

Public Comment Analysis

Date: October 29, 2013

Topic: The Proposed Expansion and Extension of the Co-Location of Corona Arts and Sciences Academy (24Q311) with Civic Leadership Academy (24Q293), Pan American International High School (24Q296), Voyages Preparatory (24Q744), and Queens Transition Center (75Q752) in Elmhurst Educational Campus in Building Q744 for the 2015-2016 School Year, and the Proposed Re-siting and Co-location of M.S. 311 with a District 75 School in New Building Q311 Beginning in the 2016-2017 School Year

Date of Panel Vote: October 30, 2013

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to extend the co-location of Corona Arts and Sciences Academy (24Q311, “M.S. 311”) and expand the scope of the co-location of M.S. 311 by adding eighth grade in Elmhurst Educational Campus building Q744 (“Q744”), located at 45-10 94th Street, Queens, NY 11373 in Community School District 24 (“District 24”), for the 2015-2016 school year. M.S. 311 is a new district middle school that will be co-located temporarily in Q744 with Civic Leadership Academy (24Q293, “Civic Leadership”), an existing high school serving students in grades nine through twelve; Pan American International High School (24Q296, “Pan American”), an existing international high school serving students in grades nine through twelve; Voyages Preparatory (24Q744, “Voyages”), an existing transfer school serving students in grades nine through twelve; and P752@Q744, one site of a multi-site District 75 (“D75”) school (Queens Transition Center, “75Q752”) serving students in grades nine through twelve. After the 2015-2016 school year, M.S. 311 would be re-sited and co-located with a yet-to-be determined D75 school (“75QTBD”) in new building Q311 (“Q311”), which is designed to accommodate a middle school and a D75 school and is expected to be completed for occupancy by the 2016-2017 school year. 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 December 20, 2012 the Panel for Educational Policy (“PEP”) approved the temporary co-location of M.S. 311 in the Q744 building, and the re-siting and co-location of M.S. 311 with a D75 school in new building Q311, located at 97-11 44th Avenue, Queens, NY 11368 beginning in the 2015-2016 school year. Under the original proposal approved by the PEP, M.S. 311 was expected to be co-located for the 2013-2014 and 2014-2015 school years only. After two years in Q744, M.S. 311 would be re-sited and co-located with 75QTBD in new building Q311, which is designed to accommodate a middle school and a D75 school, and was expected to be completed for occupancy by the 2015-2016 school year. This co-location was identified as temporary because M.S. 311 would be re-sited to new building Q311, where it would grow to scale as a middle school serving students in grades six through eight.

However, the construction of Q311 has been delayed, and Q311 is now expected to be complete for the 2016-2017 school year, rather than the 2015-2016 school year. Therefore, the DOE is proposing that M.S. 311 stay in Q744 for one additional year, and expand in Q744 to serve students in sixth through eighth grade in 2015-2016 as it continues to phase in. M.S. 311 would be re-sited to Q311 for the 2016-2017 school year.

M.S. 311 is a new zoned middle school that will open in September 2013 in Q744, where it will be co-located with Civic Leadership, Pan American, Voyages, and P752@Q744. In 2013-2014, M.S. 311 is projected to enroll 81 students in sixth grade. In 2014-2015, M.S. 311 will serve approximately 150-170 students in sixth and seventh grades. If this proposal is approved by the PEP, M.S. 311 will continue to be co-located in Q744 with Civic Leadership, Pan American, Voyages, and P752@Q744 and will expand to serve approximately 225-255 students in sixth through eighth grades in the 2015-2016 school year. In 2016-2017, M.S. 311 will move to a long-term location in new building Q311, where it will be able to enroll a larger cohort of sixth-grade students for the 2016-2017 school year and beyond. In 2018-2019, when the school achieves “full scale” in building Q311, it will serve approximately 780-810 students in sixth through eighth grades.

Civic Leadership is a limited unscreened high school that is serving approximately 441 students in ninth through twelfth grades during the 2013-2014 school year.

Pan American is a screened international high school that is serving approximately 338 students in ninth through twelfth grades who have lived in the United States for four years or fewer at the time of admission to high school and whose home language is not English. International schools are designed to provide quality education for recently arrived immigrant students through a unique educational model.

Voyages is a transfer school that is serving approximately 250 students who are 16 years of age or older. Transfer schools are small, academically rigorous high schools designed to re-engage students who have dropped out of high school or have fallen behind. These schools are designed to create a personalized learning environment and to provide students with connections to college. Students graduate with a high school diploma from the transfer school they attend.

P752@Q744 is serving approximately 53 students in grades nine through twelve who are classified as intellectually disabled (“ID”) under an Individualized Education Program (“IEP”) in Self-Contained (“SC”) sections in 12:1:1 classrooms settings (ratio of students: teacher: paraprofessional). Students are placed in D75 programs based on their individual needs and recommended special education services and are referred to D75 during a period that extends into summer.

Q744 has the capacity to serve 1,482 students. In the 2013-2014 school year, the building is serving approximately 1,163 students, yielding a utilization rate of 78%. This means that the building is “underutilized” and has space to accommodate additional students. If this proposal is approved, there will be sufficient space to accommodate all schools in Q744. In M.S. 311’s final year of co-location in 2015-2016, the Q744 building would serve approximately 1,251-1,395 students, yielding a building utilization rate of 84%-94%.

If re-siting M.S. 311 to new construction after the 2015-2016 school year is not feasible for any reason, the DOE will re-assess the space at Q744 and, if appropriate, extend the co-location, or propose an alternative siting plan. The DOE would issue a separate Educational Impact Statement (“EIS”) describing any alternate plan for M.S. 311 or Q744. The details of this proposal have been released in an Educational Impact Statement (“EIS”), which can be accessed here:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/Oct30SchoolProposals>.

Copies of the EIS are also available in the main offices of M.S. 311, Civic Leadership, Pan American, Voyages, and P752@Q744.

Summary of Comments Received

A joint public hearing regarding the proposal was held at Elmhurst Educational Campus on October 1st, 2013. At the hearing, interested parties had the opportunity to provide input on the proposal. Approximately 27 members of the public attended the hearing and 10 people spoke. Present at the meeting were District 24 Community Superintendent Madelene Chan; District 24 Community Education Council (“CEC 24”) representatives Connie Partinico and Denise Vazquez; Citywide District 75 Council representative Gloria Corsino; Beth Hert, IA Principal of M.S. 311; Nicholas Bleiberg, IA Principal of Voyages; Phuong Nguyen, Principal of Civic Leadership; Minerva Zanca, Principal of Pan American; Gilberto Gomez representing the Pan American School Leadership Team; Donna Atkins representing the Queens Transition Center School Leadership Team; and Jillian Roland and Dean Guzman from the Office of Portfolio Management.

The following comments and remarks were made at the joint public hearing on October 1, 2013:

1. Principal Phuong Nguyen representing Civic Leadership asked about long term plans for Elmhurst Educational Campus:
 - a. She thanked the Principals in the building for a seamless, peaceful, and safe addition of M.S. 311 to the campus.
 - b. She requested that the DOE work on a long-term solution with stakeholders of the campus to address under-utilized space after M.S. 311’s temporary co-location.
2. Principal Bleiberg representing Voyages expressed opposition to co-locations in general:
 - a. He stated that Voyages is happy to share space and make this co-location work for the whole campus; however, he stated that co-location is a flawed idea, and that it was a flawed idea putting young children on a floor with Voyages.
 - b. He stated that schools cannot be quantified by how much space they use, and that schools may want to enhance their missions on the campus, which should be factored into decisions.
3. Principal Zanca representing Pan American expressed concern about the co-location:
 - a. She acknowledged that the Elmhurst Campus is high-functioning and safe because the Building Council works hard to make it that way.
 - b. She stated that her children will be squeezed to one side of the building next year, when M.S. 311 moves onto her floor, and that this will create an unsafe and uncomfortable situation.
 - c. She expressed concern that her school will not have access to the locker rooms and bathrooms on her floor.
 - d. She expressed concern about losing space needed to expand her growing programs.
4. Gilberto Gomez representing the Pan American School Leadership Team expressed concern that the co-location will affect the behavior of the students, and put young children in danger.
5. Donna Atkins representing P752@Q744 expressed concern about the impact of the co-location on P752@Q744’s space.
6. Beth Hert representing M.S. 311 expressed support for the co-location of M.S. 311 in Building Q744:
 - a. She stated that she initially had concerns about co-location, but that M.S. 311 has had the most successful opening the school could have asked for. She added that she believes this is a safe space for all students, including middle school students.
 - b. She stated that the Building Council can work out any co-location issues moving forward.
7. Gloria Corsino representing the Citywide District 75 Council expressed concern with the formula used to determine adequate space.

8. Connie Partinico representing CEC 24 stated that she will take feedback from the hearing to the CEC.
9. James Vasquez representing Queens High Schools for the UFT expressed opposition to the co-location:
 - a. He stated that the DOE has made a mistake of co-locating another school in the community.
 - b. He stated that the DOE doesn't listen to the community and holds a hearing only because of the law.
 - c. He stated that the community will have to fix the mess made under this administration.
10. A commenter expressed concern about the co-location stating that Elmhurst Educational Campus does not have a gym, P752@Q744 does not have an auditorium, and that co-location comes at a cost.

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

11. A commenter asked for information about the proposal.
12. The Queens High School Presidents' Council submitted a letter requesting that the PEP vote against co-locations in Queens:
 - a. The letter asserted that co-locations are being rushed and do not adequately engage communities.
 - b. The letter expressed support for construction of new schools with additional seats.
 - c. The letter expressed concern that the cost of additional administrative staff for a new school takes funding and classrooms away from students.
 - d. The letter expresses concern that small schools have a limited number of academic and extra-curricular offerings.
 - e. The letter encourages the DOE to assess the impact of co-locations on students.

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

Comments 1(a), 3(a), and 6(b) express support the Elmhurst Educational Campus Building Council and do not require a response.

Comment 6(a) expresses support for the co-location of M.S. 311 in Building Q744 and does not require a response.

Comment 8 expresses that feedback from the hearing will be taken to CEC 24, and does not require a response.

Comment 12(d) does not relate to this proposal and thus does not require a response.

Comment 1(b) concerns the long term plan for under-utilized space in building Q744.

As mentioned in the EIS, the DOE anticipates that building Q744 will have excess space after the co-location of M.S. 311. The DOE would assess long-term options for any excess space in the building. The DOE would issue a separate EIS in accordance with Chancellor's Regulation A-190 describing any plans for the use of excess space in Q744.

At this time, there are no proposed additional uses for the Q744 building.

Comment 2(a), 3(b), 4, 9(a,c), 10, and 12(c,e) express concerns about co-locations generally, the safety of this co-location as well as concerns about the negative impact of co-location on the success of schools and

students in the building.

Given the finite number of buildings available in New York City, the DOE attempts to use all of its school buildings as efficiently as possible. Co-location is therefore very common in New York City schools as there are not sufficient school buildings to allow each school organization to operate its own building. In 2013-2014, 45% of all DOE-operated buildings are home to co-located school organizations and District 79 programs. A co-location means that two or more school organizations are located in the same building. While they share common spaces like auditoriums, gymnasiums, and cafeterias, each school is allocated particular classrooms and spaces for its own students' use.

Due to space limitations, it is not unusual for varying grade levels to be co-located together. Many school buildings successfully house co-located schools, such as the I.S. 275 building in Brooklyn which houses Kappa V, a middle school, Leadership Preparatory Brownsville Charter School, an elementary school, and two transfer schools Metropolitan Diploma Plus High School and Brooklyn Democracy Academy or the the Metropolitan Avenue Campus in Queens.

In regards to the concerns about safety, 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 the changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when 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.

In addition, the DOE makes available the following supports to schools around safety and security:

- Providing "Best Practices Standards for Creating and Sustaining a Safe and Supportive School," as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and support to Children's First Network (CFN) Safety Liaisons;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

The DOE is confident that the principals in Elmhurst Educational Campus will continue to create a collaborative and mutually respectful environment for all students, staff, and faculty members in Elmhurst Educational Campus. At the joint public hearing, representatives of each school community expressed support for the Building Council and its ability to maintain a safe campus.

Comment 3(c) concerns the locker room and bathroom on the third floor.

The Building Council for Elmhurst Educational Campus worked with the Office of Space Planning to determine a plan for the use of space in Q744. As part of this plan, Pan American will have access to the third floor lockers and bathrooms during the temporary co-location. 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. The intention is not to be punitive to any one

group of students. If the assignment of specific bathrooms is not working or is inadequate, the Building Council can discuss an alternative arrangement.

Comments 2(b), 3(d), 5, and 7 concern the DOE's assessment of space in the building; comments 3(d) and 5 concern specifically the impact of this proposal on the space available to Pan American and P752@Q744.

As stated in the EIS, Elmhurst Educational Campus ("Q744") has been identified as an under-utilized building and the building has capacity to accommodate Civic Leadership, Pan American, Voyages, P752@Q744, and M.S. 311 during the extended temporary co-location of M.S. 311. Q744 has the capacity to serve 1,482 students. In the 2013-2014 school year, the building is serving approximately 1,163 students, yielding a utilization rate of 78%. In M.S. 311's final year of co-location in 2015-2016, the Q744 building would serve approximately 1,251-1,395 students, yielding a building utilization rate of 84%-94%. Therefore, the building has adequate capacity to accommodate the expansion and extension of the co-location of M.S. 311 alongside Civic Leadership, Pan American, Voyages, and P752@Q744. Projected enrollment figures and anticipated utilization rates for Q744 are based on target capacity data from the 2011-2012 Blue Book and enrollment data from the 2013-2014 budget register projections. This methodology is consistent with the manner in which the DOE conducts planning and calculates space allocations and funding for all schools.

Further, if this proposal is approved, there will be sufficient space to accommodate Civic Leadership, Pan American, Voyages, P752@Q744, and the continued co-location of M.S. 311 pursuant to the Citywide Instructional Footprint (the "Footprint"), throughout the period in which M.S. 311 phases in. Please visit the DOE's Web site to access the Footprint, which guides space allocation and use in City schools: http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

The Footprint sets forth the baseline number of rooms that should be allocated to a school based on the grade levels served by the school and number of classes per grade. For existing schools, the Footprint is applied to the current number of classes and class size a school has programmed and is confirmed by a walk-through of the building by the Borough Director of Space Planning and the school's principal.

For grades six through twelve, the Footprint assumes that students move from class to class and that classrooms should be programmed at maximum efficiency. The Footprint does not require that every teacher have his or her own designated classroom. Principals are asked to program their schools efficiently so that classrooms can be used for multiple purposes throughout the course of the school day.

The Footprint allocates the number of baseline classrooms for student support services, resource rooms, and administrative space based on the grades a school serves and its enrollment at scale. Any space remaining beyond the baseline shall be allocated equitably among the co-located schools. In determining an equitable allocation, the DOE may consider factors such as the relative enrollments of the co-located schools, the instructional and programmatic needs of the co-located schools, and the physical location of the excess space within the building.

As mentioned in the EIS, there will be excess space in building Q744 above each school's footprint during each year of the temporary co-location. In reference to comments 3(d) and 5, both Pan American and P752@Q744 will continue to operate above footprint:

- Per the Footprint, Pan American would be allocated a baseline of 13 full-size rooms, 1 half-size room, and 3.0 FSE of administrative spaces. Pan American's planned allocation is 14 full-size rooms, 3 half-size rooms, 3 quarter-size rooms, and 3.0 FSE of designed administrative space due

to building configuration and as per the plan determined by the Building Council and the Office of Space Planning.

- Per the Footprint, P752@Q744 would be allocated an adjusted baseline of 7 full-size classrooms, 1 half-size instructional room, and 1.5 FSE of administrative spaces. The footprint for P752@Q744 was adjusted due to the shortage of half-size rooms available in its location in the building. P752@Q744's planned allocation is 10 full-size rooms, 1 half-size room, 3 quarter-size rooms, and 1.5 FSE of designed administrative space.

As stated in the EIS, the proposed co-location is not expected to impact future student enrollment, instructional programming, or the admissions process to the schools currently co-located in building Q744.

Comments 9(b), and 12(a) concern the public review process for this proposal; and comment 11 asks for information about the proposal.

The DOE appreciates all feedback from the community regarding a proposal. The details of this proposal have been released in an EIS, which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/Oct30SchoolProposals>. When the EIS was issued, it was made available to the staff, faculty, and parents at M.S. 311, Pan American, Civic Leadership, Voyages, and P752@Q744 on the DOE's Web site, and in each school's respective main office. In addition, the DOE dedicates a proposal-specific website and voicemail to collect feedback on this proposal. Furthermore, all schools' staff, faculty and parent communities were invited to the Joint Public Hearing to solicit further feedback. The DOE takes the community feedback into consideration and addresses all questions and concerns in a Public Comment Analysis that is posted on our website prior to the PEP vote.

Comment 12(b) concerns the construction of new schools with additional seats.

As mentioned in the EIS, by temporarily co-locating M.S. 311 in Q744, the DOE seeks to alleviate overcrowding in Corona/Elmhurst and add needed capacity for zoned students to this area. This proposal to expand and extend the co-location of M.S. 311 in Q744 would allow M.S. 311 to remain in Q744 for the 2015-2016 school year while building Q311 remains under construction, and would allow M.S. 311 to be re-sited to Q311 for the 2016-2017 school year when the construction of building Q311 is expected to be completed.

New building Q311 is expected to open in September 2016, adding an anticipated 785 middle school seats, including D75 seats, to the Corona/Elmhurst neighborhood in District 24.

Changes Made to the Proposal

No changes have been made to this proposal.