



Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Opening and Co-location of New High School 17K745 with Existing Schools the International Arts Business School (17K544), the School for Human Rights (17K531), the School for Democracy and Leadership (17K533), the High School for Public Service: Heroes of Tomorrow (17K546), and two District 75 inclusion programs (75K036, P036@Wingate and P036K@H544K) in Building K470 Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to open and co-locate a new high school (17K745) in school building K470 (“K470” or “George Wingate Campus”) located at 600 Kingston Avenue, Brooklyn NY 11203, within the geographical confines of Community School District 17 (“District 17”). If this proposal is approved, 17K745 would be co-located with International Arts Business School (17K544, “International Arts Business”), an existing school which serves students in grades nine through twelve, School for Human Rights (17K531, “Human Rights”), an existing school which serves students in grades six through twelve, the School for Democracy and Leadership (17K533, “Democracy and Leadership”), an existing school which serves students in grades six through twelve, and the High School for Public Service: Heroes of Tomorrow (17K546, “HS for Public Service”), an existing high school which serves students in grades nine through twelve in K470. 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.

In addition, K470 houses two sites of a multi-side District 75 inclusion program (75K036): P036K@H544K, which serves students in grades nine through twelve in International Arts Business’ general education classes, and P036@Wingate, which serves students in Human Rights’ general education classes.

International Arts Business currently serves a total of 400 students in ninth through twelfth grades. In a separate Educational Impact Statement (“EIS”) posted in December 2011, the DOE has proposed to phase out and eventually close International Arts Business. This EIS can be accessed on the DOE’s Website at

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb12011Proposals>.

International Arts Business also offers a Career and Technical Education (“CTE”) pathway in the high school grades. If the proposed phase out of International Arts Business is approved, beginning in September 2012, International Arts Business will no longer be an option for new students interested in CTE programming. Please refer to the aforementioned EIS for more information on impact to CTE students.

In the event that the phase-out of International Arts Business is not approved, the DOE would re-examine the availability of space in the building, and may, as appropriate, revise its proposal to co-locate 17K745 in K470. Such a revised proposal would be described in a revised EIS. The DOE has proposed to phase out International Arts Business after an extensive review of data and community feedback indicating that the school is unable to turn around despite numerous efforts to improve instruction and school organization. As noted in the EIS posted in December 2011, International Arts Business students continue to struggle academically.

If the Panel for Educational Policy (“PEP”) approves the proposal to phase out International Arts Business, the school will no longer admit new ninth grade students after the end of this school year. However, International Arts Business will continue to serve students currently enrolled in the school. International Arts Business’s enrollment will decrease gradually over the next three years, and the school will complete phasing out in June 2015.

The proposed co-location of 17K745 in K470 is part of the DOE’s central goal to create new school options that will better serve future students and the community at large. 17K745 would be open to students through the Citywide High School Admissions Process, and would have a limited unscreened selection method. The new school would open during the 2012-2013 school year, when it would serve approximately 105-115 students in the ninth grade. 17K745 would gradually phase in by adding one grade per year. The school is expected to reach full scale in 2015-2016 and would serve approximately 420-460 students in grades nine through twelve.

The details of this proposal have been released in an 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 the main offices of International Arts Business, Democracy and Leadership, the HS for Public Service, P036@Wingate, and P036K@H544K.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at K470 on February 3, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Representatives from School Leadership Team (“SLT”) at every school organization in K470 were invited to participate. Approximately 138 members of the public attended the hearing and 28 people spoke. Present at the meeting were: the Chancellor’s Designee, Brooklyn High School Superintendent Karen Watts; District 17 Community Education Council (“CEC”) representatives Cassandra Townsley and Natasha Welsh; Citywide Council on High Schools (“CCHS”) representative Monique Lindsay; Principal of International Arts Business, Sheila Hanley; International Arts Business SLT representatives Pita Gay Nelson, Jessica Schrank, Gary James, and Allison Smith; Principal of Democracy and Leadership, James Olearchik; Democracy and Leadership SLT

representative Tyler Brewster; and Principal of HS for Public Service, Ben Shuldiner. Representatives of P036K@H544K’s SLT were invited to attend the hearing, and their attendance had been confirmed, but they ultimately chose not to attend. Representatives of Human Rights’ SLT were invited to attend the hearing, but they chose not to attend. New York City Council Member Mathieu Eugene also attended the hearing.

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

1. The Principal of HS for Public Service opposed the proposal and related concerns about shared spaces in the building during the period when there will be five schools in the building.
2. A commenter asked how the phase-out would affect a community based organization, buildOn, which organizes students to provide community services over the weekend.

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

No written or oral comments regarding this proposal were received during the comment period.

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.

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

- Comment 1 relates to the proposed co-location of 17K745 in K470 and its possible impacts on the shared spaces in K470. The DOE recognizes that K470 has a cafeteria, an auditorium, a library, and a gymnasium that are currently shared among the co-located schools. As in other situations where schools are co-located, and as is the current practice in K470, the schools will need to share large common and specialty rooms in the building, such as the cafeteria, the gymnasium, 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.
- Comment 2 asked how the proposed phase-out would affect buildOn, a club that International Arts Business currently offers. It is difficult to predict precisely how

changes to the above offerings might be implemented, as decisions would rest with school administrators and would be made based on student interests and available resources.

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

No changes have been made to this proposal.