

Public Comment Analysis

Date: October 29, 2013

Topic: The Proposed Opening and Co-location of Grades Six Through Eight of New Secondary School Eagle Academy For Young Men of Staten Island (31R028) with Existing School I.S. 49 Berta A. Dreyfus (31R049) in Building R049 Beginning in the 2014-2015 School Year

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 grades six through eight of a new district secondary school, Eagle Academy For Young Men of Staten Island (31R028, “Eagle Academy”) in building R049 (“R049”), located at 101 Warren Street, Staten Island, NY 10304 in Community School District 31 (“District 31”). 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. Eagle Academy will be co-located in R049 with I.S. 49 Berta A. Dreyfus (31R049, “I.S. 49”); an existing middle school serving students in grades six through eight. Building R049 also provides space to the School of One Program. Additionally, there are two community based organizations (“CBO”) located in R049: JCC Beacon and SI College.

Eagle Academy is a new district secondary school that will serve male students in grades six through twelve at full scale. However, this proposal only involves the co-location of Eagle Academy’s sixth through eighth grades. Eagle Academy will offer a rigorous academic program designed to equip students with the skills necessary to achieve post-secondary success.

I.S. 49 is a zoned middle school serving 834 students in sixth through eighth grades in R049 during the 2013-2014 school year. I.S. 49 currently admits students residing within the R049 zone. I.S. 49 also admits students into a second middle school program, the Scholars Program, which utilizes a test-based admissions method and is open to eligible students in District 31.

If this proposal is approved, beginning in the 2014-2015 school year, Eagle Academy will serve students in sixth grade in R049, where it will be co-located with I.S. 49. Eagle Academy will add one grade level every year until the school reaches its full grade span in R049 of sixth through eighth grade in the 2016-2017 school year.

The DOE anticipates that Eagle Academy will grow to serve ninth grade students in a location to be determined in the 2017-2018 school year, and that Eagle Academy will add one grade level every year at that location until it reaches full grade span at that location serving grades nine through twelve in the 2020-2021 school year. Thus, the DOE anticipates that Eagle Academy will be split-sited starting in the 2017-2018 school year. The DOE anticipates that Eagle Academy will reach full scale in the 2020-2021 school year, serving sixth through eighth grades in R049, and ninth through twelfth grades in a location to be determined. The DOE will, if necessary, propose the siting of Eagle Academy’s grades nine through twelve in a separate Educational Impact Statement (“EIS”) at a later date in accordance with Chancellor’s Regulation A-190.

Eagle Academy will admit middle school male students through an application process administered by The Office of Student Enrollment (“OSE”) using a limited unscreened admissions method. Male students who reside in District 31 will be eligible to apply. Those eligible students who attend an information session, an open house event, or visit the school's exhibit at any one of the Middle School Fairs will have priority. The DOE anticipates that Eagle Academy will also have a limited unscreened admissions method for ninth through twelfth grade, with a priority for continuing eighth grade students and then to male students residing in Staten Island.

In 2014-2015, Eagle Academy will enroll approximately 75-85 students in sixth grade in R049. In 2015-2016 Eagle Academy will serve approximately 150-170 students in sixth and seventh grades in R049. In 2016-2017 and beyond, Eagle Academy will serve approximately 225-255 students in sixth through eighth grades in R049.

According to the 2011-2012 Enrollment, Capacity, Utilization Report (the “Blue Book”), R049 has the capacity to serve an estimated 1,190 students. In 2013-2014, the building serves approximately 834 students, yielding an estimated building utilization rate of 70%. This means that the building is “under-utilized” and has space to accommodate additional students.

If this co-location proposal is approved, Eagle Academy will gradually phase into R049 until it serves students in grades six through eight. Eagle Academy will serve students in sixth grade in the 2014-2015 school year and will add one grade level every year until the school reaches its full grade span of sixth through eighth grade in R049 in the 2016-2017 school year, serving approximately 225-255 students in R049. In 2016-2017, once Eagle Academy’s middle school grades are at full scale in R049, it is projected that there will be 1,045 - 1,105 students served in R049, thereby yielding an estimated building utilization rate of 88% - 93%.

The DOE anticipates that at full scale Eagle Academy will serve 525-595 students in sixth through twelfth grades across both buildings where Eagle Academy will be sited. Eagle Academy will reach full scale in 2020-2021.

The proposed co-location of Eagle Academy in building R049 is part of the DOE’s central goal to create new school options that will better serve current and future students and the community at large and will provide another option in the R049 building.

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 I.S. 49.

Summary of Comments Received

A joint public hearing regarding the proposal was held at I.S. 49 on October 28, 2013. At the hearing, interested parties had the opportunity to provide input on the proposal. Approximately 153 members of the public attended the hearing and 31 people spoke. Present at the meeting were Senior Superintendent Elaine Gorman; District 31 Superintendent Jessica Jenkins; District 31 Community Education Council (“CEC 31”) representatives Sam Pirozzolo, Michael Reilly, Irene Maiello, and LaTonja McMillian; Citywide Council for High Schools (“CCCHS”) representative Martin Krongold; Linda Hill, Principal of

I.S. 49; I.S. 49 School Leadership Team (“SLT”) representatives Cheryl McMillian and Laura Cavalleri; Councilmember Debi Rose; Shannon Watkins, a representative of Senator Diane Savino; and Emily Ades from the Office of Portfolio Management.

The following comments and remarks were made at the joint public hearing on October 28, 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’s co-location 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 prevent I.S. 49 from using the new science lab or The School of One rooms.
2. Michael Reilly, representing CEC 31, stated that he is opposed to co-locations
 - a. He said that he is opposed to the idea of spending money to duplicate administrations.
 - b. He expressed support for Eagle Academy but suggested it be placed in an alternate location on Staten Island.
3. LaTonja McMillian, representing CEC 31, expressed opposition to the proposal and stated that resources need to be added to I.S. 49.
4. Laura Cavalleri representing the I.S. 49 SLT expressed opposition to the proposal and stated that a single sex school should not be co-located with a co-ed school.
5. Cheryl McMillian representing the I.S. 49 SLT stated that she is opposed to the co-location.
 - a. She expressed concern that Eagle Academy will not enhance I.S. 49 and that more resources are needed at I.S. 49.
6. Martin Krongold representing CCHS stated that he is opposed to the proposal.
 - a. He expressed concerns about the co-location in R049 because the DOE does not offer appropriate supports to co-located schools and that shared space plans have to be taken into consideration.
 - b. He expressed support for Eagle Academy and stated that the community will embrace this model but that the DOE should provide an alternate location where Eagle Academy can be accommodated.
 - c. He said that the DOE should pursue community partnerships to support the Eagle Academy and I.S. 49 families.
7. Councilmember Debi Rose expressed opposition to the proposal.
 - a. She stated that she is very much in support of Eagle Academy opening a school in Staten Island and believes that this will benefit the North Shore community.
 - b. She expressed that she supports Eagle Academy in an alternate location and does not support the opening at R049 due to space-sharing concerns and overcrowding.
 - c. She noted that there are other options in Staten Island such as Immaculate Conception or St. Mary’s and would like to see Eagle Academy sited in a location where it can grow.
 - d. She stated that she supported a resolution for a moratorium on school closures and co-locations.
8. Multiple commenters were opposed to the co-location because there are other options on Staten Island where the school could be located.
 - a. Multiple commenters mentioned St. Mary’s, St. Sylvester’s, and St. Peters School for Boys as alternate locations for Eagle Academy.
9. Multiple commenters expressed general opposition to the co-location.
 - a. Multiple commenters expressed concerns about safety in co-located buildings.

- b. Multiple commenters expressed concerns about sharing the gym, cafeteria, and auditorium and stated that the hallways are already over-crowded.
 - c. Multiple commenters stated that smaller class sizes should have priority over adding another school to the building.
 - d. Multiple commenters expressed that they do not want to share the School of One lab or the new Science lab with another school organization.
 - e. Multiple commenters were concerned that Eagle Academy only offers a choice option for boys and expressed that female students on Staten Island should also be offered choice.
 - f. Multiple commenters expressed support for the administration and staff at I.S. 49 and said that I.S. 49 has shown improvement.
 - g. One commenter mentioned that funding used to support Eagle Academy should be used for I.S. 49 instead to support additional arts programs, gym equipment, and new textbooks.
10. Multiple commenters expressed support for the proposal.
- a. They stated that Eagle Academy will benefit the community and that they have worked on getting this school to open in Staten Island for several years.
 - b. One commenter stated that 100% of Eagle Academy students go to college and that Staten Islanders should fight to have this type of school in the community.
 - c. One commenter related her experience at a co-located school where the primary school in the building benefitted from the additional resources that the new school brought to the community. Enrollment at the primary school increased and the school became more proactive and showed academic improvement.
 - d. One commenter stated that discipline is a high priority at Eagle Academy that and that safety will not be an issue.
 - e. One commenter said that the graduation rate on Staten Island is less than 50% and that Eagle Academy has had proven success and over 90% graduation rates.
 - f. Multiple commenters said that co-locations can be successful if administrations and staff work together and collaborate to create a healthy environment for all students.
11. Multiple commenters requested that the DOE listen to the concerns and opinions of parents.

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

12. A commenter stated that the translated materials were not provided to I.S. 49.

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

13. A commenter stated that P.S. 16 should not be co-located and that the dual- language program should be expanded to serve middle school grades.

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

Comments 1(a) and 9(d) express opposition to the proposed co-location in terms of the specific decisions around placement of Eagle Academy within the R049 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. If this proposal is approved, there will be sufficient space to accommodate I.S. 49 and Eagle Academy pursuant to the Citywide Instructional Footprint (the "Footprint") throughout the period in which Eagle Academy 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/ronlyres/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 a representative of the Office 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.

School of One is not expected to lose any space or reduce the services offered as a result of this proposal.

Comments 2(a), 3, and 9(f, g) express opposition to the proposal, suggesting that it does not make sense to use funding for a new school when I.S. 49 could use the additional funds to support the existing school.

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.

Both I.S. 49 and Eagle Academy will receive Fair Student Funding in the same manner as all other New York City schools. Funding follows the students and is based on pupil academic needs (i.e., special education, ELL, poverty, and/or proficiency status).

Comments 2(b), 6(b), 7(a,b,c), and 8(a) express support for Eagle Academy but stated that an alternate location where it will not be co-located would be more appropriate for the school.

Roughly half of our schools share space in a building. Co-locations allow us to use our limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because we have scarce resources and a demand for more options. In reference to locating Eagle Academy in an alternate location, the DOE took several factors into consideration in order to determine if R049 was an appropriate location for grades 6-8 of Eagle Academy. For example, according to the 2011-2012 Enrollment Capacity Utilization Report ("Blue Book"), building R049 has a target capacity of 2,318 students. In 2012-2013, the building serves approximately 1,190 students, yielding a building utilization rate of 70% which means that the building is under-utilized and has space to

accommodate additional students. In 2016-2017, once Eagle Academy's middle school grades are phased in to building R049, it is projected that there will be approximately 1,045–1,105 students served in R049, yielding an estimated building utilization rate of approximately 88%-93%. The DOE anticipates that building R049 will still have excess space once Eagle Academy has completed its phase in.

A number of sites that are not owned by the DOE were suggested. The DOE has sited majority of the new capacity seats funded under the current FY 2010 – 2014 Five Year Capital Plan.-The new FY2015-2019 Five Year Capital Plan will be released in early November. If a seat need were to be identified for Staten Island, the School Construction Authority ("SCA") in conjunction with the DOE will be happy to evaluate potential sites.

Comment 4 expressed opposition to co-locating a single sex school in a co-ed building. Comment 9(e) expressed concerns about Eagle Academy only being offered to male students and questioned why there is not a similar model for an all-girls school.

Across the City, there are many schools serving different grade levels and different populations; 14 of these are single-sex schools that are co-located with co-ed schools. Potential problems are mitigated by the planning and leadership of the principals involved.

While it is true that Eagle Academy is an all-boys school there are several high quality options available for both male and female middle school students in Staten Island such as The Marsh Avenue Expeditionary Learning School, The Michael J. Petrides School, and the four Middle School Scholars Programs available to eligible students. Finally, there are nine Citywide middle schools open to all students and residents of New York City.

Comments 5 and 9(f) expressed opposition to the proposal and conveyed support for the staff and administration of I.S. 49 and noted that more resources should be added to I.S. 49. Comment 6(c) specifically noted that community partnerships should be pursued to further support schools.

The DOE commends and acknowledges the administration, the staff, and students at I.S. 49 for their hard work. However, the DOE believes that the students in this community would be well-served by an additional school option and as previously noted, roughly half of our schools share space in a building, allowing us to use our limited facilities more efficiently. That said, I.S. 49 will continue to receive the support and resources needed to further succeed. All schools receive support and assistance from their superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. The DOE does everything it can to provide schools with leadership, operational, instructional, and student supports that it needs to succeed.

I.S. 49 already has many partnerships with community based organizations that enhance the academics and enrich the school culture. Some of these partnerships include The Snug Harbor Cultural Center & Botanical Garden, Adventure Bound; Pocono Environmental Education Center (PEEC); Stewards of Tomorrow; City Harvest; Green Apple Corp; Jewish Community Center (JCC); Beacon; Play Rugby USA Cooperative; Healthy, Active, Motivated, Positive Students (CHAMPS); College of Staten Island; Wagner College; Staten Island University Hospital and St. John's College, The DOE anticipates that Eagle Academy will also have several partnerships with community organizations that will benefit their students. In other locations, Eagle Academy has partnerships with The Noel Pointer Foundation, One

Hundred Black Men, Eagle Foundation, Nu Visions Performing Arts Programs and Elite Prototype Athletics. The DOE supports any efforts by I.S. 49 to secure additional partnerships.

Comments 6(a), 7(d) and 9(b) express opposition to the co-location proposal, suggesting that proper support is not given to co-located schools, the school building will be overcrowded, and usage of the shared spaces will be limited.

As in other situations where schools are co-located, the schools will need to share large common and specialty rooms in the building, such as the cafeteria, the gymnasium, the auditorium, and the library. Specific decisions regarding the allocation of the shared spaces 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.

Principals from each school organization co-located in a building serve on a Building Council to make decisions about overall use of the shared space and shared space schedules including the use of the cafeteria and scheduling of lunch periods for students in each co-located school organization. If the principals are unable to agree upon a schedule for shared spaces, there is a mediation process outlined in the Campus Policy Memo, which is available at: <http://schools.nyc.gov/community/campusgov>.

If this proposal is approved, the Office of Space Planning will work with the Building Council to ensure an equitable allocation of the excess space. In determining an equitable allocation, the Office of Space Planning 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. In addition, the Office of Space Planning will work with the schools in building R049 to ensure a smooth transition, if necessary, of any rooms currently being used above schools' footprint allocations. During the course of Eagle's phase-in, the number of excess rooms will decrease as Eagle's baseline footprint allocation increases to reflect its larger population.

Comment 9(a) suggests 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.

Comment 9(c) asserts that the under-utilized space in R049 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 some members of the schools' communities that are opposed to the proposal, and/or prioritize smaller class sizes. However, given the low utilization in R049 and the available classroom space, we believe that co-locating a new school will best serve the families in this community.

Comments 10 (a-f) express support for the proposal and do not require a response.

Comment 11 requests that the DOE seek parent feedback for this proposal.

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 I.S. 49 on the DOE's Web site, and in 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. 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.

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 R049 will be able to create productive and collaborative partnerships.

Comment 12 stated that translated materials were not provided to the school.

According to the language needs submitted by I.S. 49 approximately 15% of students speak Spanish while the remainder speaks English or another language with a need less than 4% of the student population. Consistent with the 10% needs threshold outlined in Chancellor's Regulation A-663, the DOE provides written translated materials for language needs impacting 10% or more of the student population. That said, Principal Hill did make a specific request for additional translated materials to be provided in Arabic (less than 2% of the population) and Chinese (less than 4% of the population) for the school community. All translated materials were provided to the school by October 16, 2013 in advance of the Joint Public Hearing on October 28, 2013.

Comment 13 is not related to this proposal and does not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.

