



**Department of
Education**

Dennis M. Walcott, Chancellor

Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Opening and Co-location of a New Middle School (16K681) with Existing Schools Frederick Douglass Academy IV Secondary School (16K393) and P.S. 026 Jesse Owens (16K026) in Building K026 Beginning in 2012-2013

Date of Panel Vote: February 9th, 2012

A copy of the Educational Impact Statement (“EIS”) pertaining to this proposal can be found at the main office of Frederick Douglass Academy IV Secondary School, and online at the following website: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals>

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to open and co-locate a new middle school, I.S. 681 (16K681”, “I.S. 681”), at 1010 Lafayette Avenue, Brooklyn, NY 11221 in Community School District 16 in building K026 (“K026”). I.S. 681 would be a new choice middle school that would serve students in sixth through eighth grades and admit students through the Middle School Choice Process using a limited unscreened selection method. If this proposal is approved, in 2012-2013, I.S. 681 will begin enrolling 85-95 students in sixth grade; it would add one grade per year until it is full scale and serves sixth through eighth grades in 2014-2015.¹

I.S. 681 would be co-located in the K026 building with the following schools: Frederick Douglass Academy IV Secondary School (16K393, “Frederick Douglass Academy IV”) and P.S. 026 Jesse Owens (16K026, “P.S. 026”).

Frederick Douglass Academy IV is an existing choice secondary school that currently serves sixth through twelfth grades and admits students through the District 16 Middle School Choice process and through the High School Admissions process. P.S. 026 is an existing zoned elementary school serving students in grades kindergarten through five. P.S. 026 also offers a pre-kindergarten program.

In a separate EIS published on December 22, 2011 the DOE has proposed to gradually truncate the middle school grades of Frederick Douglass Academy IV because of its low performance and inability to turn around quickly to better support student needs.² If the truncation proposal is approved, Frederick Douglass Academy IV will no longer admit sixth grade students after the conclusion of the 2011-2012 school year. One middle school grade would then be truncated in

¹Enrollment projections are based on a standard phase-in plan of 3 general education sections and 1 self-contained section per entry grade in the first year. Actual enrollment in 2012-2013, however, will depend on applicant demand.

²<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Feb32011Proposals>

each subsequent year. During the 2012-2013 school year, Frederick Douglass Academy IV will serve students in seventh through twelfth grade. In 2013-2014, Frederick Douglass Academy IV will serve students in eighth through twelfth grade. Frederick Douglass Academy IV will no longer serve middle school students after June 2014.

In 2010-2011, K026 had a target capacity of 1,189 students, but the building enrolled a total of 799 students, yielding a target building utilization rate of 67%. In the current 2011-2012 school year, the building serves a total of 752 students, yielding a target utilization rate of 63%.

In 2014-2015, once Frederick Douglass Academy IV has completed its truncation and I.S. 681 is at full-scale, there will be approximately 783-913 students served in the building, which would yield a target building utilization rate of approximately 66%-77%. The DOE anticipates that I.S. 681 would replace the middle school seats that would be lost as a result of the truncation of Frederick Douglass Academy IV and would provide a new educational option for families in District 16. If the proposal to truncate Frederick Douglass Academy IV is not approved, the DOE would reevaluate space availability at the K026 building and issue a revised EIS regarding the opening of I.S. 681, if necessary.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at building K026 on January 30, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 140 members of the public attended the hearing, and approximately 21 members of the public spoke. Present at the meeting were Principal Elvin Crespo and Roland Robertson of the Frederick Douglass Academy IV School Leadership Team (“SLT”), Victoria Willis and Marta Torres of the P.S. 26 SLT and President Pegye Johnson of Community Education Council (“CEC”) 16. Deputy Chancellor for Talent, Labor and Innovation David Weiner served as the Chancellor’s Designee. Also present were Brooklyn High School Superintendent Karen Watts, and Yvonne Soto, Carrie Marlin, Caitlin Tommasulo, Chris Casarez, Antonio Whitaker, and Toby Shepherd from the Department of Education.

The following comments and remarks were made at the joint public hearing:

1. Martha Torres, the co-president of the Parent Teacher Association of P.S. 026 Jesse Owens, made the following statements:
 - a. She is concerned that bringing in a third school will make it even more difficult to keep P.S. 026 students separate from students at Frederick Douglass Academy IV.
 - b. She is concerned that bringing in a third school will make it even more difficult to schedule time in the building’s shared spaces (including the auditorium, the cafeteria and other shared spaces).
 - c. No one has been consulted with, or has received information regarding, the new school and she wants to know how the DOE proposes that phasing in a new school will not affect students at P.S. 026.

2. A commenter stated that Frederick Douglass Academy IV and the new school being proposed for K026 need their own building and should not share space with elementary school students.
3. The UFT representative for District 16 stated that the DOE does not want community input and this is evidenced by the fact that the DOE has already hired a principal for a new school designed to replace the middle school grades Frederick Douglass Academy IV.
4. A commenter asked how the DOE proposes to deal with shared spaces, including the cafeteria, with a third school in the building?

In addition to collecting feedback at the Joint Public Hearing referenced above, the DOE solicited feedback on this proposal via email, telephone and an internet feedback form.

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

5. Class Size Matters (“CSM”), submitted written comments objecting to all of the proposed phase-outs and truncations proposed by the DOE. In opposing the DOE’s proposal to phase-out and eventually close these schools, the CSM comments cited the following reasons: (1) none of the Educational Impact Statements for the proposals include discussion of how the proposed phase-outs or, where applicable, the co-locations would affect class size; (2) the Citywide Instructional Footprint does not include class size standards; (3) the Educational Impact Statements use utilization figures from the DOE’s Blue Book, which does not take into account the need to reduce class sizes in schools Citywide; (4) the community members, faculty, and families of schools that have been proposed for phase-out have opposed the proposed phase-outs and truncations; (5) the schools that have been proposed for phase-out and/or truncation have high concentrations of “at-risk” students, as defined as English Language Learner students, students with disabilities, and economically disadvantaged students.

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

Comment 1(a, b), 2, and 4 relate to the co-location of Frederick Douglass Academy IV with P.S. 026 and I.S. 681 during the time when Frederick Douglass Academy IV truncates and while I.S. 681 phases in.

If both this proposal and the proposal to truncate the middle school grades of Frederick Douglass Academy IV are both approved, space allocations for P.S. 026, Frederick Douglass Academy IV,

and I.S. 681 will continue to meet the DOE’s standards for elementary, middle and high school organizations as described in the DOE’s Citywide Instructional Footprint.

Moreover, I.S. 681 is projected to enroll new students at approximately the same rate that Frederick Douglass Academy IV is projected to articulate students out through the processing of truncating one grade per year. The table below, included in the EIS accompanying this proposal, displays enrollment at each school organization, total building enrollment, and total building utilization over the course of the proposed truncation and replacement of Frederick Douglass Academy IV’s middle school grades and the phase-in of I.S. 681.

School Name	2010-2011 Audited Register	2011-2012 Enrollment	2012-2013 Projected Enrollment	2013-2014 Projected Enrollment	2014-2015 Projected Enrollment
Frederick Douglass Academy IV	451	445	345 - 405	290 - 340	250 - 290
I.S. 681	-	-	85 - 95	170 - 190	255 - 285
P.S. 026	348	307	283 - 343	278 - 338	278 - 338
Total Building Enrollment	799	752	713 - 843	738 - 868	783 - 913
Utilization	67%	63%	60% - 71%	62% - 73%	66% - 77%

Comments 1(c) and 3 pertain to the process of engaging the community regarding the proposed phase-in of I.S. 681.

The DOE is committed to engaging with the community, including its elected representatives, for all proposals that require a significant change in school utilization, as detailed in Chancellor’s Regulation A-190. Prior to this Joint Public Hearing, the DOE held “early-engagement” meetings with Frederick Douglass Academy IV Secondary School staff and families. Additionally, the DOE has solicited feedback regarding this proposal via a dedicated phone line, a dedicated email address, and a dedicated online feedback form. The DOE will continue to engage the community at every possible point regarding this and other proposals for the 2012-2013 school year.

The DOE’s Office of New Schools works year-round to develop pipeline of potential school leaders in anticipation of various school leader vacancies. If the proposals to truncate and replace the middle school grades of Frederick Douglass Academy IV are approved, a proposed

new leader would be hired via Chancellor's Regulation C-30, which governs the selection, assignment and appointment of principals and assistant principals.

Comment 5 concerns class size.

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 schools' longstanding performance struggles, we believe that phasing out certain schools and/or creating new educational options by co-locating new schools will best serve the families in these communities.

With respect to CSM's comments regarding the particular types of students who attend phase-out schools, it should be noted that schools progress report grades are based in part on a comparison of the school with peer schools serving similar populations of students. Poor performance report grades thus indicate that a school is not serving its students well, both objectively and by comparison to other schools serving similar students. Moreover, the new schools proposed to open are anticipated to serve student populations similar to the phasing out school.

Changes Made to the Proposal

In response to public feedback, the following changes to the proposal were made:

- No changes have been made.