

Public Comment Analysis

Date: October 29, 2013

Topic: The Proposed Opening and Co-location of New District Elementary School 31R010 with Existing School P.S. 16 John J. Driscoll (31R016) in Building R016 Beginning in 2014-2015

Date of Panel Vote: October 30, 2013

Summary of Proposal

On September 13, 2013, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to open and co-locate a new zoned district elementary school 31R010 (“31R010”) with existing district elementary school P.S. 16 John J. Driscoll (31R016, “P.S. 16”) in building R016 (“R016”) beginning in the 2014-2015 school year. Building R016 is located at 80 Monroe Avenue, Staten Island, NY 10301, in Community School District 31 (“District 31”). If this proposal is approved, 31R010 will be co-located with P.S. 16 and will share an elementary school zone with P.S. 16 and P.S. 74 Future Leaders Elementary School (31R074, “P.S. 74”), which is in building R831 (“R831”) located at 211 Daniel Low Terrace, Staten Island, NY 10301. Future students in that shared residential zone will have admissions priority to all of the schools in the zone: the new zoned elementary school, 31R010, and the existing shared-zoned elementary schools, P.S. 16 and P.S. 74, in accordance with Chancellor’s Regulation A-101. If this proposal is approved, 31R010 will begin enrolling kindergarten students in 2014-2015 and will add one grade per year until it reaches full scale and serves students in kindergarten through fifth grades in 2019-2020.

Concurrently, the DOE is planning to reduce the enrollment at P.S. 16 beginning in September 2014 over a period of six years. Beginning in September 2014, P.S. 16 will enroll 70-80 kindergarten students, as opposed to the 100-175 kindergarten students it has enrolled in recent years. This reduction of P.S. 16’s enrollment will enable 31R010 to open in building R016 and grow to scale. The DOE does not anticipate reducing P.S. 16’s enrollment if this proposal to co-locate 31R010 is not approved.

P.S. 16 will admit fewer kindergarten students after the end of the 2013-2014 school year and will continue to admit a reduced number of kindergarten students in subsequent years. By 2019-2020, enrollment at P.S. 16 will decrease by approximately 210-270 students so that, at scale, it will serve 456-516 students in pre-kindergarten through fifth grades.

According to the 2011-2012 Enrollment, Capacity, Utilization Report (“Blue Book”), R016 has a target capacity of 827 students. The building is projected to serve 726 students, yielding a building utilization rate of 88%. The DOE believes there is sufficient space in building R016 to accommodate 31R010 and P.S. 16 over the course of this proposal.

If this co-location proposal is approved, 31R010 will gradually phase in to R016 while P.S. 16 simultaneously reduces its enrollment. The new school will serve students in kindergarten in the 2014-2015 school year and will add one grade level every year until the school reaches its full grade span of kindergarten through fifth grades in the 2019-2020 school year, serving approximately 270-330 students. In 2019-2020, once P.S. 16 has completed its enrollment reduction and 31R010 is at full scale, it is projected to serve approximately 726-846 students in R016, thereby yielding an estimated building

utilization rate of approximately 88%-102%.

Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation.

The proposed opening and co-location of 31R010 in building R016 is part of the DOE's central goal to create new school options that will better serve future students and the community at large and to provide another option in the R016 building. Future students in that shared residential zone will have admissions priority to all of the schools in the zone: the new zoned elementary school, 31R010, and the existing shared-zoned elementary schools, P.S. 16 and P.S. 74, in accordance with Chancellor's Regulation A-101.

If this proposal to co-locate 31R010 is approved, the elementary school seats that will be lost as a result of the enrollment reduction at P.S. 16 will be largely recovered by the new seats created by the opening of 31R010. 31R010 will provide a new educational option for families in District 31.

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 office of P.S. 16.

Summary of Comments Received

A joint public hearing regarding the proposal was held at P.S. 16 on October 25, 2013. At the hearing, interested parties had the opportunity to provide input on the proposal. Approximately 157 members of the public attended the hearing and 23 people spoke. Present at the meeting were: District 31 Superintendent Jessica Jenkins; District 31 Community Education Council ("CEC 31") representatives Sam Pirozzolo and LaTonja McMillan; Vincenza Gallassio, Principal of P.S. 16; P.S. 16 School Leadership Team ("SLT") representatives Tina Collucci, Yajaira Garcia, Berline Eva Monroe, Giselle Heffran, C. Conevery, Nieves Pavia, Donna-Jean Amerosa, and Kathy Bayer; Councilmember Debi Rose; Assemblyman Matt Titone; Senator Diane Savino; and Meg Barboza and Emily Ades from the Office of Portfolio Management.

The following comments and remarks were made at the joint public hearing on October 25, 2013:

1. Sam Pirozzolo, representing CEC 31, stated that he is opposed to co-locations.
 - a. He said that a placement plan for the new school will not be decided on until the Panel for Educational Policy ("PEP") approves the proposal and that he does not approve of a plan that will take equipment, air conditioners, or smart boards from P.S. 16.
 - b. He expressed that he is in support of expanding P.S. 16 to serve grades K-8 in order to continue the elementary school dual-language program in four schools in Staten Island.
2. Tina Collucci representing the P.S. 16 SLT expressed opposition to the proposal and suggested that a better idea would be to expand the dual-language program that started 9 years ago at P.S. 16 and other elementary school locations in Staten Island to serve grades 6-8.
3. Kathy Bayer representing the P.S. 16 SLT stated that she is opposed to the co-location.
 - a. She expressed concern that reducing class sizes should take priority over opening a new school.

- b. She stated that P.S. 16 has shown progress particularly with the English Language Learners (“ELLs”) and lowest third.
 - c. She expressed that P.S. 16 needs more funding and resources.
 - d. She stated that familiarity is one of the major components of safety and that staff will not know all the students in the building.
4. Donna Jean Amarosa representing the P.S. 16 SLT stated that she is opposed to the proposal due to the fact that the smart boards and technology upgrades in the building will now be used by the new school and that funds have been wasted.
5. Giselle Heffran and Nieves Pavia both representing the P.S. 16 SLT stated that they were opposed to the co-location proposal and would support the expansion of P.S. 16 to serve grades K-8 so that the dual-language program can continue.
6. Assemblyman Matt Titone stated that he is opposed to the proposal.
 - a. He objected to the public meeting being held on a Friday night and said this prevents people who observe the Sabbath from attending.
 - b. He said that he supports a plan to expand the dual-language program to serve K-8.
7. Senator Diane Savino expressed opposition to the proposal.
 - a. She said that Mayor Bloomberg is trying to “govern from the grave” and that the next administration should have a say in the decisions for schools for the 2014-15 school year.
 - b. She stated that she supports the parents’ plan to expand the dual-language program to serve K-8.
8. Councilmember Debi Rose read a statement conveying disapproval of the co-location proposal.
 - a. She stated that co-locations and enrollment reductions mean shared resources and reduced staff.
 - b. She stated that she does not support a plan that will not allow P.S. 16 continued use of the air-conditioned rooms on the 3rd floor.
 - c. She noted that co-locations result in limited time in shared spaces such as the gymnasium and cafeteria.
 - d. She said that reduced class sizes should be prioritized over a new school siting.
 - e. She stated that P.S. 16 is a bi-lingual community and should not be penalized for not mobilizing opposition to the proposal as the I.S. 2 community did.
 - f. She expressed that she supports a plan to expand the dual-language program to serve K-8.
9. Multiple commenters were opposed to the co-location because they believe that a better plan would be to expand P.S. 16 to a K-8 school and therefore provide the opportunity for the dual-language programs at P.S. 16, P.S. 44, P.S. 19, P.S. 31, and P.S. 22 to have an articulation site for the middle school grades.
10. Multiple commenters were against the co-location because it will take space away from P.S. 16.
 - a. The science lab is an integral part of the STEM curriculum and should not be shared.
11. Multiple commenters expressed general opposition to the co-location.
 - a. Multiple commenters expressed concerns about safety in co-located buildings, particularly because two schools are already sharing the facilities.
 - b. Multiple commenters expressed concerns related to the impact on the school culture.
 - c. One commenter stated that the co-location will reduce the Community Service program at P.S. 16.
12. Multiple commenters stated that they were opposed to the proposal with regard to the targeted enrollment reduction.
 - a. They stated that the reduced enrollment will result in staff being excessed.
 - b. Commenters said that this will cause further budget cuts and a drain to the funding at P.S. 16.

13. One commenter stated that the DOE does not listen to community feedback.
 - a. He stated that the PEP will not have access to the comments from the Joint Public Hearing prior to the vote on Monday, October 28th and the reason why the hearing was planned for a Friday night was in order to limit attendance.

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

14. A commenter stated that instead of co-locating two schools, the early childhood grades should be split from the 3rd-5th grades under two managements in order to prevent schedule interference.

The DOE received the following comment which does not directly relate to the proposal.

15. A commenter stated that the DOE claimed that they did not have funding to provide two days off for a religious holiday.

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

Comments 1(a), 4, and 8(b) express opposition to the proposed co-location in terms of the specific decisions around placement of 31R010 within the R016 building.

The assignment of specific instructional and shared spaces between district schools proposed for co-location does not occur until the proposal has been approved by the PEP.

As in other situations where schools are co-located, these decisions will be made by the Building Council, consisting of principals from all co-located schools, in conjunction with the DOE's Office of Space Planning. 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.

Comments 1(b), 2, 5, 6(b), 7(b), 8(f), and 9 express opposition to the proposal because they support a plan to expand P.S. 16 to serve grades K-8 in order to expand the dual-language program to serve students enrolled in dual-language elementary schools in Staten Island.

The DOE appreciates the community's feedback on exploring the possibility of expanding the dual-language program in Staten Island at an appropriate location. At this time it is not feasible for P.S. 16 to apply for grade reconfiguration for 2014-2015 as the process is now closed. All schools must apply for a grade reconfiguration through an application process administered by the DOE. The application will be assessed through careful analysis of resources (budget and physical space), school performance, demographic need, and enrollment demand. The Office of New Schools in the Division of Portfolio Planning (DPP) manages the process for determining any changes to schools' current grade levels in consultation with the Office of Portfolio Management, Office of Student Enrollment, Community Superintendents, Children First Networks, Clusters, Community Education Councils, District Leadership Teams and other members of school communities.

All grade reconfigurations are assessed via the following decision factors: school quality, school planning, physical space, demographic need, impact on enrollment, and community input.

Comments 3(a) and 8(d) assert that space in R016 should be used to support smaller class sizes.

Class size is primarily determined by how principals choose to program students at their school within their budget. Thus, no particular proposal, in and of itself, necessarily impacts class size. The Citywide Instructional Footprint relies upon the current programming at a school (number of sections) to determine the baseline footprint allocation. Decisions to co-locate schools are not based solely on the utilization figures in the Blue Book. The DOE also considers the total number of classrooms in the building and the number of sections currently programmed at all schools in the building or projected to be programmed to determine the availability of excess space and the baseline footprint for each school.

The DOE acknowledges that there are some members of the school's community that are opposed to the proposal, and/or prioritize smaller class sizes. However, we believe that co-locating a new school will best serve the families in this community.

Comment 3(b) expressed opposition to the co-location based on the fact that P.S. 16 has shown performance growth.

The DOE commends and acknowledges the administration, the staff, and students at P.S. 16 for their hard work towards creating a positive change in the school. However, the DOE believes that the students in this community would be well-served by an additional school option. P.S. 16 received overall C grades on its Progress Report in 2011-2012 for the third consecutive year. Additionally, in 2010-2011 and 2011-2012, the school received D grades in both Student Performance and School Environment.

Further, in 2011-2012, P.S. 16 ranked in the 9th percentile citywide for both Math and English Language Arts ("ELA") proficiency.

At this time, the DOE believes that reducing the enrollment of P.S. 16 beginning in September 2014 and providing a new option for elementary school students in the R016 building will benefit current and future students at P.S. 16. The enrollment reduction is intended to provide an opportunity for students currently attending P.S. 16 to improve by narrowing the focus to a smaller number of students, and to allow for a new school option to develop in building R016.

Comments 3(c) and 8(a) expressed opposition to the proposal and noted that more resources and funding should be added to P.S. 16.

As noted in the EIS, all schools receive a basic operating budget that is allocated on a per pupil basis, based on current by the Fair Student Funding ("FSF") per capita allocation levels. Schools receive additional funds for students with disabilities, ELLs and those with other supplemental academic needs. As in all schools, principals have discretion over their budget and make choices about how to prioritize their resources. For example, schools may choose to hire fewer administrative staff (e.g. only a single assistant principal) freeing up dollars to be directed toward other priorities.

Comments 3(d) and 11(a) suggest that co-locations cause unsafe environments within the school building.

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; 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.

Comments 6(a) and 13(a) express that the DOE does not take community feedback into consideration and opted to hold the meeting on a Friday night to limit the number of people who can attend. Comment 13(a) also specifically refers to the process through which the PEP is notified of public comment.

The DOE appreciates all feedback from the community regarding a proposal. When the Educational Impact Statement was issued, it was made available to the staff, faculty and parents at P.S. 16 on the DOE's Web site, and at the school's main office. In addition, the DOE dedicates a proposal-specific website and voicemail to collect feedback on this proposal. The DOE did a presentation at the CEC's monthly meetings on July 8, 2013 and on October 16, 2013.

Furthermore, all schools' staff, faculty and parent communities are invited to the Joint Public Hearing to provide further feedback. Four different dates were offered to members of the CEC and SLT and Friday, October 25 was the date that worked for the all parties who are required to be at the joint public hearing.

The DOE considers all of the feedback received during the community engagement process and the Joint Public Hearing. In the past, in reviewing this community feedback, the DOE has both revised and withdrawn proposals in response to this input.

As a point of clarification, the PEP will meet on Wednesday, October 30, 2013 to vote on this proposal, and not on Monday, October 28, 2013 as the speaker mentioned. Prior to the vote, the analysis of public comment is made available to the PEP.

Comment 7(a) asserts the claim that Mayor Bloomberg is attempting to open schools after the end of his term.

These proposals, as well as the set that came before the October 30th PEP, represent a continuation of DOE's strategy to increase access to high quality schools in communities that need better options for the 2014-2015 school year.

This timeline is not new. The PEP already approved 23 proposals for September 2014 implementation during the May and June PEP meetings. The development of these 2014-2015 proposals reflects our extensive strategic planning to advance our proven strategy of bringing high quality district and charter schools online, as well as our desire to allow the maximum allotment of time for communities and educators to work towards their successful implementation.

Forward planning allots more time for:

- School/leaders to meet each other; and
- OSP to plan school placement and implement any needed facilities upgrades; and
- Charters to submit proposals for facilities matching; and
- Division of Facilities to review and conduct work on approved proposals.

Comments 8(c) and 10 (a) express opposition to the co-location proposal because the school building will be overcrowded and usage of the shared spaces will be limited.

All co-located schools are given proper support from the DOE's Office of Space Planning and each schools Children's First Network to form a Building Council. The Building Council, consisting of principals from all co-located schools, in conjunction with the DOE's Office of Space Planning makes specific decisions regarding the equitable distribution of the shared spaces such as the library, gymnasium, and cafeteria. The Office of Space Planning will also work with P.S. 16 to ensure that space is divided and shared proportionally, and that attention is paid to issues such as separate entrances and hallway usage, if deemed necessary.

As noted above, there is sufficient space in R016 for both P.S. 16 and 31R010 and there will be excess rooms in the building once 31R010 has fully phased in.

Although the DOE recognizes that people in the community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities in R016 will be able to create productive and collaborative partnerships.

Comment 8 (e) express that P.S. 16 is a bi-lingual community and should be given the same consideration to discontinue the proposal as I.S. 2 had.

Over the past several years I.S. 2 struggled to improve the educational outcomes of its students. The proposal to reduce I.S. 2's enrollment and co-locate a new middle school in the building was meant to allow the school to focus on a smaller cohort of students, while providing a new high-quality middle school option in the district. As with all proposals, we sought out and listened to feedback from the community. Through our community outreach we received comments that the school was making strides to improve, and the school's most recent performance data has backed up that feedback. We have decided not to reduce the school's enrollment at this time and are therefore withdrew the proposal to co-locate a new elementary school in the building. There have been several occasions this year where proposals have been withdrawn prior to a PEP meeting and decisions are best on what the DOE believes is best for a particular school community.

Comments 11(b and c) express opposition to the proposed co-location in terms of the impact on school culture and community service programs at P.S. 16.

The DOE is confident that the Principals of P.S. 16, P.S. 74 and 31R010 will continue to create a collaborative and mutually respectful environment for all students, staff, and faculty members in the co-located schools. 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.

As noted in the EIS, the DOE does not anticipate that this proposal will prevent P.S. 16 from continuing to offer any particular academic or extra-curricular program or partnerships currently offered at the school. P.S. 16 will continue to offer programming based on student interests, available resources, and staff support for those programs. The proposed co-location will not impact those opportunities. Students will continue to have the opportunity to participate in a variety of extra-curricular programs, though the specific programs offered at a given school are always subject to change. That is true for any City student as all schools modify extra-curricular offerings annually based on student demand and available resources.

Comments 12(a and b) express opposition to the targeted enrollment reduction in terms of reduced staff and funding that will result from a lower enrollment.

Planned enrollment reductions typically are coupled with a new replacement school providing students with immediate access to high quality options in that district. Co-locating new schools is intended to re-interest students in these campuses and provide new high quality options, and to bring the existing school to a size where school-based improvement is more feasible. While it is true that the staff and funding at P.S. 16 will decrease, this is necessary to ensure that as many students as possible have access to the best possible education.

In New York City, we fund schools through a per pupil allocation. That is, funding “follows” the students and is weighted based on students’ grade level and need (incoming proficiency level and special education/ELL/Title I status). If a school’s population declines the school’s budget decreases proportionally—just as a school with an increase in students receives more money. Even if the DOE had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls. Further, as student enrollment at P.S. 16 declines, the school’s staffing needs may be reduced. All excessing will be conducted in accordance with existing labor contracts.

Comment 14 offers the suggestion that instead of the school being co-located, the school should have an administration for the early childhood grades and grades 3-5.

As previously mentioned, the DOE acknowledges that there are some members of the school’s community that are opposed to the proposal. However, the DOE believes that reducing the enrollment of P.S. 16 beginning in September 2014 and providing a new option for elementary school students in the R016 building will benefit current and future students at P.S. 16. The enrollment reduction is intended to provide an opportunity for students currently attending P.S. 16 to improve by narrowing the focus to a smaller number of students, and to allow for a new school option to develop in building R016.

Comment 15 is not directly related to the proposal and does not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.