

Public Comment Analysis

Date: October 29, 2013

Topic: The Proposed Opening and Co-location of a New District High School (21K768) with John Dewey High School (21K540) and P721K (75K721) in Building K540 Beginning in 2014-2015

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”) proposing to open and co-locate a new district high school (21K768, “21K768”), that will serve students in ninth through twelfth grades in building K540, located at 50 Avenue X, Brooklyn, NY 11223, within the geographical confines of Community School District 21 (“District 21”). 21K768 will open in 2014-2015 with ninth grade, adding one grade each year until it reaches its full grade span and serves grades nine through twelve in 2017-2018. 21K768 will admit students through the Citywide High School Admissions Process using a limited unscreened admissions method. If this proposal is approved, 21K768 will be co-located in K540 with John Dewey High School (21K540, “Dewey”), an existing high school that serves grades nine through twelve and one site of a multi-sited District 75 school (75K721, “P721K@K540”) that serves students in grades nine through twelve in an inclusion program at Dewey. 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. Two community-based organizations (“CBOs”), Spark and Council for Unity, are also located in K540.

In a District 75 inclusion program, students with disabilities receive special education services in a general education classroom along with general education students. Thus, students at P721K@K540 are enrolled in general education classes at Dewey based on their Individualized Education Program (“IEP”) recommendations and receive Special Education Teacher Support Services (“SETSS”) from a District 75 special education teacher. If this proposal is approved, students at P721K@K540 will continue to be enrolled in general education classes and will continue to receive all mandated services.

If this proposal is approved, 21K768 will open for the 2014-2015 school year. 21K768 will admit approximately 105-115 ninth-grade students in 2014-2015 and will add one grade level every year until the school reaches its full grade span of ninth through twelfth grades in the 2017-2018 school year when it will serve approximately 420-460 students.

The DOE has identified K540 as an under-utilized building. K540 has the capacity to serve approximately 2,434 students. In 2013-2014, Dewey is projected to serve approximately 1,630 students in ninth through twelfth grades and P721K@K540 is projected to serve approximately 22 students in ninth through twelfth grades. This yields a building utilization rate of approximately 68%, which demonstrates that the building is “under-utilized” and has space to accommodate additional students. If this proposal is approved, in

2017-2018, K540 will serve 2,050-2,135 students from 21K768, P721K@K540, and Dewey, collectively, which will yield a projected utilization rate of 84%-88%. Thus, K540 has sufficient space to accommodate the proposed co-location.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at K540 on October 23, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 490 members of the public attended the hearing, and approximately 80 people spoke. Present at the meeting were Senior Superintendent and Chancellor's Designee Elaine Gorman; Principal of Dewey, Kathleen Elvin; Principal of P721K@K540 Barbara Tremblay; President of the District 21 Community Education Council ("CEC 21") Heather Fiorica; and Citywide Council on High Schools representative Marianne Russo. The following elected officials were present at the meeting: New York City Councilmember Vincent Gentile; New York City Councilmember Dominic Recchia; New York State Senator Diane Savino; and New York State Assembly members William Colton and Steven Cymbrowitz. Additionally, Estelle Acquah and Carrie Marlin from the Division of Portfolio Planning were present.

The following comments and remarks were made at the Joint Public Hearing on October 23, 2013:

- 1) Principal Kathleen Elvin stated the following:
 - a) K540 is not the underutilized facility described in the EIS. The DOE has severely under projected the enrollment at Dewey. Last year Dewey had 350 more students than it was budgeted for. This year, it has a register of 1,957 despite being projected for 1,630 students, which is above the 68% utilization rate. The school is underfunded by 327 students. Is there another school in the city that is as underfunded as we are?
 - b) Dewey has been caught in a series of policy decisions that have made it hard for parents to choose Dewey. Dewey was once a Transformation and Restart school, then a Turnaround school and slated to be closed. Parents were told Dewey was closing and given documentation to choose another school. Dewey was not in the high school directory and guidance counselors would not let students apply to John Dewey.
 - c) This community is still recovering from the effects of Hurricane Sandy. Dewey reportedly sustained some of the worst damage citywide. Other issues included destroyed, unclean furniture and a need to reassign staff to other schools, and the electrical system was working only intermittently for seven and a half months. Students lost instructional time and the school invested three hundred thousand dollars to support its summer programming to allow students to catch up. The electrical system is still not completely repaired. How can the DOE spend money to co-locate a new school when these repairs are still not completed?
 - d) It is a testament to the school community that Dewey is a high functioning school. Dewey's Progress Report grades have increased and we have a 74% graduation rate. Our Quality Review rating is "Proficient."
 - e) The DOE says that the co-location is to provide choice to parents, but there are more than 100 schools for parents to choose from. Only ten of these schools are medium to large comprehensive schools. Parents say that they are fatigued by choice and yearn for a comprehensive local school like Dewey and like those that exist in other cities. Cities such as Scarsdale have not implemented co-locations.

- f) Parents have relayed that they love the idea of coming to a place where everything is available for their child. There are no closed doors or restricted hallways. There is no breakfast at 9:30am and slots on single sports are not divvied up between competing schools.
- 2) Dewey's PTA President stated:
- a) The community was hit by Hurricane Sandy and there are parents who still do not have a roof over their heads.
 - b) The school has had a rough road these past few years. The DOE tried to close us but we persevered.
 - c) Dewey should be permitted to grow.
- 3) CEC 21 President, Heather Fiorica, stated the following:
- a) CEC members are volunteers who give support to the community. The CEC is mandated by law to host this hearing tonight. Fellow council members are here to support and listen to you.
 - b) This is the third hearing in District 21 in less than 30 days. We will speak at the Panel for Educational Policy ("PEP") meeting and ask the PEP to vote no to all co-locations.
 - c) District 21 is being invaded by co-locations at I.S. 096, I.S. 281, and now Dewey.
 - d) At least this co-location is not with a charter school because charter schools and district schools are not equal.
 - e) CEC 21 opposes this co-location proposal and passed a resolution indicating such.
 - f) Dewey is not underutilized. The EIS is flawed. Current enrollment is approximately 1,920 as opposed to 1,630, thus K540 is actually 80% utilized.
 - g) Students were not given the choice to choose Dewey because it was excluded from the high school directory. Parents and students were under the impression that the school was closing, and then Hurricane Sandy hit.
 - h) The graduation rate has increased to 74% and Dewey received a B grade on its Progress Report.
 - i) There is no need to co-locate an additional high school which would require two different administrations and sets of staff in the building.
- 4) Multiple commenters expressed support for Dewey, including its comprehensive programming, the vast array of extracurricular activities it delivers, its supportive environment, its excellent teachers and administration, the support it provides for special education students, its diverse student community, including many student that are recent immigrants, its ability to adequately prepare students to go to top colleges, and its large and tight knit alumni base.
- 5) Multiple commenters expressed general opposition to the co-location.
- 6) Multiple commenters expressed support for Principal Elvin and claims she has provided great leadership that is moving Dewey in a positive direction.
- 7) Multiple commenters stated that Dewey was not included in the 2012-2013 High School Directory. This led to declining enrollment and performance as parents and students were under the impression that Dewey was closing.
- 8) Multiple commenters stated that the DOE should provide more resources and support to Dewey and allow the school to grow.

- 9) A commenter stated the following:
 - a) The DOE should support Dewey instead of using funds to create a new school.
 - b) The new high school has no name. The community does not know what type of high school it will be, nor does it have input into the decision.
 - c) Sara Kaufman stated under sworn testimony that the new high school would be a Career and Technical Education (“CTE”) school and that the new leader would be introduced to the community in the upcoming month. However, at the Community Board 13 meeting, a staff member from the Division of Portfolio Planning said that the new high school would not be a CTE school.
 - d) This proposal should be withdrawn because it is rushed.

- 10) Citywide Council on High Schools representative, Maureen Russo, stated the following:
 - a) The EIS states that it does not anticipate that the co-location will impact admissions or programs at Dewey, however the school will indeed be affected. The EIS also stated that the DOE will work with the school for maximum efficiency. This actually means that specialty classes will be removed and there will be larger class sizes.
 - b) The building will not be underutilized with approximately 1,900 students on register. The EIS did not include information on how Dewey actually utilizes space. Where will the 16 rooms taken away from Dewey come from? Additional rooms will also be used for the staffing of the new school. The DOE will be creating an over-utilized building.
 - c) The pre-medicine and visual arts programs are not included in the EIS.
 - d) The DOE says it offers parents choice. However, at the high school fairs, all the schools sound the same.
 - e) Dewey has made great strides over the last few years and we should continue to support it. Give Dewey a chance to have its enrollment rise.
 - f) Instead of co-locating a new high school into the building, the programs that will be offered at the new school should be incorporated into Dewey.
 - g) The DOE is in a hurry to get this proposal approved before this Mayor leaves office.

- 11) Assemblyman Steven Cymbrowitz stated the following:
 - a) I stand firmly with the community tonight in saying no to this co-location. The proposal is misguided, dysfunctional and designed to be the death knell of Dewey.
 - b) This school has become a dumping ground for over-the-counter (“OTC”) students, who typically have a prior history of behavioral issues. The DOE is causing Dewey to fail by packing the enrollment with troubled students.
 - c) Even with these challenges, Dewey is flourishing. Graduation rates have increased and the percentage of graduates that are college ready has increased.
 - d) Dewey should not have to give up space because the DOE does not believe that the school deserves to occupy a whole building.
 - e) The Bloomberg education legacy is not a healthy one. Its policy has been to divide and conquer existing schools and to destroy schools that are struggling instead of extending a helping hand.
 - f) Enrollment at K540 is near capacity, contrary to what the DOE believes.
 - g) The DOE just plows ahead no matter what. Given the way this proposal was rushed, it seems like Dewey’s fate was decided even before this hearing was scheduled.

- 12) Councilman Dominic Recchia stated the following:

- a) I am a proud Dewey alumnus. When I went to school here the graduation rate was 100%, with 98% of students going on to college. When I was elected I tried very hard to work with Dewey to provide hundreds of thousands of dollars of support.
- b) The DOE is to blame for this school's past performance and leadership issues. The DOE claims they were always working to bring in a new leader for Dewey, but this did not happen quickly enough. Then the DOE tried to close the school.
- c) Dewey now has a great leader in Principal Elvin. The DOE needs to continue to support Dewey and bring in more funding instead of giving money to a new school.
- d) Because of Hurricane Sandy the school is not operating at one hundred percent.
- e) This community does not know who the leader of the new school will be or what the focus of the new high school will be.
- f) The community must come to the PEP meeting and have its voice heard. The community should call the Mayor and the Chancellor to persuade the administration to change the proposal.
- g) In seventy-two days there will be another mayor who could save Dewey.

13) Senator Diane Savino stated:

- a) I join the other elected officials in opposing this co-location. The PEP should reject this co-location.
- b) This is the third joint public hearing I have been to this week. This mayoral administration represents twelve years of divisiveness with co-locations pitting parents and communities against each other.
- c) We have seventy-one days left until a new mayor, likely Bill DeBlasio, will come in. He is committed to eliminating these divisive policies.
- d) The PEP should listen to the principals, CECs, and the community. The DOE should give more resources to Dewey.
- e) We will be at the PEP hearing to tell this administration that enough is enough.

14) Assemblyman William Colton stated the following:

- a) The DOE needs to listen to the people who are actually in our schools. Decisions are made by people in offices who have no idea what they are doing and the impact of their decisions.
- b) I believe that Dewey is an excellent school that can be even more excellent.
- c) This plan is seriously flawed because it does not benefit the students of Dewey. The DOE does not realize the effect that this co-location would have on Dewey's plans, programs, and extracurricular activities.
- d) It appears that the attempt was made to deliberately reduce the enrollment at this school by leaving Dewey out of the High School Directory order to make the building underutilized to bring in a new school.
- e) This plan should be opposed.

15) A commenter stated:

- a) I am against the co-location.
- b) Dewey has survived throughout the years.
- c) We should all go to the PEP meeting to speak against this proposal.
- d) The community should not give up and should continue to fight against this proposal.

16) A CEC member stated the following:

- a) Public money needs to go back into public schools. Money and space should not be given to charter schools.
 - b) When the elected officials do not do what we need them to do, we need to vote them out.
- 17) A CEC member stated:
- a) This meeting is fruitless because the DOE does not listen to what we say.
 - b) The community does not know what the new high school will be like.
 - c) If the DOE thinks that parents need choice, then it should give existing schools additional resources and allow the parents and students to decide what the community needs. Why pay for a separate administration?
 - d) This proposal will cause Dewey to have bigger class sizes.
- 18) A CEC member stated the following:
- a) The DOE should make decisions that actually benefit children.
 - b) The DOE tried to reduce Dewey's enrollment to create space in the building. The building utilization percentage exists only on paper and not in reality.
 - c) Students have indicated that the classes are already overcrowded. This co-location will create more crowding and unsafe conditions.
 - d) Co-location is not the answer. The DOE should give additional resources to Dewey to make it stronger.
 - e) There are fewer than seventy days left in the administration and the DOE is rushing these co-locations through. When the new administration comes, we will fight for these to be overturned.
- 19) A commenter stated the following:
- a) The DOE was looking to close down Dewey but we said Dewey needs a chance to succeed.
 - b) They are once again looking to phase out Dewey by not giving the school the resources and opportunity for the school and community to succeed.
 - c) No one knows what type of program this high school will have. It seems like the DOE wants to have a co-location just for co-location's sake.
 - d) The community deserves to be part of the process.
 - e) The PEP will rubber stamp this proposal and that is wrong.
- 20) A commenter stated that the co-location will cause overcrowding and limit resources.
- 21) A commenter stated the following:
- a) K540 is already at 80% capacity and has enough students. There is no need to add another school.
 - b) Having more students will lead to more paperwork for the offices and more staff. This will cost more money that could be allocated to Dewey instead.
- 22) A commenter stated that this proposal will decrease the resources available to Dewey students.
- 23) A commenter stated the following:
- a) Why should Dewey suffer and have its programs taken away?
 - b) The class-sizes are going to be bigger.
- 24) A commenter stated that if another school is added, resources will be taken away from Dewey students.

- 25) A commenter stated that K540 is overcapacity and there is no more room.
- 26) A commenter stated that the DOE severely miscalculates enrollment at Dewey.
- 27) A commenter stated the following:
- a) If the new school gets bigger and Dewey gets smaller, then Dewey will be ruined.
 - b) A co-location is not a good thing because it will not help students and it will take away Dewey's activities.
- 28) A commenter stated that the co-location will have a negative impact on Dewey's clubs and sports.
- 29) A commenter stated that there is not enough space and resources in the building to accommodate a new school.
- 30) A commenter stated that the DOE should support Dewey and allow time for the school to grow its enrollment.
- 31) A commenter stated that the DOE should leave Dewey alone and provide the school with more resources.
- 32) A commenter stated when he applied to Dewey, he thought it was closing. The DOE is purposely creating issues at the school.
- 33) A commenter stated the following:
- a) The co-location will impact the space allocated to Dewey because the new school will take space away from Dewey. What if the new school takes away Dewey's robotics club?
 - b) If four hundred additional students are enrolled at K540, classrooms will become overcrowded and students will not be able to focus.
- 34) A commenter stated the following:
- a) The DOE tried to close Dewey school down but it survived.
 - b) The DOE will be take away Dewey's Advanced Placement classes and specialty classes and the things that make Dewey unique.
- 35) A commenter stated that the co-location will make the hallways overcrowded.
- 36) A commenter stated that the co-location will ruin all of Dewey's programs.
- 37) A commenter stated the following:
- a) The DOE did not ask the community if it wanted a co-location.
 - b) The entire process will create stress around using shared spaces and will be unequal if one school has more amenities than the other.

- 38) A commenter stated the following:
- Dewey's students will not have the resources to be successful if this proposal is approved. President Obama has called on us to educate our students in Science, Technology, Engineering, and Math (STEM). Dewey's robotics and pre-medicine programs support this objective.
 - If we alienate students that no one else wants to educate, where will we be? If do not educate them, our democracy will cease to exist. We have to put children first and not corporations.
 - Co-locating a charter school is not going to work.
- 39) A commenter showed a video in support of Dewey's campus, school environment, and diverse array of academic and extracurricular offerings.
- 40) A commenter stated the following:
- The current students are exceptional.
 - This is the United States of America and this is a democracy. When an institution turns its back on its people, this shows arrogance and tyranny. We should persuade the next administration to withdraw this proposal.
 - District 21's middle school students should enroll in Dewey so that it is at capacity.
- 41) A commenter stated the following:
- The DOE has gravely mismanaged Dewey for the last five years.
 - If the DOE is not going to help Dewey, it should leave it alone.
- 42) A commenter stated that the DOE should take into consideration that parents are pleased that it is a single school in a single building.
- 43) A commenter stated the following:
- The DOE should stop trying to push the Mayor's agenda.
 - K540 is above 81% capacity and Dewey growing. Dewey has 1,957 students on register, which is 327 students above the EIS' projection.
- 44) A commenter stated that Dewey deserves an expansion, not a co-location.
- 45) A commenter stated that the co-location will negatively affect the sense of unity of the sports teams at Dewey because there will be multiple teams from multiple schools.
- 46) The DOE has tried to change Dewey, close Dewey, and now co-locate Dewey. The DOE is setting Dewey up for failure when it should just leave it alone to succeed.
- 47) A commenter stated the following:
- We are here due to a political motivation to co-locate charter schools.
 - I spoke in opposition to the proposed phase-out of Dewey and do not understand why the DOE is proposing to change Dewey again.
 - It is inefficient use of resources to have two principals and two schools in one building. It is like a university with separate colleges. Only the large schools will survive.
 - This proposal should be withdrawn.
- 48) A commenter stated that the co-location will cause discipline problems.

- 49) A commenter stated the following:
- Dewey has made improvements over the years, but it needs more time to let Principal Elvin improve the school.
 - The DOE should not rush to fill an agenda.
 - There are currently 1,950 students attending Dewey while the building has the capacity to serve 2,500 students.
 - The DOE's attempt to replace Dewey with Shorefront High School was a failure.
- 50) A commenter stated that the new chancellor should work with the CEC and Assemblyman Steve Cymbowitz to promote District 21 schools.
- 51) A commenter stated the following:
- The DOE has misled us and lied to us.
 - There are other buildings that could be used instead of K540, such as Grady, which stands at 52% capacity.
 - Dewey was not in the High School Directory and guidance counselors encouraged students not to apply.
 - The PEP should not vote against the parents' wishes.
- 52) A commenter stated the following:
- The implementation of mayoral control has caused the deterioration of New York City schools.
 - Dewey has a B grade on its Progress Report and a Proficient on its Quality Review. Co-locating another school in K540 will destroy its progress.
- 53) A commenter stated that Dewey does not need another high school taking its resources.
- 54) A commenter stated the following:
- Hurricane Sandy caused a lot of damage and destroyed homes. The school was on a generator for over a year.
 - People thought Dewey closed because it was not in the High School Directory.
 - Please give Dewey more time to flourish and please do not hinder its progress.
- 55) A commenter stated the following:
- Dewey has a graduation rate that is on par with or better than many schools and its college and career index is among the highest in the city.
 - There was false information in the press about damage from Hurricane Sandy. The school was on a generator for almost a year.
 - K540 is at over 80% capacity.
 - Putting another school in K540 will take away resources from Dewey. The DOE should support Dewey.
- 56) A commenter stated that the co-location will negatively impact Dewey's ability to serve its special education students, including District 75 students.
- 57) A commenter stated that the co-location will diminish the resources provided to Dewey for English Language Learner ("ELL") programming.

- 58) A commenter stated the following:
- I have worked at two co-located schools and sharing space is a detriment because there is competition for resources and shared spaces, which are often overcrowded as a result.
 - Dewey is a Title I school and the students living below the poverty line are already at a disadvantage. Their school should be one place where they do not have to fight for space and resources.
- 59) A commenter stated that small schools have no interest for real learners and are often boring. They also make the system more segregated.
- 60) A commenter stated having one high school in a building causes far fewer problems than having two high schools in one building because having two schools will cause more headaches for teachers, which will take time away from serving students.

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

- 61) Multiple commenters submitted written statements indicating their general opposition to the co-location.
- 62) Multiple commenters submitted written statements in support of Dewey, particularly its comprehensive and diverse programming, its diverse student body, and its continued progress.
- 63) Multiple commenters submitted written statements stating that Dewey was not included in the High School Directory which led to declining enrollment and performance as parents and students were under the impression that the DOE was closing Dewey.
- 64) Multiple commenters submitted written statements stating that the DOE should provide additional resources and support to Dewey, allow it to continue to expand its programming, and allow it to increase its enrollment.
- 65) A commenter submitted a written statement stating that if the new school is a CTE school it should be co-located with William Grady High School, which also has CTE programming.
- 66) A commenter submitted a written statement stating the following:
- Will Dewey still have access to the many after school activities and clubs? Will the Robotics team still be able to work on its projects?
 - The relationships with teachers and peers that I have created will be in jeopardy if this proposal is approved.
- 67) A commenter submitted a written statement stating the following:
- Dewey helped me tap into my talent and set me up for my future success.
 - Co-location with another school will take resources and waste administrative time and is another blow to a school that does not need it.
 - The DOE has forgotten what is essential outside of data-driven decision-making.
- 68) A commenter submitted a written statement stating the following:

- a) Dewey was once a prestigious school and the DOE tried to close it.
 - b) The new high school should be co-located with Grady, not Dewey.
 - c) Let Dewey grow in academics once again and co-locate the new school elsewhere.
- 69) A commenter stated that this proposal will destroy Dewey and instead the DOE should give Dewey more resources to succeed.
- 70) A commenter stated that the DOE should find another underutilized building in which to place the new school.
- 71) CEC 21 submitted a formal resolution opposing the proposal which was passed on July 17, 2013. The resolution's reasoning is also set out in comment 72 below.
- 72) CEC 21 submitted the following comments:
- a) The proposal should be rescinded or at a minimum delayed.
 - b) The EIS misrepresents the building utilization rate considering the DOE's plans to construct at least six additional full-size classrooms in K540. The EIS' calculation of K540's utilization rate of 68% grossly under represents actual enrollment. According to Principal Elvin's comments at the hearing on October 23, 2013, 21K540's enrollment is higher than EIS projections by approximately 300 students yielding a building utilization rate of 80% instead of the 68% rate in the EIS. The building walkthrough completed by the Office of Space Planning occurred on June 5, 2013, which was before the start of the 2013-2014 school year and thus would not have had current enrollment figures. The DOE should recalculate the utilization rate using current data and conclude that the 80% utilization rate is too high to accommodate a new district high school co-location.
 - c) The EIS fails to justify a need for a new district high school, which would cause a gross misuse of funds, unnecessary resource allocation, and excessive hiring, when Dewey has demonstrated enrollment growth, improved performance, and improving graduation rates.
 - d) The EIS is contradictory because in one place it states that there is sufficient space in K540 to accommodate the co-location and in another place it states that the DOE needs to build six additional full-size rooms to accommodate the co-location.
 - e) The inconsistencies, miscalculation, and lack of justification should warrant withdrawing or delaying this proposal.
- 73) One commenter submitted a written statement stating that Sara Kaufman stated under sworn testimony that the new high school would be a CTE school and in the upcoming months the community would be introduced to the new leader. Subsequent engagement to the community indicated that the new school would not be CTE school.
- 74) Bill DeBlasio and Office of the Public Advocate submitted a comment calling for a moratorium on all school closures and co-locations for this year.
- 75) An alumnus submitted a written comment opposing the proposal on the grounds that K540's currently utilization is approximately 80%; that Dewey was left out of the high school directory; Dewey was impacted by Hurricane Sandy; and Dewey's recent performance.

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

Comments 3(a), 3(d), 12(a), 13(b), 13(c), 16(a), 16(b), 38(b), 47(a), 50, 52(a), 59, and 67(a) are not directly related to the proposal and thus do not require a response.

Comments 3(b), 3(c), 3(e), 5, 11(a), 12(f), 13(a), 13(e), 14(e), 15(a), 15(c), 15(d), 18(a), 19(e), 27(a), 38(c), 40(b), 43(a), 47(b), 47(d), 51(a), 51(d), 61, 67(c), 71, 72(a), 72(e), and 75 voice general opposition to the proposal. Comment 74 specifically calls for a moratorium on school closures and co-location.

The DOE notes there is a need for increased options for students in the Brooklyn, including those students located in District 21. The DOE strives to ensure that all students in New York City have access to various educational options at every stage of their education.

Although the DOE recognizes that some members of the community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities at K540 will be able to create productive and collaborative partnerships.

Comments 6, 12(c), and 49(a), expressed support for Principal Elvin, stating that she has provided great leadership that is moving Dewey in a positive direction.

The DOE acknowledges the support Principal Elvin has from the community and is pleased to receive this feedback. The DOE anticipates that this proposal will not impact the ability of Dewey's leadership to continue to support its student and to reinforce a strong school culture.

Comment 11(d) asserts that the DOE does not believe that Dewey deserves to occupy a whole building.

The DOE does not make determinations regarding the co-location of a new school based on a conclusion that the existing school is undeserving. 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.

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.

Comments 1(b), 3(g), 7, 14(d), 18(b), 41(a), 51(c), 54(b), 63, 68(a) and 75 assert that Dewey's enrollment suffered because it was not included in the 2012-2013 High School Directory. Some comments imply that this was a deliberate effort by the DOE to reduce enrollment at Dewey and create under-utilized space in K540.

Dewey did not appear in the 2012 High School Directory because it was a Turnaround School that the DOE had proposed to close and replace with a new district high school called Shorefront High School of Arts and Sciences at John Dewey Campus. The name of the new high school was placed in the directory. That proposal was withdrawn after an arbitration decision and during Round 1 of the high school admissions process, the DOE immediately corrected the High School Directory to reflect the availability of Dewey as a District 21 high school choice.

Comments 2(b), 12(b), 15(b), 19(a), 19(b), 32, 34(a), 46, and 49(d) assert that the DOE previously attempted to close Dewey.

On March 12, 2012, the DOE issued an EIS proposing the closure of Dewey and its replacement with a new district high school that was going to be called Shorefront High School of Arts and Sciences at John Dewey Campus. This proposal was due to Dewey's status as a Turnaround High School due to low performance. Even though this proposal was approved by the PEP, after an arbitration decision the DOE did not proceed with closing Dewey. Contrary to one of the comments, the DOE is not now trying to phase out Dewey.

Comments 1(a), 3(f), 10(b), 11(f), 18(c), 20, 21(a), 25, 26, 29, 33(b), 43(b), 49(c), 55(c), 72(b), and 75 assert that the enrollment projections stated in the EIS are incorrect based on Dewey's enrollment on register as of October 2013. Additionally, commenters state that Dewey's current enrollment places K540's utilization rate at closer to 80% than 68% as stated in the EIS. Comments 10(a), 17(d), and 23(b) specifically state that the co-location will cause larger class sizes.

The enrollment projections in the EIS are based on 2013-2014 budgeted projections at Dewey at the entry point grade level, and assume that the same number of students will articulate up and that there will be stable incoming enrollment at the entry point grade.

While Dewey's current enrollment on register is above projections, it is anticipated that enrollment at Dewey will stabilize in a way that is closely aligned with projections. At the beginning of the school year through October 31st, enrollment fluctuates and registers typically include students who will ultimately be classified as Long Term Absences ("LTAs"). LTAs are not included in a school's total enrollment and are not ultimately taken into account when determining space allocations. The DOE's projections are based on prior year enrollment numbers which exclude LTAs.

Comments 1(d), 3(h), 4, 11(c), 14(b), 39, 40(a), 52(b), 55(a), 62, 66(b), 72(c), and 75 express support for Dewey, state that Dewey has continually improved performance, citing its graduation rate of 74%, current Progress Report grade of B and their Quality Review rating of Proficient.

The DOE acknowledges that Dewey has made progress which is reflected in its Progress Report grade and Quality Review rating. However, this does not preclude the siting of a new high school option in the district, given available space. The DOE aims to provide additional parent choice to all families across New York City regardless of performance at existing schools and does not believe that the co-location of a new district high school will jeopardize the progress Dewey has made.

Comments 1(e) and 10(d) imply that District 21 parents do not need additional high school choice.

As previously stated, the DOE notes there is a need for increased options for students in Brooklyn, including those students located in District 21. For example, demand for District 21 high schools is lower than the average for high schools in Brooklyn and across the city. The DOE strives to ensure that all students in New York City have access to various educational options at every stage of their education. This proposal aims to provide a new option for these students.

Comment 1(f) asserts that the co-location will cause students to eat a late breakfast. Comments 37(b), 53, 58(a), and 58(b) assert that the new high school will have more access to shared space and resources.

The final shared space schedule will be collaboratively drafted by the Building Council if the proposed co-location is approved by the PEP. There is no evidence that the co-location will cause students to eat a late breakfast.

If conflicts emerge and progress is impaired, the Building Council will follow the dispute resolution procedures outlined in the Campus Policy Memo available at the following link:
<http://schools.nyc.gov/community/campusgov/KeyDocuments/CampusMemo.htm>.

Comments 1(c), 2(a), 12(d), 54(a), and 55(b) state that Dewey is still recovering from the aftermath of Hurricane Katrina. Specifically, the commenters note that the electrical system is still not fully working.

The DOE acknowledges that K540's electrical system was damaged by Hurricane Sandy and there is work underway to repair damage inflicted by the storm. This building had a generator which caused fumes to permeate the building. The DOE removed the generator and connected a temporary switch gear to Con Edison. The temporary repairs are complete and K540 passed inspection in September of 2013. Pending review and approval by the Federal Emergency Management Agency ("FEMA"), there will be a permanent repair to install the permanent switch gear. The review will take place on FEMA's schedule.

The DOE does not believe that the co-location of the new district high school will impact the progress of these repairs.

Comments 2(c), 8, 9(a), 10(e), 13(d), 14(a), 17(a), 18(d), 19(d), 30, 31, 37(a), 40(c), 41(b), 44, 54(c), 55(d), 64, 68(c), and 69 assert that the DOE should listen to the Dewey community and provide additional support and resources to Dewey to allow the school to grow.

The DOE appreciates all feedback from the community regarding a proposal. When the EIS was issued, it was made available to the staff, faculty, and parents at Dewey and P721K@K540 and on the DOE's Web site. In addition, the DOE dedicated 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 provide further feedback.

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 at K540 will be able to create productive and collaborative partnerships.

All schools receive support and assistance from their superintendents and [Children First Networks](#), a team that delivers operational and instructional support directly to schools. Schools receive supports as part of system-wide efforts to strengthen all schools; and they also receive individualized supports to address their particular challenges. The DOE does everything we can to provide schools with leadership, operational, instructional, and student supports.

The DOE does not believe that this proposal will impact the amount of resources provided to Dewey or that it will prevent the school from being able to grow and succeed.

Comments 3(i), 10(f), 17(c), 21(b), 47(c), 60, and 67(b) indicate that having two administrations co-located in the same building is an inefficient use of resources.

The DOE does not believe that having co-located schools is a waste of resources. Co-locations allow the DOE to use its limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because the DOE has scarce resources and a demand for more options.

Comments 9(b), 9(c), 12(e), 17(b), 19(c), and 73 assert that the community does not know anything about this new high school, nor does it know who the new leader will be.

The DOE's Office of New Schools is responsible for selecting effective leaders to place in new schools. The academic focus and programmatic direction of any new district school is subject to the vision of the new leader selected. The Office of New Schools is currently in the process of selecting new leadership for the new high school. If this proposal is approved and a new leader is matched, the DOE will inform the community of the name of that leader and the focus of the new district high school.

During her statements to the New York City Council, Sara Kaufman, Chief Portfolio Officer of the Office of Portfolio Management, misspoke when indicating that the new district high school would have a CTE focus. As discussed above, that decision has not yet been made.

Comment 10(c) states that the pre-medicine and visual arts are not listed in the EIS.

The EIS does state that Dewey offers several programs, including Visual and Media Arts and Pre-Med and Health Careers programs.

Comments 9(d), 10(g), 11(g), 18(e), and 49(b) indicate that the proposal is rushed and some allege that this is because the DOE wants proposals approved before the start of the new mayoral administration.

This proposal, and the others that will be voted on by the PEP on October 30, 2013, represent a continuation of the 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 the DOE's extensive strategic planning to advance its proven strategy of bringing high-quality district and charter schools online, as well as its 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
- The Office of Space Planning to plan school placement and implement any needed facilities upgrades; and
- Charter schools to submit proposals for facilities matching; and
- The Division of Facilities to review and conduct work on approved proposals.

Comment 11(b) claims that the DOE is deliberately filling Dewey with OTC students.

As stated in the EIS, Dewey has traditionally accepted OTC students and will continue to accept OTC students.

OTC placement is a term that refers to the method of enrolling students who need a school assignment because they were not part of any admissions process for entry grades and/or were not enrolled in a NYC school at the time school started. Most of these students fall into one of four categories:

- New to the New York City school system; or
- Left the New York City school system and have returned; or
- Are seeking transfers (based on the guidelines outlined in Chancellor's Regulation A-101); or
- Students who did not participate in the High School Admissions Process for some other reason.

When a student arrives for an OTC placement, his/her school assignment is determined by his/her interest, home address and which schools have available seats, and, where applicable, transfer guidelines. The student visits a Borough Enrollment Office where he/she meets with a counselor who reviews options that will meet the student's needs.

There is a peak enrollment period occurring just prior to and into the opening of school when thousands of students arrive. Prior to the start of the peak enrollment period, schools are reminded about the number of OTC students they can expect. This number is based on a school's enrollment projection and the results of the admissions process.

If the Division of Portfolio Planning determines that additional OTC seats may be needed, the number of seats available are reviewed and – if space allows – adjusted in those schools where the admissions methods are limited unscreened, educational option, or unscreened.

The DOE adds OTC seats as needed and does not deliberately assign unnecessary OTC placements to impact a school's culture or performance. For 2012-2013, 7% of Dewey's students were OTC placements; this is in line with the District 21 high school average of 6%.

Comments 14(c), 22, 23(a), 24, 27(b), 28, 33(a), 34(b), 36, 38(a), 45, 56, 57, and 66(a) assert that the co-location will have a negative impact on Dewey's programming, extracurricular activities, and the resources allocated to special education and ELL students.

As discussed in the EIS, the proposed co-location is not expected to impact the instructional programming or extracurricular activities offered at Dewey, including the robotics club, but the co-location may change the way some 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 extracurricular programs though the specific programs offered at a given school are always subject to change. It is difficult to predict precisely how those changes might be implemented as decisions will rest with school administrators and will be made based on student interests and available resources. That is true for any City school as all schools modify extracurricular offerings annually based on student demand and available resources.

In addition, the co-location is not expected to impact the resources provided to Dewey to serve its special education and ELL populations. Dewey will continue to provide all students with disabilities with mandated services in accordance with their IEPs and ELL students at Dewey will also continue to receive mandated services.

Comments 35 and 48 cite safety issues, claiming that the co-location will cause safety issues such as overcrowded hallways and discipline issues.

The DOE does not believe that the co-location will cause safety issues. 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 principals when it identifies the need for additional security measures.

Comment 42 asserts that parents prefer Dewey because it is a single school in a single building.

While some parents might prefer single-school buildings, co-locations ultimately allow for more and better school options, which parents have indicated is important to them.

Comments 51(b), 65, 68(b), and 70 state that the DOE should place the new high school in a different building, such as William Grady High School.

After a careful review of buildings that appear on the Underutilized Space Memorandum published annually on the DOE's web site, the DOE has determined that K540 is the most appropriate and efficient space in which to site the new district high school.

Comment 72(d) asserts that the EIS is contradictory regarding whether there are enough full-size rooms in the building to accommodate the co-location.

According to the Blue Book, K540 has the capacity to open and co-locate the new district high school at scale. Building K540 includes rooms that can be reconfigured, through construction, and can be used more efficiently to maximize the capacity of the building. These changes will generate enough full size rooms to accommodate both Dewey and the new high school.

Changes Made to the Proposal

No changes have been made to the proposal.