Department of Education
Dennis M. Walcott, Chancellor

Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Grade Truncation of I.S. 171 Abraham Lincoln (19K171) to a 6-8 School in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

I.S. 171 Abraham Lincoln ("I.S 171) is an existing zoned middle school located in building K171 ("K171"), at 528 Ridgewood Avenue Brooklyn, NY 11208, in Community School District 19. It currently serves students in fifth through eighth grade. I.S. 171 is the only school organization located in K171.

The New York City Department of Education ("DOE") is proposing to implement a "grade truncation," meaning that the school would no longer enroll fifth grade students, after the 2011-2012 school year. If this proposal is approved, at the close of the 2011-2012 school year, all fifth grade students at I.S. 171 who meet promotional standards would be promoted to sixth grade. Those students would have the choice to continue at I.S. 171 or they could participate in District 19 Middle School choice. If an I.S. 171 fifth grade student does not meet the promotional standards at the conclusion of the 2011-2012 school year and is required to repeat the grade in the 2012-2013 school year, the DOE will seek to place that student in a fifth grade class at a nearby elementary school. If such a placement is not feasible, then the DOE will find an alternative District 19 placement for that student. Beginning in September 2012, I.S. 171 would only serve students in sixth through eighth grade. This is a school-initiated truncation request.

Prior to May 2011, students in District 19 could attend their zoned middle school, or they could apply to middle schools that managed their own admissions processes on a school-by-school basis. These schools are called "choice schools" and they admit students living in a defined catchment area, which can be district, borough, or citywide depending on the nature of the school, and do not offer priority to students living in a particular zone. On May 17, 2011, the District 19 Community Education Council voted to adopt "Middle School Choice" for admissions beginning in the 2012-2013 school year. Middle School Choice allows students to use a single application to rank and apply to middle schools throughout the District, including zoned middle schools outside the zone in which they reside. Zoned students still have priority for admission to zoned schools, but other District 19 students will also be eligible to attend those schools by the choice process.

Middle schools typically enroll students beginning in sixth grade, but I.S. 171 begins serving

students in fifth grade. Once the District 19 Middle School Choice becomes effective, I.S. 171 as it is currently configured will not be aligned with the other middle schools in the district that serve sixth through eighth grade students. Currently, P.S. 007 Abraham Lincoln (19K007, "P.S. 7") and I.S. 171 are the only two schools in District 19 which serve irregular grade spans in the K-8 realm. In a separate Educational Impact Statement ("EIS") published in December 2011, the DOE is proposing to expand P.S. 7 from a kindergarten through fourth grade school to a kindergarten through fifth grade school. Because the standard exit point for an elementary school is fifth grade, when Middle School Choice takes effect for admissions as of 2012-2013, the majority of students in District 19 will be applying to I.S. 171 for sixth grade. If I.S. 171's fifth grade is not truncated and if the proposal to expand P.S. 7 is approved, the enrollment in any future I.S. 171 fifth grade class would be adversely affected as all elementary students in District 19 will be attending an elementary school that serves kindergarten through fifth grade and would therefore likely not enroll in I.S. 171 for fifth grade.

This proposed grade truncation will help standardize middle school application and entry grades in District 19. Additionally, having students start middle school through multiple entry grades (fifth grade students who may enroll from a kindergarten through fourth grade school and sixth grade students who may enroll from a kindergarten through fifth grade school) creates challenges for students and the school as a whole. Having students enter in multiple years is also challenging for teachers and leadership from an instructional perspective.

Changing I.S. 171's grade span from fifth grade to eighth grade to sixth grade to eighth grade would reduce the school's enrollment by approximately 110-125 students, freeing up additional space that I.S. 171 could use to accommodate existing sixth through eighth grade students or to meet other needs (e.g., art room, resource center, etc.).

The details of this proposal have been released in an Educational Impact Statement ("EIS") which can be accessed here: http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals.

Copies of the EIS are also available in I.S. 171's main office.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at K171 on January 11, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 78 members of the public attended the hearing and two people spoke. Present at the meeting were: Principal of I.S. 171, Barbara Kendall; District 19 Community Education Council ("CEC") representative Erica Perez; I.S. 171 School Leadership Team ("SLT") representative, Mercedes Perez; I.S. 171 Parent-Teacher Association representative, Dennis Camacho; New York State Senator Martin Malave Dilan, and New York State Assembly Member Rafael Espinal, and the Chancellor's Designee, District 19 Community Superintendent Rose-Marie Mills.

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

1. The SLT representative stated that the SLT supports the proposal because fifth grade students are too young for I.S. 171's middle school environment.

2. The Parent-Teacher Association's representative expressed support for the proposal and stated that the space that will be made available by the truncation should be used to reduce class sizes in I.S. 171's sixth through eighth grade classes.
3. The CEC representative expressed support for the proposal.
4. New York State Assembly Member Rafael Espinal expressed support for the proposal and stated that the space that will be made available by the truncation should be used to lower class sizes at I.S. 171, and not to co-locate another school organization in K171.
5. New York State Senator Martin Malave Dilan expressed support for the proposal and reiterated that the vacant space that will be available should be used to serve I.S. 171's students.
6. The principal of I.S. 171 stated that the proposal would benefit I.S. 171.
7. A commenter stated that the proposal made sense and that she would oppose a co-location in K171.
8. A commenter supported the proposal.

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

9. A commenter requested more information about the proposal.

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 Enrollment Capacity Utilization Report ("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.

CSM specifically suggests that this is a proposal to phase out I.S. 171 school phase outs and to co-locate a new middle school co-location, which would lead to 81-93% utilization of building K171.

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

- Comments 2, 4, 5, and 7 relate to the space that will be made available as a result of the proposed truncation. As stated in the EIS, truncating I.S. 171's grade span from fifth through eighth grade to sixth through eighth grade would reduce I.S. 171's enrollment by approximately 110-120 students. The space could be used to accommodate existing sixth through eighth grade students or to meet I.S. 171's other needs, such as providing additional art rooms or resource centers.

  At this time, the DOE has no proposed additional uses for the building should the grade

truncation take place. Any future proposals for use of the space that involve a significant change in school utilization would begin with community engagement to discuss the community's needs and would be addressed in a separate proposal and EIS in accordance with Chancellor's Regulation A-190.

- Comment 9 requested more information about the proposal. As stated above, copies of the EIS are available in I.S. 171's main office on the DOE's Web site at http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals.

All other comments received were in support of the proposed re-siting and, therefore, do not need to be addressed.

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.

This is a proposal to truncate I.S. 171 from serving students in fifth through eighth grade to serving students in sixth through eighth grade. It is not a proposal to phase out I.S. 171, and the DOE has not proposed to co-locate a new middle school in K171. If the proposal is approved, K171's utilization would actually decrease from 77% in 2011-2012 to 64-67% in 2012-2013.

Changes Made to the Proposal

No changes have been made to this proposal.