

Public Comment Analysis

Date: October 29, 2013

Topic: The Proposed Co-location of New District Middle School 28Q332 with Existing Schools J.H.S. 72 Catherine & Count Basie Middle School 72 (28Q072) and P.S. Q993 (75Q993@Q072), a District 75 School, in Building Q072 Beginning in the 2014-2015 School Year

Date of Panel Vote: October 30, 2013

Summary of Proposal

On September 12, 2013, The New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to co-locate a new district middle school, 28Q332, that will serve students in grades six through eight, in building Q072 (“Q072”), located at 133-25 Guy R Brewer Boulevard, Queens, NY 11434 in Community School District 28 (“District 28”), beginning in the 2014-2015 school year. 28Q332 will be co-located in Q072 with J.H.S. 72 Catherine & Count Basie Middle School 72 (28Q072, “J.H.S. 72”), an existing middle school serving students in grades six through eight, and P.S. 993@Q072 (75Q993@Q072, “P993@Q072”), one site of an existing multi-site District 75 (“D75”) school serving students in grades six through eight. In addition, Kidwise and the Beacon program, two community based organizations (“CBOs”), are located in Q072.

J.H.S. 72 is open to students and residents of District 28 with priority admissions for students in the Q072 zone. J.H.S. 72 is projected to serve approximately 985 students in sixth through eighth grades in Q072 during the 2013-2014 school year. P993@Q072 is an existing D75 program that serves students with an Individualized Education Program (“IEP”) classification of multiple disabilities and autism. P993@Q072 is projected to serve approximately 36 students in grades six through eight during the 2013–2014 school year.

28Q332 is a new middle school that, if this proposal is approved, will open in September 2014 in Q072, where it will be co-located with J.H.S. 72 and P993@Q072. 28Q332 will grow to serve students in sixth through eighth grade and will admit students through a limited unscreened admissions method with a priority to the Q072 zone that admits students through the District 28 Middle School Choice process. Students will be matched to a school in District 28 based on student preference and the school selection criteria through a matching process managed by the Office of Student Enrollment (“OSE”). 28Q332 will be open to students and residents of District 28 with priority admissions for students in the Q072 zone. Limited unscreened schools give admissions priority to students who demonstrate interest in the school by attending an information session, attending an open house event, or visiting the school's exhibit at any one of the Middle School Fairs. In 2014-2015, 28Q332 will enroll approximately 115-125 students in sixth grade. In 2015-2016, 28Q332 will serve approximately 230-250 students in sixth and seventh grades. In 2016-2017, 28Q332 will complete its phase-in reaching “full scale,” and serving approximately 345-375 students in grades six through eight.

According to the 2011 – 2012 Enrollment, Capacity, Utilization Report (the “Blue Book”), Q072 has the capacity to serve 1,615 students. In the 2013-2014 school year, the building serves approximately 1,021 students, yielding an estimated utilization rate of 63%. 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 J.H.S. 72, P993@Q072, and 28Q332. Once 28Q332 reaches full scale in 2016-2017, the Q072 building will serve approximately 1,320–1,392 students, yielding a building utilization rate of 82%-86%.

The proposed co-location of new school 28Q332 will provide District 28 with an additional middle school option.

The details of this proposal have been released in the 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 J.H.S. 72 and P993@Q072.

Summary of Comments Received

A joint public hearing regarding the proposal was held at Q072 on October 22, 2013. At this hearing, interested parties had an opportunity to provide input on the proposal. Approximately 350 members of the public attended the hearing, and 31 people signed up to speak. Present at the meeting were District 28 Superintendent Beverly Ffolkes-Bryant; District 28 Community Education Council (“CEC 28”) representatives President Deborah Dillingham and member Dr. Vera Daniels; J.H.S. 72 School Leadership Team (“SLT”) representative Principal Omotayo Cineus; Shruti Garg, representative from the office of Council Member Ruben Wills; Jamal Wilkerson, representative from the office of Councilman Leroy Comrie; Community Board 12 Chairperson Adrienne Adams; Pier Duncan from the Panel for Educational Policy (“PEP”); and Savita Iyengar and Dean Guzman from the Division of Portfolio Planning.

The following comments and remarks were made at the joint public hearing on October 22, 2013 on the proposal:

- 1) CEC 28 member Dr. Vera Daniels expressed opposition to all District 28 proposals and made the following statements:
 - a) She believes there was no public involvement in this decision.
 - b) She believes there was no request from the school community for additional middle school seats at Q072.
 - c) She believes the majority of students in J.H.S. 72 would not be able to attend the new school.
 - d) She believes equal opportunity for all middle school students in the zone would be compromised.
 - e) She believes the new school has no clear educational direction.
 - f) She believes sharing shared spaces is challenging.
 - g) She believes future enrollment of J.H.S. 72 may be impacted given the shared zone.
 - h) She believes utilization of rooms for extracurricular activities and partnerships will be affected by the co-location.
 - i) She believes small NYC public schools have not proven to perform significantly better than larger schools.
 - j) She requests that the DOE postpone any further actions on Q072 until the official Progress Report is available.
- 2) Jamal Wilkerson, representative from the office of Councilmember Leroy Comrie, made the following statements:
 - a) His office opposes all co-location proposals.
 - b) He believes co-locations create safety issues between the co-located schools.
 - c) He believes co-locations cause confusion within the community.

- d) He believes mixed-age co-locations do not make sense.
- 3) Community Board 12 Chairperson Adrienne Adams made the following comments:
 - a) She stated that the DOE uses “under-utilized” incorrectly.
 - b) She stated that the term “high quality” is highly offensive to existing schools.
 - c) She expressed opposition to sharing common spaces within a building, many of which are designed for a specific grade.
 - d) She expressed opposition to the Success Charter Network.
 - e) She believes the proposal is irresponsible and will potentially create a detrimental learning environment for all students involved.
- 4) CEC 28 president Deborah Dillingham made the following statements:
 - a) She stated that co-location is the top concern of every CEC in the city.
 - b) She believes parents should be more involved in the decision making process of a school.
- 5) Shruti Garg, representative from the office Council Member Ruben Wills, made the following comments:
 - a) She believes co-location proposals are detrimental to civil rights and liberties.
 - b) She believes co-locations take away classroom and program space for existing schools in the building.
 - c) She is against the co-location proposal at building Q072.
- 6) Multiple commenters expressed opposition to the proposal.
- 7) Multiple commenters expressed concern for how the three schools will share common spaces such as the auditorium, cafeteria, library, and bathrooms.
- 8) Multiple commenters expressed concern over the safety of the building as a result of this co-location.
- 9) Multiple commenters asked the DOE to give J.H.S. 72 more financial resources.
- 10) Multiple commenters stated that the building is overcrowded and needs smaller class sizes.
- 11) Multiple commenters expressed J.H.S. 72 welcomed families and children of Hurricane Sandy refugees that caused issues in the building.
- 12) Multiple commenters believed J.H.S. 72 will be phased out as a result of this proposal.
- 13) Two commenters stated co-locations stop existing schools’ enrollment from growing.
- 14) Two commenters expressed their support for the current programs offered at J.H.S. 72.
- 15) One commenter believed the new middle school will take seats away from J.H.S. 72.
- 16) One commenter believed the enrollment projections in the EIS are incorrect.
- 17) One commenter expressed concern over the safety of students taking public transportation.
- 18) One commenter asked the DOE to reopen recently closed schools.
- 19) One commenter questioned the political motivation of this proposal.
- 20) One commenter stated the Common Core curriculum pushes students out of the classroom.
- 21) One commenter stated the community needs more choices, but co-location is not a choice that is needed.
- 22) One commenter stated that parents were not consulted in regards to this proposal.
- 23) One commenter expressed the proposal will automatically be passed by the PEP.
- 24) One commenter expressed opposition to the proposal because they do not want to lose access to special programming in the building.
- 25) One commenter stated the building is not designed for co-location.
- 26) One commenter stated the building capacity stated by the DOE is not accurate.
- 27) One commenter stated Q072 has enough students in it.
- 28) One commenter stated J.H.S. 72 should expand their enrollment to all zoned students.
- 29) One commenter questioned what type of programs the new middle school will offer.
- 30) One commenter expressed support for the principal and school leadership of J.H.S. 72.

- 31) One commenter stated the DOE should add more programs to the building.
- 32) One commenter stated that the co-location at Martin Van Buren high school is harmful to students.
- 33) One commenter stated co-location decreases funding at the existing schools.
- 34) One commenter stated teachers will be fired as a result of the co-location.
- 35) One commenter asked what the projected amount of new students the new school will enroll.
- 36) One commenter questioned how the schools will get all the students on buses.

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

There were no written comments or voicemail comments submitted to the DOE regarding this proposal.

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

Comments 3(b), 3(d), 18, 20, and 32 are unrelated to the proposal and thus do not require a response.

Comment 2(d) relates to mixed-age co-locations.

The DOE is proposing to co-locate a new district middle school that will serve students in grades six through eight with an existing middle school serving students in grades six through eight, and one site of an existing multi-site school serving students in grades six through eight.

Comment 1(j) suggests the DOE postpones any further actions on Q072 until the official Progress Report is available

These proposals, and a set that will come 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.

Comment 30 supports the school leadership of J.H.S. 72. Comments 14 and 24 support J.H.S. 72 and the programs offered, and express concern that students will lose access to special programming in the building.

The DOE acknowledges these comments and recognizes the collaborative role that principals partake in developing schools. In addition, schools throughout the city are not just educational institutions, but rich

and tight-knit communities. The DOE expects that all schools will be fully engaged with the community and will continue to play a vital role as an anchor for the community.

The DOE supports and will continue to support all schools in the Q072 building during and after the implementation of this proposal if the proposal is approved. 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.

Comment 26 concerns the accuracy of the building capacity.

As described in more detail in the Blue Book, which is available at http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Enrollment/2011-2012_Classic.pdf, a building's target utilization rate is calculated by dividing the aggregated enrollment of all school organizations in the building by the aggregated "target capacities" of those organizations. Each school organization's "target capacity" is calculated based upon the scheduled use of individual rooms as reported by principals during an annual facilities survey, the DOE's standards for maximum classroom capacities (which are lower than the United Federation of Teachers ("UFT") contractual class sizes and differ depending on grade level), and the efficiency with which classrooms are programmed (i.e., the frequency with which classes are scheduled in a given classroom).

The most recent year for which target capacity has been calculated for buildings is 2011-2012. As described earlier in this EIS, the DOE's utilization rates for the 2013-2014 school year and beyond are based on the 2011-2012 target capacity, which assumes that the components underlying that target capacity (scheduled use of classrooms, maximum classroom capacity, etc.) remain constant. Thus, projected utilization rates for 2013-2014 and beyond provide only an approximation of a building's usage because each of the factors underlying target capacity may be adjusted by principals from year to year to better accommodate students' needs. For example, changing the use of a room from an administrative room to a homeroom at the high school level will increase a building's overall target capacity because for high schools administrative rooms are not assigned a capacity. Holding enrollment constant, this change would result in a lower utilization rate. Similarly, if a room previously used as a kindergarten classroom is subsequently used as a fifth grade classroom, the building's target capacity would increase because we expect that a fifth grade class will have more students than a kindergarten class. This is reflected in the fact that the DOE's goal for maximum classroom capacity is higher for fifth grade classrooms than for kindergarten classrooms. In this example, as well, assuming enrollment is constant, the utilization rate would decrease.

The building capacity assigned to Q072 in the 2011-2012 Blue Book is based on middle school use of the space. If this proposal is approved, J.H.S. 72, P993@Q072 and 28Q332 will receive their baseline allocation pursuant to the Citywide Instructional Footprint.

Comments 3(a), 5(b), 10, and 25 concern the allocation of space in building Q072 during a co-location, and whether Q072 is under-utilized. Comment 27 expresses that building Q072 does not need additional students.

As stated in the EIS, Q072 has the capacity to serve 1,615 students. In the 2013-2014 school year, the building is serving approximately 1,021 students, yielding a utilization rate of 63%. This means that the building is "underutilized" and has space to accommodate additional students. If this proposal is approved, there will be approximately 1,320-1,392 total students served in Q072 in 2016-2027. In 2016-

2017, when 28Q332 will complete its expansion and reach full scale, the projected utilization for Q072 as a result of the co-location will be approximately 82%-86%. Therefore, the building has adequate capacity to accommodate the co-location of J.H.S. 72, P993@Q072, and 28Q332. Projected enrollment figures and anticipated utilization rates for Q072 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 J.H.S. 72, P993@Q072, and 28Q332 pursuant to the Citywide Instructional Footprint (the "Footprint"), throughout the period in which 28Q332 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 most recent underutilized Space Memorandum and List was updated on November 20, 2012, and can be accessed at: http://schools.nyc.gov/NR/rdonlyres/6D8EA76A-82FA-4740-9ED1-66BCABEE8BFB/134525/UnderutilizedSpaceMemorandum112012_vFINALforprint.pdf.

The most recent underutilized Space Memorandum Addendum was updated on August 28, 2013, and can be accessed at: http://schools.nyc.gov/NR/rdonlyres/6D8EA76A-82FA-4740-9ED1-66BCABEE8BFB/149149/UUMemorandumAddendum_August2013vFINAL.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.

In 2014-2015, after J.H.S. 72, P993@Q072, and 28Q332 have received the baseline allocation of full-size classrooms according to the Footprint, approximately 16 excess full-size rooms will remain in the Q072 building. In 2015-2016, after each school has received the baseline allocations of full-size rooms according to Footprint, approximately 12 full-size rooms will remain in the Q072 building. In 2016-2017, after 28Q332 has phased in, and after each school has received the baseline allocations of full-size rooms according to Footprint, approximately 10 full-size rooms will remain in the building. The Building Council will determine the equitable distribution of excess rooms among existing schools in the building.

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 Q072 to ensure a smooth transition, if necessary, of any rooms currently being used above schools' footprint allocations. During the course of 28Q332's phase-in, the number of excess rooms will decrease as 28Q332's baseline footprint allocation increases to reflect its larger population.

Under this proposal, the available space in the Q072 building will be more efficiently used than in the 2013-2014 school year, and will provide 115-125 new sixth grade seats in 2014-2015; 230-250 new sixth and seventh grade seats in 2015-2016; and 345-375 new sixth, seventh, and eighth grade seats in 2016-2017 in Q072.

Comments 2(a), 2(c), 3(e), 4(a), 5(a), 5(c), 6, and 21 express general opposition to co-locations, and general opposition to the proposal. Comment 19 questioned the motivation behind this proposal.

Co-location is the everyday experience of more than half the schools in New York City. Of all district schools, approximately two-thirds are co-located with another school, most with another district school. Less than one quarter of our buildings have a charter school in them.

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.

If this proposal is approved, 28Q332 will provide students in the District 28 community with an additional middle school option, and the available space in the Q072 building will be more efficiently used than in the 2013-2014 school year.

As stated above, this proposal is not expected to impact the enrollment or programming at J.H.S. 72 or P993@Q072. The DOE expects that all schools and their respective students and parents will be respectful, engaged and will continue to play a vital role as an anchor for the community.

Comment 2(b) and 8 relate to safety in Q072 if this proposal is approved. Comments 17 and 36 specifically question the safety around transportation.

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.

The Office of Safety and Youth Development ("OSYD") will regularly monitor the campus schools' DOE incident data and the NYPD building crime data for spiking trends. When there is evidence of spikes in incidents and crime, OSYD will schedule a review of the data with representatives from all the co-located schools and follow up with a safety walk or a full comprehensive safety assessment to identify areas of concern and re-establish safety and security systems for the campus, as appropriate. The DOE makes available the following supports to schools relating to 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.

As stated in the EIS, transportation will be provided according to Chancellor's Regulation A-801: <http://schools.nyc.gov/NR/ronlyres/21A1B11A-886B-4F74-9546-E875EE82A14C/40303/A801.pdf>

This proposal is not expected to impact the transportation schedules of the other schools located in the Q072 building.

Comments 1(a), 1(b), 4(b), and 22 concern engagement with the District 28 community about this proposal.

The DOE is committed to engaging with the community for all proposals to implement a significant change in school utilization, as detailed in Chancellor's Regulation A-190. Chancellor's Regulation A-190 sets out the public review and comment process that the DOE undertakes with respect to all such proposals by the Chancellor, including co-locations. The DOE appreciates all feedback from the community regarding a proposal.

Engagement with the District 28 community began in June 2013. Representatives from the DOE communicated with the District 28 Superintendent, J.H.S. 72 and P.S. Q993 principals, network leaders, and cluster points. The DOE attempted to present at the August CEC meeting however, the CEC declined that offer and requested we attend the September meeting instead. On September 19, 2013, representatives from the Office of Portfolio Management attended a CEC meeting to present and discuss the proposal for a new middle school in Q072 with the CEC and community that were in attendance. When the EIS for this proposal was issued on September 13, 2013, they were made available to the staff, faculty and parents at J.H.S. 72, P993@Q072, and CEC 28, on the DOE's Web site and in J.H.S. 72's and P993@Q072's main offices. In addition, the DOE dedicated a proposal-specific website, voicemail and email address to collect feedback on this proposal. Furthermore, all schools' staff, faculty, and parent communities were invited to the Joint Public Hearing to provide further feedback.

Although the DOE recognizes that some members in the community oppose this proposal, the DOE believes that, if this proposal is approved, the school communities in Q072 will be able to create productive and collaborative partnerships.

Comment 23 suggests a decision has already been made regarding this proposal.

While the DOE supports the proposed opening and co-location of 28Q332 in Q072, the DOE notes that no decision has been made on this proposal and that it will continue to collect public feedback on this proposal before the PEP votes. Any proposed change to school utilization must go through the process outlined by Chancellor's Regulation A-190 and be approved by the PEP before it can take effect.

Comment 12 suggests that this proposal will lead to the phase-out of J.H.S. 72.

As stated in the EIS, this proposal is for the co-location of 28Q332 in Q072. The DOE does not believe that the proposed co-location of 28Q332 will impact J.H.S. 72's enrollment or the grades served by the school.

Comments 9 and 33 pertain to funding at J.H.S. 72.

The DOE funds 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 from 2,500 to 2,000 students, the school’s budget decreases proportionally—just as a school with an increase in students receives more money. Even if the Department of Education had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls. As stated in the EIS, the DOE does not anticipate that the proposed co-location of 28Q332 will impact enrollment at J.H.S. 72.

Fair Student Funding (“FSF”) dollars – approximately \$5.0 billion in the 2012-2013 school year based on projected registers – are used by all district schools to cover basic instructional needs and are allocated to each school based on the number and need-level of students enrolled at that school. All money allocated through FSF can be used at the principals’ discretion, such as hiring staff, purchasing supplies and materials, or implementing instructional programs. As the total number of students enrolled changes, the overall budget will increase or decrease accordingly, allowing the school to meet the instructional needs of its student population. In addition to the FSF student-need based dollars a school receives, all schools receive a fixed lump sum of \$225,000 in FSF foundation and \$50,000 in Children First Network Support to cover administrative costs. Principals have discretion over their budget and make choices about how to prioritize their resources.

Comments 1(c), 1(d), 1(g), 13, 15, 16, 28 and 35 pertain to the admissions method and future enrollment of J.H.S. 72, and the impact of the shared zone with 28Q072.

As stated in the EIS, this proposal is not expected to impact current or future enrollment or instructional programming at any of the programs currently offered by J.H.S. 72. Nothing leads us to believe that the proposed co-location will impact J.H.S. 72’s enrollment. The enrollment projections in the EIS are based on current enrollment at J.H.S. 72 at the entry point grade level, and assume that the same number of students will age up and that there will be stable incoming enrollment at the entry point grade.

As stated in the EIS, J.H.S. 72 currently admits students through the District 28 Middle School Choice Process using an unscreened admissions method, with a priority to the Q072 zone. Students zoned to J.H.S. 72 may also apply to District 28 choice middle schools through the District 28 Middle School Choice Process. A student’s zoned school is determined by his or her home address. J.H.S. 72 currently has a 42% middle school zone retention rate. The DOE believes that the Q072 zone and District 28 community will benefit from having an additional middle school option in the Q072 building.

If this proposal is approved, beginning in 2014-2015, incoming sixth grades students who reside in District 28 will have a new option for middle school, 28Q332, which will open in September 2014 in the building Q072. If this proposal is approved, 28Q332 will be a limited unscreened middle school with a priority to the Q072 zone that admits students through the District 28 Middle School Choice Process. Limited unscreened schools give admissions priority to students who demonstrate interest in the school by attending an information session, attending an open house event, or visiting the school’s exhibit at any one of the Middle School Fairs. 28Q332 will serve approximately 115-125 students in sixth grade during the 2014-2015 school year, approximately 230-250 students in sixth and seventh grades during the 2015-2016 school year, and approximately 345-375 students in grades six through eight during the 2016-2017 school year. Enrollment projections are based on a phase-in plan of four general education or Integrated Co-Teaching sections and one Self-Contained section in the first year. Actual enrollment for 2014-2015, however, depends on applicant demand.

28Q332 and J.H.S. 72 will share a zone. Future students in that shared residential zone will have admissions priority to both of the schools in the zone, in accordance with Chancellor's Regulation A-101. The full details of A-101 can be found at: <http://schools.nyc.gov/RulesPolicies/ChancellorsRegulations/default.htm>.

Through the middle school application process, students will be offered the opportunity to apply to a range of middle schools within their district, and/or schools with borough-wide or Citywide eligibility. Students may also choose to apply to a number of schools that manage their own admission process. Information about all of these options is printed in each district's Middle School Directory which can be found at <http://schools.nyc.gov/ChoicesEnrollment/Middle/Publications/default.htm>. Please note that this directory is updated yearly. General information about the middle school application process can be found on the DOE's Web site at: <http://schools.nyc.gov/ChoicesEnrollment/Middle/default.htm>.

The Citywide deadline for fifth graders to submit middle school applications for the 2014-2015 school year is in December. Additionally, new middle schools designated to open throughout the City for the 2014-2015 school year will be available for students to consider. 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/Middle/Calendar/default.htm>.

Comment 1(f), 3(c), and 7 concern the shared spaces in the building, with particular concern for the auditorium, cafeteria, library, and bathrooms. Comment 11 notes that J.H.S. 72 welcomed families and children of Hurricane Sandy refugees, which caused shared space issues in the building.

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 Q072 to ensure a smooth transition, if necessary, of any rooms currently being used above schools' footprint allocations. During the course of 28Q332's phase-in, the number of excess rooms will decrease as 28Q332's baseline footprint allocation increases to reflect its larger population.

Comment 1(h) concerns the utilization of rooms for extracurricular activities and partnerships.

The DOE does not anticipate that this proposal will impact the current special programs and initiatives, extra-curricular activities, sports, and partnerships at J.H.S. 72. J.H.S. 72 will continue to offer special programs and initiatives, and extra-curricular programs based on student interests, available resources, and staff support for those programs. However, the co-location may change the way those programs are configured. For example, some activities may need to share classroom space or the scheduling of these activities may change as a result of greater demands on the available space during or after school hours. 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.

P993@Q072 does not currently offer extra-curricular activities or partnerships.

Comment 1(i) states that small schools have not proven to perform significantly better than larger NYC public schools.

The central goal of the Children First reforms is simple: to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school – led by a dedicated leader with a vision for student success.

To ensure that as many students as possible have access to the best possible education, under this Administration, New York City has replaced 140 of our lowest-performing schools with better options and opened 654 new schools: 478 districts schools, 3 District 75 schools, and 173 public charter schools. As a result, we've created more high-quality choices for families.

Further, a recently published report by MDRC found that our new, small schools, “which serve mostly disadvantaged students of color, continue to produce sustained positive effects, raising graduation rates by 9.5 percentage points. This increase translates to nearly 10 more graduates for every 100 entering ninth-grade student.”

There is more work to do, but the recently released MDRC report shows our policies are effective and serving those who matter most: our students.

Comment 1(e), 29, and 31 relates to the type of programs the proposed middle school will offer.

If this proposal is approved, the Office of New Schools (“ONS”) will begin the process of selecting and training effective leaders to open 28Q332. The DOE believes in giving principals autonomy to program their schools as they see fit. In addition to vetting and preparing the new school principal candidates, ONS provides post-opening support in concert with Networks and district superintendents.

Additional information about the new district schools process is available at:
<http://schools.nyc.gov/community/newschools/default.htm>

Comment 34 suggests that teachers will be fired as a result of the co-location.

The proposed co-location is not expected to change the number of personnel positions assigned to J.H.S. 72 and P993@Q072, nor is it expected to significantly alter the duties of current staff at J.H.S. 72 and P993@Q072.

New administrative staff and non-pedagogical positions will be created at 28Q332 over the course of the school's phase-in. 28Q332 is expected to hire additional teachers as each new grade is added. The precise number of positions needed for the 2014-2015 school year will be determined once annual enrollment projections are released in the Spring of 2014. Similarly, the number of new positions created to serve students in the new grades will be determined based on annual enrollment projections that become available as the school grows to serve those grades. New district schools follow the hiring process consistent with the procedures set forth in the collective bargaining agreement between the DOE and UFT.

Changes Made to the Proposal

No changes have been made to the proposal.