

Public Comment Analysis

Date: February 24, 2015

Topic: The Proposed Opening and Co-Location of a New Site of an Existing District 75 School P396K (75K396) with P.S. 181 Brooklyn (17K181) in Building K181 Beginning in 2015-2016

Date of Panel Vote: February 25, 2015

Summary of Proposal

On January 9, 2015, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to open and co-locate a new site of P396K (75K396, “P396K”), an existing District 75 school, in building K181 (“K181”), to be called “P396K@K181,” beginning in the 2015-2016 school year. K181 is located at 1023 New York Avenue, Brooklyn, NY 11203 in Community School District 17 (“District 17”). If this proposal is approved, P396K@K181 will serve middle school students, and will be co-located with P.S.181 Brooklyn (17K181, “P.S.181”), an existing zoned school serving students in kindergarten through eighth grades and offering a pre-kindergarten program. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias.

Based on a projected increased need for District 75 seats, the District 75 Placement Office is seeking to increase its capacity to serve students who have been classified as having autism, intellectual disabilities and/or multiple disabilities within Brooklyn, and offer District 75 middle school students who reside in District 17 a program placement that is within their school community and potentially closer to their home. Since the 2011-2012 school year, District 75 enrollment has grown by over 1,300 students. Approximately 500 eligible District 75 students who live within the geographical confines of District 17 currently must travel outside of the district to attend a District 75 program. Additionally, there is currently only one District 75 middle school program located within District 17. Thus, the DOE has identified a need for additional District 75 seats in District 17. If this proposal is approved, the DOE will open a new site for an existing District 75 school, P396K, beginning in the 2015-2016 school year. P396K@K181 will serve a range of students across grades six through eight who are classified as autistic, intellectually disabled or multiply disabled under an Individualized Education Program (“IEP”). P396K@K181 is projected to serve eight sections of students in self-contained sections in 12:1:4, 12:1:1, 8:1:1, or 6:1:1 classroom settings (ratio of students: teacher: paraprofessional). Students are placed in District 75 programs based on their individual needs and recommended special education services, and are referred to District 75 during a period that extends into summer. Students may be served in this program throughout the course of their education. K181 also houses an Adult and Continuing Education program that operates after school hours. This proposal is not expected to impact the continued siting of that program in K181.

If approved, this proposal will add approximately 48-96 District 75 self-contained seats in K181 for District 75 middle school students who are classified as autistic, intellectually disabled or multiply disabled on their IEPs. These additional seats are necessary to meet the increased demand for District 75 self-contained programming in Brooklyn and to increase access to such programs in District 17 in particular.

According to the 2013-2014 Enrollment, Capacity, Utilization Report (“Blue Book”), K181 has a target capacity to serve 1,358 students. (The concept of “target capacity” is explained below in Section II of the EIS). During the 2014-2015 school year the building is serving 984 students, yielding an estimated building utilization rate of 72%. This means that the building is “under-utilized” and has space that could be used more efficiently to accommodate additional students. If this proposal is approved, P396K@K181 will open in September 2015 serving eight self-contained sections of middle school students, for a total of approximately 48-96 students. Therefore, it is projected that there will be approximately 989-1,127 students served in K181, yielding an estimated building utilization rate of

73%-83%. If this proposal is approved, there will be sufficient space in K181 to accommodate P.S.181 and P396K@K181.

The details of this proposal have been released in an EIS, which can be accessed here:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2014-2015/February2015SchoolProposals>.

Copies of the EIS are also available in the main offices of P.S. 181 and P396K.

Summary of Comments Received

Extensive public engagement was conducted by the DOE in the course of creating this proposal which included:

- Meeting with members of the District 17 Community Education Council (“CEC 17”) on October 21, 2014 to discuss district-wide needs, particularly the need for additional District 75 seats to meet students’ needs.
- Convening a Community Needs Assessment Forum on November 13, 2014, which included representatives from elected officials, Brooklyn CECs and District Presidents Councils at which District 17 planning needs and priorities in Brooklyn were discussed, including the need for additional District 75 programs.
- Meeting with members of the P.S. 181 School Leadership Team on December 17, 2014 to discuss the need for additional District 75 programs in District 17 and a potential proposal for a new District 75 program in K181. The District 17 Superintendent as well as representatives from CEC 17 and the Citywide Council on District 75 were also in attendance.
- Conducting a walkthrough of K181 with DOE Senior Leadership on January 5, 2015. On that day, DOE leadership members met with the principal and School Leadership Team members of P.S. 181, and a CEC 17 representative to further discuss the proposal, listen to questions and concerns from the school communities, and determine whether significant logistical or other concerns would prevent the implementation of this proposal if approved by the Panel for Educational Policy (“PEP”).
- Convening a community meeting at K181 on January 21, 2015, at which members of the P.S. 181 school community had opportunity to ask proposal specific questions and receive responses from DOE representatives. Approximately 25 people attended this meeting, including CEC 17 President Nicole Job and CEC IEP parent representative, Tameka Carter.

The DOE also held a joint public hearing regarding this proposal at the K157 building on February 10, 2015. At that meeting, interested parties had an opportunity to provide input on the proposal. Approximately 30 members of the public attending the hearing. There were eight (8) speakers. Individuals present at the meeting included: CEC 17 1st Vice President Kenneth Wright and CEC 17 IEP Parent Representative Tameka Carter; PEP Member Lori Podvesker; P.S. 181 Principal Heather Lawrence; P396K Principal Nira Schwartz-Nyitray; CCD75 Representative Celia Green; P396K Parent Association President and School Leadership Team (“SLT”) member Yvonne Oglesby, and her son Avonte Oglesby; Title I District and Upper State Representative Claudette Agard; and Estelle Acquah and Greg Whitten from the DOE’s Office of District Planning.

The following comments and remarks were made at the joint public hearing on February 10, 2015:

1. Heather Lawrence, principal at P.S. 181 stated that the proposed co-location offers P.S. 181 the chance to grow as a school community and will offer opportunities for partnerships and collaboration with District 75.
 - a. She noted that P.S. 181 is a zoned school, does not discriminate against anybody, and is open to serving everyone. She further noted that as members of a community in District 17, P.S. 181 is obligated to serve those from their own community, including students from District 75, and she wants to welcome every member of the District 17 community that has a need and has a child.
 - b. She also shared that she started in the DOE working with special education populations, and she has had the responsibility to help new schools move into established spaces. She has experience preparing space for people who have needs and have a desire to learn.
2. Nira Schwartz-Nyitray, principal at P396K, expressed support for the proposal.

- a. She expressed that this is the right thing to do and that she is very excited. She noted that roughly 500 students in District 17 must travel outside of the district to attend specialized programming in District 75 programs, so this will allow more students to stay closer to home.
 - b. She expressed that in addition to serving those in need, there are benefits to co-locating the programs, as District 75 brings expertise on providing special education services and that P396K enjoys collaboration and sharing of resources.
 - c. She addressed concerns about blending results of academic performance and progress reports between the two schools, noting that each school receives its own reviews and that the scores do not mix with one another.
3. Kenneth Wright, CEC 17 1st Vice President, commented as follows:
 - a. He fully supports the proposal.
 - b. The CEC had a discussion about this proposal, in which they discussed the following:
 - i. There is only one District 75 middle school in District 17.
 - ii. P.S. 181 is the perfect place for a District 75 school.
 - iii. This proposal is giving better opportunity in District 17 for children with autism, children with disabilities, and children with special needs.
 - iv. There are special education students in P.S. 181, and this partnership opens the opportunity to share resources and expertise.
 4. Tameka Carter, CEC IEP parent representative, commented as follows:
 - a. Speaking on behalf of CEC 17 President Nicole Job, and the entire CEC 17, she is in full support of this proposal because it will allow parents in need of District 75 services an option in the community, there have been no major issues with District 75 middle school programs in District 17, and K181 has space to accommodate this proposal.
 5. Celia Green, CCD75 representative, commented as follows:
 - a. She is in full support of this proposal, as District 75 students that live in District 17 deserve an option close to home.
 - b. She has four (4) children on the autism spectrum, has been a District 75 parent for 20 years, and lives in the K181 neighborhood. If a program such as this in the proposal had previously existed, she may not have had to bus her kids over one (1) hour away for school.
 - c. District 75 is a placement based program, where enrollment won't jump precipitously.
 6. Avonte Oglesby, student in P396K, commented as follows:
 - a. He has been happy in P396K and likes studying in P396K.
 7. Yvonne Oglesby, P396K Parent Association President and SLT Member, commented as follows:
 - a. She is in full support of the proposal, as she has seen her son, Avonte, grow in P396K. By co-locating the two programs, there is an opportunity to bridge the divide between District 75 students and other students, and this will foster a more inclusive environment in both schools.
 8. Claudette Agard, Title I District and Upper State representative, commented as follows:
 - a. When she heard that P.S. 181 was being considered to co-locate a District 75 program, she thought, "this is great and this is a great place to be." She is very confident that this will be a good relationship. She is excited about this and is personally in support of it, as is the CEC. She is looking for this to be a model and shining star program.

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

No additional comments were issued to the DOE in response to this proposal.

Analysis of Issues Raised, Significant Alternatives Proposed

Comments 1(a), 2(a-b), 3(a), 4, 5(a), and 6-8 are in favor of the proposal and do not require a response.

Comments 1(b), 2(c), 3(b), and 5(b-c) are explanatory in nature and do not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.