonso Ponce, Emma Duran, and Darlene Attong; LeMarie Laureano and Devon Eisenberg, YWLS Bronx Co-Directors; and YWLS Bronx SLT Members Jana Lee, Jane O'Connor; Christina McNamee, Charisse Lewis, Sonia Villanueva, and Maria Torres. Bridget Mercier and Ashley Davies from the DOE's Office of District Planning were also present.

Prior to the public comment portion of the hearing, statements and presentations were given by CEC 9, YWLS Bronx, and I.S. 117. The information shared during these presentations is described below.

The following questions, comments and remarks were made at the Joint Public Hearing:

1. CEC 9 President Marilyn Espada spoke on behalf of CEC 9 in opposition to the proposal, stating that:
 - a. When the CEC was first presented with a proposal for YWLS Bronx, the DOE initially proposed to site grades six through eight in the X117 building, but the DOE is now proposing to site grades six through twelve.
 - b. As a result of the co-location with YWLS, I.S. 117 has no dedicated parent room. A custodial closet is serving as the parent room.
 - c. When the DOE met with the I.S. 117 SLT it provided misinformation about the size of I.S. 117's enrollment reduction, and therefore another meeting was requested by the school to discuss enrollment changes.
 - d. 130 students will be turned away by I.S. 117 as a result of this proposal and these students will have to travel to another school. Ms. Espada asked why I.S. 117 should downsize when it serves all students in the community.
 - e. YWLS Bronx does not serve students with disabilities and serves seven or eight ELL (English Language Learner) students.
 - f. Ms. Espada also asked if a decision has not been made in regards to the proposal, why did YWLS Bronx eighth grade students not receive high school admission books to explore other high school opportunities?
2. The Co-Directors of YWLS Bronx offered a PowerPoint presentation in support of the proposal. The first part of the presentation featured a video of YWLS Bronx students discussing the qualities of the school and why they liked the school. The Co-Directors then went through PowerPoint slides discussing the mission of YWLS Bronx, the school's partnerships, and the school's grants.
 - a. The Co-Directors provided information about the school, including the fact that the school is a DOE public school, not a charter school. They also asserted that 53% of students are from Districts 9 and 10, 65% of students enter the school with scores below proficiency level, 24% of students learn differently and/or are ELLs, and 71% of students make at least 1 year of progress on the state exams. The presentation also provided comparative information on the percent of students passing the state exams.
 - b. The Co-Directors also outlined what sharing the space might look like if the proposal was approved by the PEP; and noted that I.S. 117 and YWLS Bronx have in the past and should continue to work together to increase the chances of success for their students.
3. The Principal of I.S. 117 offered a PowerPoint presentation in opposition to the proposal. The presentation used a video to highlight the programs, offerings, and activities available to the I.S. 117 school community. The presentation featured students sharing their favorite memory about I.S. 117 and stating that I.S. 117 is a strong and resilient school.
4. An SLT member from YWLS Bronx, speaking in support of the proposal commented that YWLS Bronx serves special education students, a point that was reiterated by several other commenters.

- a. The SLT member stated that YWLS Bronx’s special education population is comparable to the rest of the population in the district.
5. An SLT member from YWLS Bronx in support of the proposal, along with several others, commented that all-girls schools are beneficial to girls and can help girls achieve better outcomes.
6. An SLT member from I.S. 117 opposed to the proposal commented that I.S. 117 does not have the space that YWLS Bronx does.
 - a. The SLT member also stated that YWLS Bronx screens girls from all over the Bronx while I.S. 117 is a community school.
 - b. Several commenters, including this SLT Member, expressed concerns that students will have to attend school outside of the community and parents/students may have to travel to their school, and experience hardship as a result of that travel.
 - c. The SLT Member also asserted that when YWLS Bronx was co-located with I.S. 117 for grades six through eight, I.S. 117 lost 13 rooms off of the fourth floor, and it lost its parent room. She stated that a closet is now being used as the parent room.
7. An SLT member from YWLS Bronx in support of the proposal stated that the expansion will be beneficial and that YWLS Bronx’s innovative practices have yielded success for the school. The SLT member also stated that YWLS Bronx has a focus on engagement, STEM (science, technology, engineering, mathematics) curriculum, and after school programs.
8. An SLT member from I.S. 117 opposed to the proposal stated that when YWLS Bronx was first co-located in X117, male students from I.S. 117 only had one bathroom available, and it took three years for the boys to get another bathroom while YWLS Bronx received a bathroom in the second year. This SLT member inquired whether or not I.S. 117 would lose another bathroom if YWLS Bronx expands.
9. An SLT member from I.S. 117 opposed to the proposal asked what will happen to the shared spaces as YWLS Bronx’s enrollment grows.
10. An SLT member from I.S. 117 opposed to the proposal asked why should there be gender separation in schools and stated that this seems like separate but unequal practice.
11. An SLT member from I.S. 117 opposed to the proposal questioned how many YWLS Bronx students were from the community and stated that the proposal would disrupt the District 9 community.
12. An SLT member from I.S. 117 opposed to the proposal stated that I.S. 117 also wants its students to succeed, but it serves both girls and boys and has a lot of male students.
 - a. This SLT member, along with many other commenters, stated that I.S. 117 serves all students (including both genders, ELL students, special education students, and students who live in temporary housing).

- b. The SLT member also stated that I.S. 117 students will be displaced from the X117 building, and they may be truant or drop out if they have to travel a farther distance to school.
13. Marilyn Espada disagreed with someone in the audience recording the hearing and asked for this person not to record her comments.
14. One commenter asked what will happen to ELL students if this proposal is approved.
 - a. This commenter, along with many other commenters, questioned what will happen to boys in the community since the proposal would expand an all-girls school.
 - b. This commenter, along with several other commenters, asked what will happen to students who want to go to I.S. 117 but may not be able to.
 - c. This commenter also asserted that this is the only District 9 middle school in the area.
15. Several commenters stated I.S. 117 is a school for the community.
16. Several commenters expressed concern about YWLS Bronx expanding to the point where it will require all of the space in the building.
 - a. Several commenters expressed concern that the entire school building will become an all-girls school.
17. Many commenters expressed concern about the reduction at I.S. 117.
 - a. Many commenters expressed concern that the DOE is taking away space from I.S. 117 or reducing enrollment at I.S. 117.
 - b. Many commenters expressed concerns that students will not be able to attend I.S. 117 in the future.
18. Many commenters expressed support for the YWLS Bronx expansion.
 - a. Many commenters said they want YWLS Bronx to offer high school.
 - b. Several commenters said they want YWLS Bronx middle school and high school to be kept together in the same location.
 - c. One commenter stated that YWLS Bronx is the only school in the Network that does not serve high school.
19. One commenter said YWLS Bronx students are from the surrounding areas and the Bronx.
20. A couple of commenters expressed concern about the proposal, noting that there have been episodes of bullying between YWLS Bronx and I.S. 117 students.
21. Several commenters stated that I.S. 117 is a good school.
 - a. Several commenters said I.S. 117 has good teachers/staff.

22. Many commenters stated that YWLS Bronx is a good school.
 - a. Several commenters said YWLS Bronx has good teachers/staff.
23. Many commenters stated that I.S. 117 needs more space, with one commenter indicating that more space would enable I.S. 117 to serve the whole community.
24. One commenter said that he wished I.S. 117 went up to twelfth grade so he could stay at the school. The commenter remarked that he has a great teacher and has been supported by the staff at I.S. 117 and wanted to thank them.
25. A representative from Girls Inc. in support of the proposal stated that YWLS sets the bar high and the partnership with YWLS Bronx will grow if the school is expanded.
26. A few commenters said both schools at X117 should work together and support each other.
27. One commenter in favor of the proposal stated that the YWLS Network has some of the top schools and has inspired a movement of all-girls schools that has received positive public attention.
 - a. This commenter, along with a few others, noted that the Eagle Academy is an all-boys school option for boys in the community.
28. One commenter stated that I.S. 117 female middle students could attend YWLS Bronx for high school.
29. The Parent Coordinator at I.S. 117 stated that YWLS Bronx was not included in the high school admissions book, but was listed on an add-in sheet instead. The commenter expressed concern about when YWLS Bronx students received their high school admissions books and whether or not students had the ability to meet the deadline to apply to specialized high schools.
30. One commenter from YWLS Bronx in support of the proposal said YWLS Bronx students were given the opportunity to look at schools and make choices other than YWLS Bronx for high school.
31. Several commenters in support of the proposal discussed the programming and partnerships at YWLS Bronx.
32. One teacher from I.S. 117 commented that I.S. 117 offers both special education services and bilingual special education services, and that I.S. 117's special education classes used to be on the fourth floor in classrooms that easily accommodated self-contained classes. Now YWLS Bronx occupies the fourth floor, but it does not have self-contained classes. The commenter asserted that the School Construction Authority will need to break down the walls separating the classrooms on the 4th floor to create full-size classrooms to accommodate YWLS Bronx's expansion. The commenter questioned what the impact of construction would be on students in the building.
33. One commenter noted that I.S. 117 has a high percentage of ELL students, special education students, students eligible for free and reduced priced lunch, and students from temporary housing.

- a. This commenter also asked, if this proposal goes through, which students would choose to travel to their school and which students would be forced to travel to their school.
34. One commenter in support of the proposal stated that YWLS Bronx has an impressive culture and that she supports the DOE’s middle school choice process.
35. One commenter opposed to the proposal stated that the original proposal was to expand YWLS Bronx to serve grades six through eight and now the school will expand through grade twelve.
- a. This commenter, along with several others, stated that YWLS Bronx should expand somewhere else.

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

The DOE received 37 emails through the dedicated email address for this proposal. Many of the comments submitted via email were also shared at the Joint Public Hearing and are incorporated in the previous section. Through the dedicated email address, the DOE also received a letter in opposition to the proposal from an English Language Arts (“ELA”) class (students, paraprofessionals, and teacher) at I.S. 117 addressed to Superintendent Rodriguez-Rosario containing comments and questions about the proposal.¹ Many of these comments and questions were also shared at the Joint Public Hearing for this proposal and therefore have been included in the previous section. The following section, therefore, summarizes the remainder of the comments received through the dedicated email address and included in the aforementioned letter, which were not shared during the Joint Public Hearing. Six of the 37 emails received through the dedicated email address for this proposal were submitted after the first Public Comment Analysis and all new issues raised are incorporated below.

The DOE also received 11 comments through the dedicated phone line for this proposal, three of which were received after the first Public Comment Analysis was posted. All of these comments are described below (if not accounted for in the previous section).

The following comments were submitted through the dedicated email address and phone line:

36. The above-described letter from an ELA class at I.S. 117 in opposition to the proposal stated the following comments and questions.²
- a. The letter stated concerns about the decrease in enrollment at I.S. 117 and whether the YWLS Bronx expansion will result in fewer resources for children in one of the poorest U.S. communities.
 - b. The letter stated that the expansion of a single-gender screened school runs counter to the Mayor’s vision for NYC and may violate equal protection under the law.
 - c. The letter stated that expanding YWLS Bronx effectively means reducing I.S. 117’s ability to serve middle school students from the community.

¹ The DOE received three oral comments by telephone, which were duplicative of the letter from the I.S. 117 ELA class addressed to Superintendent Rodriguez-Rosario, which was submitted through the designated email address. All three commenters read portions of the letter, described in detail and addressed in this Public Comment Analysis.

² Following the posting of the Public Comment Analysis, this letter was re-forwarded to the dedicated email address by the DOE’s Communications and External Affairs office, which also received the letter since it was copied to the Chancellor. The letter was also re-submitted to the dedicated email address for this proposal.

- d.** The letter stated that community schools like I.S. 117 provide a vital service to students who do not attend screened schools.
- e.** The letter commented that the YWLS network has wealth and they should be able to build their own school instead of take away space from I.S. 117, which needs more support.
- f.** The letter asserted that class size matters more than school size and recommended creating more small classrooms with more teachers.
- g.** The letter stated that comparing the two schools' test scores is unfair since the schools differ.
- h.** The letter included several questions from students. Questions not otherwise raised are listed below.
- i.** We are eighth grade students, boys and girls, with IEPs; will YWLS accept us for high school next year?
- j.** What is the admission process for YWLS?
- k.** Where will I.S. 117 students have physical education?
- l.** Where will I.S. 117 students use the bathroom?
- m.** Where will I.S. 117 students see the nurse?
- n.** Is it constitutional to have a single-sex public school?
- o.** What is the evidence that supports single-sex education?
- p.** How can we get our fourth floor back?
- q.** Does YWLS accept students with disabilities and how many?
- r.** Does YWLS accept safety transfers and how many?
- s.** What students will be able to attend I.S. 117 next year?
- t.** Will there be a middle school that serves our community?
- u.** How will I.S. 117 students access the library?
- v.** Where will the I.S. 117 basketball team play?
- w.** What will happen to the I.S. 117 teachers?
- x.** How many YWLS students live in our community?
- y.** Where will the students that cannot attend I.S. 117 or YWLS go to school?

37. CEC President Marilyn Espada submitted two comments by email, which she also shared at the Joint Public Hearing; they are described in the preceding section.
38. Many comments received via email stated that students want their siblings and relatives to be able to attend I.S. 117 in the future.
39. Several commenters stated that I.S. 117 students had less gym time after YWLS Bronx was co-located in building X117.
40. One commenter stated that I.S. 117 lost its art room after YWLS Bronx was co-located in building X117.
41. Many commenters stated that it is not fair to reduce I.S. 117's enrollment and expand YWLS Bronx.
 - a. As mentioned in the Joint Public Hearing comments section, many commenters expressed concern about YWLS Bronx taking over the whole school building.
42. Many commenters stated that YWLS Bronx should not get more space in building X117.
43. One commenter asked what would happen if I.S. 117 is shut down.
44. One commenter stated that expanding YWLS Bronx would mean that the school would need to take the entire third floor as well.
45. One commenter stated that members of the community are petitioning the PEP to vote against the proposal.
46. One oral commenter stated that the PEP should vote no on this proposal because he did not believe it benefited the entire community.
47. One oral commenter expressed anger about the expansion because I.S. 117 serves the entire community and YWLS Bronx screens its students.
48. One oral commenter stated that she is against the reduction of I.S. 117 because it provides a lot of programs and services to the students in the community.
49. One oral commenter opposed to the proposal requested that the PEP vote no or defer the proposal and alleged that there is a conflict of interest with the relationship of the Tisch family to the YWLS Network and the fact that Merryll Tisch is the Chancellor of the NY State Board of Regents.
50. One oral commenter expressed support for the proposal, stating that she was happy her daughter had the opportunity to receive a quality education at YWLS Bronx, a school in her community.
51. One commenter provided an email in support of the proposal after the original deadline for the Public Comment Analysis, stating YWLS Bronx offers a wonderful learning opportunity for female students in the Bronx, and that it would be a disservice to not enable YWLS Bronx to expand to serve high school grades since the school's model is a 6-12 school.

52. One commenter submitted a written comment in opposition to the proposal after the Public Comment Analysis was posted, stating concern about the enrollment reduction of I.S. 117, noting its potential impact on students in the community who face unique challenges and questioned where these students will go to school.
53. One commenter stated the following after the Public Comment Analysis was posted:
- He thought the proposal would be voted on at the March PEP meeting and is upset to hear that the proposal will be voted on at the February PEP meeting.
 - It will be challenging for I.S. 117 families to attend the PEP meeting in Manhattan given the distance from the Bronx.
54. One commenter expressed support for YWLS Bronx after the Public Comment Analysis was posted.
55. One commenter expressed opposition to the proposal through a letter submitted via email, which was addressed to the PEP and signed by the I.S. 117 ELA class. The letter and asked the following questions:³
- Who within the DOE proposed the expansion of YWLS?
 - What is your analysis of I.S. 117's decline in enrollment?
 - When is the DOE a separate entity from the NY State Board of Regents?
 - Where are the 8th grade students at YWLS going to high school?
 - Why does the doe feel that allocating space to YWLS Bronx is important simply because the school is part of the YWLS Network?
 - How are the scores of schools that screen applicants compared with the scores of schools that do not screen applicants?
56. One commenter forwarded previously-submitted comments and expressed support for the proposal again.

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

- Comments 1(a.) and 35 pertain to the fact that when YWLS Bronx was first co-located with I.S. 117 in the X117 building, the proposal initially sited YWLS Bronx's grades six through eight in Building X117, but now the DOE has proposed to site grades six through twelve of YWLS Bronx in Building X117. The commenters are correct that on March 21, 2012, the PEP approved the proposal to open and co-locate grades six through eight of YWLS Bronx with I.S. 117 in the X117 building. That proposal is available online at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Mar212012Proposals.htm>.

³ These questions were also submitted through the dedicated phone line for this proposal.

Although that proposal involved only siting grades six through eight of YWLS Bronx, it indicated that the school would grow long term to serve grades six through twelve and stated that the DOE would publish another EIS in the future regarding the siting of grades nine through twelve. At the time of the first proposal in 2012, building X117 did not have sufficient space per the Citywide Instructional Footprint (“Footprint”) for the siting of grades six through twelve. In the several years between the posting of the proposal in 2012 and the proposal now under consideration by the PEP, I.S. 117’s enrollment has declined such that space became available in the X117 building, and the siting of the remainder of YWLS Bronx’s grades became a possibility. As such, the DOE has now proposed to site YWLS Bronx’s additional grades in the X117 building, even though that was not intended at the time of the original proposal that sited YWLS Bronx in X117.

- Comments 1(b.), 2(b.), 6, 6(c.), 8, 9, 23, 26, 32, 36(k.) (l.) (m.) (p.) (u.) (v.), 39, 40, 42, and 44 are related to space issues and the process by which the DOE allocates space. There are currently hundreds of schools in buildings across the city that are co-located, some of which are multiple DOE schools. In all cases, the Footprint is applied to schools to ensure equitable allocation of classroom, resource, and administrative space. The Footprint is available online at: http://schools.nyc.gov/NR/rdonlyres/961D691C-641D-4918-9798-8BA2C0A761FF/0/DOEFootprint_91114newlogo.pdf.

The ultimate usage of rooms within a school’s Footprint allocation is at the discretion of the principal. Thus, in response to Comments 1(b.) and 40, it is up to the principal to determine whether dedicating an art room or a room to serve parents is the best use of space to meet the school’s overall needs; if the principal determines that a room can better serve students in another way, s/he has the discretion to allocate space in that way.

As in other situations where schools are co-located, I.S. 117 and YWLS Bronx share large common and specialty rooms in the building, which in this case includes an auditorium, two gymnasiums, a library, a dance room, a space for the school-based support team, a space for school safety, a space for the nurse’s office, a space for the custodian’s office, and a space for CBO Beacon. Specific decisions regarding the allocation of the shared spaces are made by the Building Council, consisting of principals from both co-located schools, in conjunction with the DOE’s Office of Space Planning. In any building where more than one school is co-located, the Building Council meets regularly to address issues related to space allocations and shared space usage.

If this proposal is approved, all schools will continue to share common spaces, and the principals of all schools will continue to work together to determine the usage and scheduling of shared spaces.

When YWLS Bronx was first co-located with I.S. 117 in building X117, I.S. 117 was using space in excess of its Footprint allocation since it was the only school in the building. When the proposal was approved by the PEP in 2012, YWLS Bronx was allocated rooms on the fourth floor of X117 to meet its Footprint allocation for grades six through eight.

If approved, the proposal currently under consideration provides both schools with their Footprint allocation based on each school’s planned enrollment. Even after both schools receive their baseline allocation of space under the Footprint, there will still be excess rooms available in the building. The ultimate allocation of space and the location of classrooms for both schools will be determined by the Office of Space Planning in conjunction with the principals in building X117.

If the proposed co-location is approved by the PEP, the Building Council is encouraged and empowered to determine a shared space schedule that minimizes the disruption to the current use of shared spaces and provides sufficient time for all students to be served (e.g. in the gymnasium).

If the principals are unable to agree upon a schedule for shared spaces, school leaders should utilize the dispute resolution process outlined in the Campus Policy Memo, which is available at <http://schools.nyc.gov/community/campusgov>.

With regard to the question about bathrooms in Comment 8 and 36(l.), the Building Council will work together to determine how bathrooms will be shared in the building. 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 the allocation of time in bathrooms is not working or is inadequate, the Building Council may discuss alternative arrangements, such as the assignment of specific bathrooms.

With regard to the question about potential construction in Comment 32, there are no current plans to remove walls to convert the half-size classrooms to full-size classrooms on the fourth floor.

With respect to comment 36(m.), students will continue to have access to the nurse's office. Additional guidance regarding the governance of shared space is available at <http://schools.nyc.gov/community/campusgov>.

Comments 1(c.), 17, 17(a.)(b.), 36(a.), 36(d.)(f.), 36(e.), 41, 41a, 43, and 48 relate to the enrollment reduction at I.S. 117 and opposition to the reduction. As stated in the EIS, I.S. 117's enrollment will decrease by approximately 124-154 students if this proposal is approved. The reduction will be implemented over the course of three years through decreasing and eventually eliminating I.S. 117's limited unscreened program. I.S. 117 has seen a decline in its enrollment in recent years, and has gone from 866 students in the 2008-2009 school year to 619 students in the current 2014-2015 school year. The DOE believes that the school's participation in the School Renewal Program, coupled with a reduced enrollment that will promote a targeted focus on a smaller student body, will benefit current and future I.S. 117 students. In response to Comment 48, the DOE encourages I.S. 117 to continue providing services and programs to the community and the DOE believes that I.S. 117's participation in the School Renewal Program will enhance its ability to do so.

With regard to comments that I.S. 117 will be not be a school option moving forward or that the DOE plans on closing I.S. 117, these mischaracterize the proposal. The EIS currently under consideration proposes to reduce the enrollment at I.S. 117, but it does not propose to close I.S. 117. I.S. 117 will continue to serve students in grades six through eight, and, if approved, YWLS Bronx will serve students in grades six through twelve in X117. No other changes in school utilization or enrollment sizes are planned at this time. The DOE would need to issue a separate EIS and adhere to all other components of the Chancellor's Regulation A-190 for any other significant changes to school utilization.

With respect to Commenter 36(a.)'s question about resources, the DOE notes that a school's operating budget will increase with an increase in enrollment, or decrease with a decrease in enrollment. Most funding in schools' budgets is allocated on a per-pupil basis, based on current by

the Fair Student Funding (“FSF”) per capita allocation levels. Therefore, as I.S. 117’s enrollment decreases, it will receive less funding—though the school will have the same amount of funding per student served. However, the DOE notes that as part of I.S. 117’s participation in the School Renewal Program, the school will receive additional resources for academic intervention and professional development to create a better learning environment for students. The school could also offer additional instructional and extracurricular learning opportunities, as needed.

With respect to Comments 36(u) and 36(v.), I.S. 117 will still have access to the library, as well as the gymnasium where basketball students can play basketball.

- Comments 1(d.), 6(b.), 12(b.), 14, 14(a.) (b.) (c.), 33(a.), 36(c.) (d.) (t.) (s.) (y.), 38, and 52 pertain to the ability of I.S. 117 students to continue attending I.S. 117, and available school options for students in the future. As noted above and in the EIS, current I.S. 117 students will have the opportunity to continue attending I.S. 117 for middle school, and students will continue to have the option to choose I.S. 117 for middle school in the future.

Specifically in reference to comments about I.S. 117’s ability to accommodate students from the community, I.S. 117 has had a fairly stable sixth-grade zone size (ranging from 339 to 391) in the last three years, with zone retention rate averaging 32%. This means that not all students zoned to I.S. 117 choose to attend I.S. 117 for school. So as to not limit I.S. 117’s ability to admit students from its zone, the enrollment reduction will be implemented by decreasing and eventually eliminating I.S. 117’s limited unscreened program. The admissions methods will be unchanged for the 2015-2016 school year as a result of this proposal, but the limited unscreened program will admit fewer students. In the 2016-2017 school year and beyond, I.S. 117 will no longer admit students through the unscreened program and only admit students through the zoned and screened programs.

While the expansion of YWLS Bronx will reduce the amount of excess space currently available for I.S. 117, the expansion is not expected to impact I.S. 117’s ability to admit students residing in its zone consistent with its admissions patterns because I.S. 117 will continue to receive its baseline allocation of space according to the Footprint and therefore will be able to serve all students based on enrollment projections.

In addition, it also bears noting that there is excess middle school capacity in District 9, as there are several schools in District 9 that serve middle school grades. I.S. 117 serves approximately 210 sixth-grade students. In 2014-2015, there are approximately 3,170 sixth-grade students enrolled in District 9 middle schools and charter middle schools located in District 9. Including the seats currently available at I.S. 117, there are approximately 3,926 total sixth-grade seats in District 9 middle schools and charter schools located in District 9, meaning there is an excess of approximately 756 sixth-grade seats in the district.

Excluding the seats currently available at I.S. 117 that would no longer be available after the enrollment reduction described in this EIS, there are approximately 3,876 total sixth-grade seats in District 9 middle schools and charter schools located in District 9. Therefore, even after excluding the seats that would have been offered at I.S. 117, there are still approximately 706 excess sixth-grade seats in District 9 middle schools.

Additionally, Districts 9 and 10 share a Middle School Admissions Process, which means that District 9 and District 10 students have equal preference for schools and programs in both districts. Fifth-grade students who meet promotional standards and live within either district are eligible to apply to District 9 or 10 middle schools. Students rank their preferences from among the District 9 and District 10 middle schools and programs, as well as their zoned option. These options may include:

- Middle schools or programs with a screened admissions method (admission is based on criteria designated by the school);
- Middle schools or programs with an unscreened or limited unscreened admissions method (limited unscreened schools admit students on the same basis as unscreened schools except that they give preference to students who have attended a school information session);
- Zoned middle schools;
- K-8 schools with a zoned, screened, or unscreened admissions method for the middle school grades that have available seats for middle school students;
- 6-12 schools with an unscreened, limited unscreened, or screened admissions method for middle school students; and
- Schools with borough-wide or Citywide eligibility with unscreened, limited unscreened, or screened admissions methods.

In addition, new middle schools designated to open throughout the City will be available for students to consider. Pending PEP approval to open new schools, eligible students will have the opportunity to submit a “new schools” application. Information about middle school application deadlines will be available at the following link: <http://schools.nyc.gov/ChoicesEnrollment/Calendar>.

Middle school students with IEPs, with the exception of those recommended for placement in a District 75 school, are admitted to schools in the same manner as general education students. Schools will ensure that students with disabilities continue to receive mandated services in accordance with their IEPs while also ensuring such students have opportunities to learn alongside their non-disabled peers to the greatest extent possible. In accordance with DOE policy, ELL students are admitted to middle school in the same manner as their peers who are not ELL students. All students requiring ELL services will continue to receive appropriate services in accordance with DOE policy.

Information about all of these options is printed in each district’s Middle School Directory available on the DOE’s website (please note that this directory is updated yearly). General information about the Middle School Admissions Process can be found on the DOE’s website at: <http://schools.nyc.gov/ChoicesEnrollment/Middle/default.htm>.

With regard to questions and comments related to students traveling to school, the DOE does not believe this proposal will impact the ability of students from the community to attend I.S. 117. Students also have the option to attend other middle schools as described above; thus, even if students choose to attend middle schools other than I.S. 117, this does not mean they necessarily will have to travel very far to do so. Student transportation is governed by Chancellor’s Regulation A-801: <http://schools.nyc.gov/NR/rdonlyres/21A1B11A-886B-4F74-9546-E875EE82A14C/40303/A801.pdf>. In response to Comment 33(a.), the DOE does not intend to force students to travel to attend I.S. 117; interested students will continue to choose to enroll.

In response to Comment 14(a.), which asks about opportunities for boys in the community, the DOE

recognizes that the expansion of YWLS Bronx is an opportunity that only benefits girls; however, the DOE is continually looking to expand opportunities for boys citywide, as well. One example is Eagle Academy for Young Men, identified by Comment 27(a).

- Comments 1(e.), 2(a.), 4, 4(a.), 11, 12, 12(a.), 19, 33, and 36(g.)(x.) relate to the student demographics of I.S. 117 and/or YWLS Bronx.

With regard to Comments 11, 19, and 36(x.), 63% of YWLS Bronx's enrollment is comprised of District 9 and District 10 residents. This means that YWLS Bronx is serving students in the immediate community.

With regards to Comments 1(e.), 2(a.), 4, and 4(a.) about the types of students served at YWLS Bronx, the following information is available (based on the 2014-2015 Audited Register):

- Students Receiving Integrated Co-teaching Services: 7%
- Students Receiving Self-Contained Services: 0%
- Students with Individualized Education Programs: 17%
- English Language Learner Students: 6%
- Students Eligible for Free or Reduced Price Lunch: 87%

Contrary to comment 1(e.), YWLS Bronx does serve students with special needs, as indicated above. Though it does not presently have students who receive self-contained services, it does offer Integrated Co-Teaching services, and there are students who have Individualized Education Programs.

With regards to Comments 12, 12(a.), and 33 about the types of students served at I.S. 117, approximately 55% of students are males, and the following information is available (based on the 2014-2015 Audited Register):

- Students Receiving Integrated Co-teaching Services: 6%
 - Students Receiving Self-Contained Services: 12%
 - Students with Individualized Education Programs: 27%
 - English Language Learner Students: 38%
 - Students Eligible for Free or Reduced Price Lunch: 85%
- Comments 1(f.), 29, 30, and 37(a.) pertain to the distribution of the High School Directory to YWLS Bronx students. YWLS Bronx received a delivery of High School Directories and Specialized High School Student Handbooks on June 10, 2014. YWLS Bronx was not in the Directory at this time because there was no expansion proposal when the Directory was created, which is done each year in February. Once the High School Admissions Office was notified of this proposal, students were made aware of the possibility of continuing at YWLS Bronx through high school.

This notification to students did not signify that the proposal to expand YWLS Bronx was approved by the PEP or otherwise finalized. Chancellor's Regulation A-190 governs the public review process for proposals for significant changes in school utilization, including this proposal. For every proposal that involves a significant change, the DOE is required to: publish an EIS, schedule and convene a Joint Public Hearing to discuss the proposal, post notice of the JPH and PEP meetings, produce and

publish a Public Comment Analysis, and arrange for the PEP to vote on the proposal. No proposal is final or implemented until it is voted on and approved by the PEP.

High school applications were due in December of 2014. Through the High School Admissions process, students can list up to 12 different programs on the application and choose from over 400 schools offering more than 700 programs. Information on this process is available to anyone online at: <http://schools.nyc.gov/ChoicesEnrollment/High/default.htm>.

- Comments 2, 5, 7, 18(a).(b).(c.), 22, 22(a.), 25, 27, 31, 34, 50, 51, 54, and 56 are in support of this proposal and therefore do not require a response.
- Comments 3, 15, 21, 21(a.), and 24 express general support of I.S. 117.

The DOE recognizes the I.S. 117 community for its hard work and commitment to students. The DOE believes that this proposal will not prevent I.S. 117 from providing the support needed for its success and will continue to support I.S. 117 moving forward.

- Comments 6(a.), 10, 28, 36(b).(i).(j).(n).(o).(q).(r.), 46, and 47 pertain to the admissions method at YWLS Bronx. YWLS Bronx is designed to serve female students only. The school is part of the Young Women’s Leadership Network, an organization that helps create single-gender public schools and college access programs across the country, and whose mission is to raise expectations, improve student performance, and inspire leadership for young women.

YWLS Bronx admits students through the Middle School Admissions Process; the school is open to female students who are residents of the Bronx. YWLS Bronx offers a screened program and uses the following selection criteria: attendance at an open house or information session; review of attendance and punctuality; and review of grades and test scores. Consistent with New York State Education law, State ELA and Mathematics test results are not the sole, primary, or major factor in admissions decisions. Instead, multiple measures, which may include State test results, are used to make admissions decisions for screened programs. This information is available in the District 9 Middle School Directory: http://schools.nyc.gov/NR/rdonlyres/5ECD08D8-175D-4CB0-BFAA-C96FA0D64FB8/0/D9_1029.pdf.

The DOE has many different types of middle schools, including those with zoned, screened, limited unscreened, and unscreened admissions methods. The DOE also has many single-gender schools. The DOE supports all schools, regardless of their admissions methods.

- Comment 36(r.) concerns the admissions of students via safety transfers.

Per Chancellor’s Regulation A-449, student safety transfers generally are granted in situations when it is determined that a student’s continued presence in his or her current school is unsafe for the student. Alternative placement for students granted a safety transfer is overseen by the Borough Enrollment Offices. YWLS Bronx can receive an eligible safety transfer student if it has available seats to accommodate the safety transfer student matched to YWLS Bronx.

- Comment 13 concerns the fact that the hearing was recorded. Joint Public Hearings are open meetings, and any member of the public is able to attend. The DOE provides audio recordings through transcripts and video recordings of Joint Public Hearings. An announcement is made as part

of the hearing proceedings to inform attendees that the meeting is being recorded. Attendees from the public can record the hearing as well since it is an open meeting.

- Comments 16, 16(a.), 35(a.), 36(e.), and 41(a.) oppose the expansion of YWLS Bronx in X117. The Amended EIS posted on January 28, 2015 proposes to expand YWLS from grades six to eight to grades six through twelve. As noted in the EIS, the corresponding enrollment for YWLS Bronx is projected to be 80-90 students per grade.

With regard to the concerns that YWLS Bronx will expand beyond what is currently being proposed by the DOE, the DOE has no such plans. The EIS contains detailed enrollment projections for YWLS Bronx and I.S. 117 based on both schools' current enrollment trends. The DOE has allocated space in the building on the basis of these projections and has no plans to increase the number of seats at YWLS in the future. Accordingly, the DOE has no plans to make X117 an all-girls building, as Commenter 16(a.) contends.

With regard to the decision to expand YWLS Bronx in building X117, given that building space is scarce in New York City neighborhoods, and the growing enrollment needs of 1.1 million students, the DOE must use its existing public buildings in the most efficient manner possible. Sharing space is central to New York City's strategy for school improvement. DOE has over 900 schools and programs co-located with at least one other district or charter school in multi-school campus buildings. Expanding existing successful schools is necessary to ensure that students and families in every community have access to high performing educational options.

The DOE feels that allocating space to YWLS Bronx is important because the school is part of the Young Women's Leadership Network, an organization that helps create single-gender public schools and college access programs across the country, and whose mission is to raise expectations, improve student performance, and inspire leadership for young women. YWLS Bronx performs well in comparison to schools in District 9 and across New York City. In the 2013-2014 school year, YWLS Bronx ranked in the 80th percentile for District-wide and 65th percentile for Citywide English Language Arts ("ELA") proficiency scores. In the 2013-2014 school year, YWLS Bronx ranked in the 92nd percentile for District-wide and 74th percentile for Citywide math proficiency scores. Given YWLS Bronx's demand and performance, the DOE supports the expansion of YWLS Bronx.

- Comment 20 expresses concern about school safety and asserts that the co-location of I.S. 117 and YWLS Bronx has led to incidents involving bullying between students at each school.

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. Updates can also be made at any other time if 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.

The Office of School and Youth Development ("OSYD") supports schools in maintaining a safe, orderly, and supportive school environment. We encourage all schools, including those in X117, to

seek support from OSYD to address any issues involving safety and security, including gang-related issues. School Safety Agents (“SSAs”) are allocated to schools based on each building’s projected enrollment. The NYPD’s School Safety Division looks at a set of variables to determine the number of SSAs to deploy to a particular school building, including the crime rate, size and design of the building, enrollment, and grade span.

With respect to bullying, it is expected that each school will be respectful of the other school. The DOE hopes that the two schools will continue to work together to enhance the learning experience for all students in a safe and supportive environment that is free from harassment, intimidation and bullying.

- Comment 27(a.) acknowledges that District 9 has an all-boys school- Eagle Academy for Young Men (09X231), which serves male students in grades six through twelve and is located in District 9 at 4143 Third Avenue, Bronx, NY 10457. Eagle Academy admits male students through the Middle School Admissions process using a limited unscreened program that randomly selects male students within the following two priority groups: students and residents of the Bronx who sign in at an event, and students and residents of the Bronx. Commenters at the Joint Public Hearing stated that Eagle Academy was an all-boys option similar to the YWLS Bronx model. Though similarities include the six through twelve grade span model, location in District 9, and single-gender admissions, YWLS Bronx admits students through a Screened Program, while Eagle Academy admits students through a Limited Unscreened Program.
- Comment 36(w.) concerns the potential impact on I.S. 117 teachers.

As student enrollment at I.S. 117 declines, the school’s staffing needs may be reduced. All excessing would be conducted in accordance with existing labor contracts. For example, the current UFT contract would require excessing to take place in reverse seniority order within each given teaching license area. Barring system-wide layoffs, excessed teachers would be eligible to apply for other City positions, and any teachers who did not find a permanent position would be placed in the Absent Teacher Reserve (“ATR”) pool, meaning that they would continue to earn their salary while serving in the capacity of a substitute teacher in other City schools. Should there be a vacancy in the school in a teacher’s license area within one year of the teacher being excessed, the teacher would have a right of return to the school, consistent with applicable contractual provisions regarding teachers’ seniority.

- Comment 45 states that members of the community are petitioning the PEP to vote no on the proposal. This comment has been acknowledged in the Public Comment Analysis, though the DOE has not received a copy of a petition document from the public or any PEP members.
- Regarding Comment 49, the decision to propose the expansion of YWLS Bronx was made by the DOE, not by the NY State Board of Regents, which is a separate entity, independent from the DOE.
- Comments 53(a.) and 53(b.) concern the date and location of the PEP meeting where this proposal will be voted on.

The proposal to expand YWLS in the X117 building is being voted on at the February 25, 2015 PEP meeting, which will take place at the High School of Fashion Industries located at 225 West 24th Street, New York, NY 10011. The PEP votes on several proposals impacting schools across the city and the monthly meeting locations vary from month to month. Throughout the school year, PEP

meetings rotate amongst locations throughout all five boroughs. The January PEP meeting was held in the Bronx, which was convenient for many families to attend and provide their feedback on this proposal as well as other proposals impacting schools across the city. Locations for the PEP meetings are chosen based on the schools' ability to accommodate large public meetings, convenience to public transportation, and accessibility.

The proposal for X117 was postponed for a later vote at the January 2015 meeting of the PEP. The DOE determined that the vote for this proposal would be held at the February 2015 meeting of the PEP. Both YWLS Bronx and I.S. 117 received amended notices that provided information on the new PEP date and location for the proposal. A public notice is also available online at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2014-2015/February2015SchoolProposals>.

- Comment 55(a.) questions who within the DOE proposed the expansion of YWLS Bronx.

The decision to expand YWLS Bronx was a collaborative decision made among multiple individuals and offices within the DOE, including the Office of District Planning. In making these decisions, the DOE considers the needs of students and communities across the Bronx and the city as a whole. The DOE approved YWLS Bronx's new school application and issued a proposal to open YWLS Bronx in X117, which stated that the school would ultimately be a secondary school in accordance with the YWLS Network's model. As mentioned, the original proposal issued in 2012 was for the siting of YWLS Bronx's grades six through eight. This proposal is available online at: http://schools.nyc.gov/NR/rdonlyres/938CCA63-7D38-4CD6-9751-537F88BCC560/118900/09X568CoLocationinX117_vFINAL.pdf.

A need remains to site YWLS Bronx's grades nine through twelve, which is reflected in the proposal currently under consideration by the PEP.

- Comment 55(b.) asks about the analysis of I.S. 117's enrollment decline.

I.S. 117 has seen a steady decline in its enrollment in recent years and has gone from 866 students in the 2008-2009 school year to approximately 619 students⁴ in the current 2014-2015 school year. These numbers demonstrate a substantial decline in enrollment at I.S. 117.

- Comment 55(c.) asks when the DOE is a separate entity from the NY State Board of Regents.

As mentioned above in the response to comment 49, the DOE is a separate entity from the NY State Board of Regents. They are always separate entities.

- Comment 55(d.) asks where YWLS Bronx students will attend high school.

YWLS Bronx students have the opportunity to attend a high school of their choice through the High School Admissions process. Pending approval by the PEP, YWLS Bronx students may have the opportunity to remain in the X117 building to attend high school at YWLS Bronx.

⁴ Figure based on Unaudited Register as of October 31, 2014.

- Comment 55(e.) asserts that the DOE is allocating additional space to YWLS Bronx simply because it is part of the YWLS Network. This is untrue. The decision to propose the expansion of YWLS Bronx is detailed in the response to comment 55(a.) above. Many factors were considered throughout the decision-making process.

If approved, YWLS Bronx will be allocated space pursuant to the Footprint for the grade levels it serves.

- Comment 55(f.) asks how the scores of schools that screen applicants are compared with the scores of schools that do not screen applicants.

In order to meet the needs of all students, the DOE operates different types of schools with different admissions processes. Regardless of admissions, students take the standardized state ELA and math tests. As described throughout this public comment analysis, numerous factors were considered in the decision-making process, including qualitative and quantitative information, community needs, and priorities.

Changes Made to the Proposal

No changes have been made to this proposal.