



Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Phase-out of P.S. 14 Cornelius Vanderbilt (31R014)
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 phase out and close P.S. 14 Cornelius Vanderbilt (31R014, “P.S. 14”), an existing elementary school located at 100 Tompkins Avenue, Staten Island, NY 10304, in Community School District 31, in building R014 (“R014”). P.S. 14 currently serves students in kindergarten through fifth grade and offers a pre-kindergarten program. The DOE is proposing to phase out and eventually close P.S. 14 based on its low performance and its inability to turn around quickly to better support student needs.

If this phase-out proposal is approved, P.S. 14 would no longer admit kindergarten students and would no longer offer grades one and two or its pre-kindergarten program after the conclusion of the 2011-2012 school year. Beginning in the 2012-2013 school year, after P.S. 14’s kindergarten, first grade, and second grade are phased out, P.S. 14 would serve one less grade in each subsequent year until it completes its phase-out and closes in June 2015. Current students in grades two, three, and four would continue to be served by P.S. 14 and would be supported as they progress toward completion of elementary school at P.S. 14. Current students in fifth grade will be supported as they transition to middle school. Students in kindergarten through second grade would be served in a new zoned elementary school, 31R078, to be opened in building R014 and proposed in a separate Educational Impact Statement (“EIS”). A pre-kindergarten program would also be offered by 31R078 in building R014 (pending continued availability of funding).

In a separate EIS posted on December 12, 2011 the DOE has proposed to “co-locate” a new zoned elementary school, 31R078, which would serve students in kindergarten through fifth grade when it reaches full scale in building R014 in 2015-2016. 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. If the proposal to co-locate 31R078 in R014 is approved, it would provide a new zoned elementary school for District 31 families and replace the seats lost by the proposed phase-out of P.S. 14. 31R078 would be co-located in R014 with P.S. 14 as it phases out. P.S. 14 is currently the only school located in R014.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at P.S. 14 on January 25, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 475 members of the public attended the hearing, and 48 people spoke. Present at the meeting were Dorita Gibson, Deputy Chancellor for Equity and Access, Community School District 31 Superintendent Erminia Claudio; District 31 Community Education Council President Sam Pirozzolo; CEC 31 members Tamica Fairley and Franca Okeiche; P.S. 14 School Leadership Team members Harold Williams, Joanne Singer, Barbara DellaSalla, and J. Wade; CCSE Co-chairperson Mike Reilly; Rebecca Rawlins and Drew Patterson from the Division of Portfolio Planning; Angel Daniels representing Councilwoman Debi Rose; Anthony Reinhart representing State Senator Lanza; Chris Lee representing Assemblyman Cusiuk; and Lonny Baon representing Assemblyman Totone.

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

1. Sam Pizzorolo, CEC 31 President, stated that the CEC does not agree with the proposal. He said that he does not agree with the rating system to determine that P.S. 14 is a “D” school, when it received an “A” a few years ago.
 - a. He asked why the mayor is closing schools that receive “A’s” and “B’s” on the progress reports.
 - b. He suggested a school model where children are grouped by their abilities to learn, offers extended day, and offers more art and music programs.
2. CEC member Tamica Fairley said that the CEC represents the views of the school and that they would like to see change but that they ask for support and partnership with the DOE.
 - a. She stated that closing the school would be demoralizing for the people who work so hard at P.S. 14.
3. CEC member Franca Okeiche stated that the CEC does not agree with the phase-out and that P.S. 14 needs to be provided with more resources to succeed.
 - a. She said that the parents need support because the children will not succeed without the parents.
4. CCSE Co-chairperson Mike Reilly stated that more funding is needed for supplies, books, and services at P.S. 14.
 - a. He stated that he does not believe that English Language Learners (“ELLs”) and students with Individualized Education Programs (“IEPs”) will not be affected by this proposal.
5. SLT member Harold Williams expressed concerns that “strangers” who are unfamiliar with the P.S. 14 community will come to work at the school.
 - a. He said that the DOE disregarded requests for support and additional funding for P.S. 14 and noted that decisions about P.S. 14 were not made by stakeholders of this community.

- b. He is opposed to changing the name of the school and says that a name change will change the “history” of the community and the people who live in Stapleton.
 - c. He questioned why the DOE does not take responsibility for the failures at P.S. 14.
- 6. Angel Davis, representing Councilmember Rose, spoke in opposition to the proposal noting that P.S. 14 needs more resources, funding and support from the DOE.
 - a) She noted that this is the first opportunity that the community has had to express concerns.
 - b) She said that P.S. 14 should be given the same supports and resources as P.S. 78.
 - c) She attributed the budget cuts to the decline in the Progress Reports from the “A” in 2008- 2009.
 - d) The councilmember questions why intensive supports were not given to P.S. 14 and states that P.S. 14’s “unique” population requires specific tailored supports.
- 7. Anthony Reinhart from Senator Lanza’s office spoke against the proposal, stating that P.S. 14 was greatly affected by the budget cuts, and is in need of more resources.
- 8. Lonny Baon, representing Assemblyman Tatone spoke about the stigma on 3rd, 4th, and 5th graders that will remain in P.S. 14.
- 9. Multiple commenters stated their support for their school, citing the hard work of the P.S. 14 staff and the support of staff and teachers in the school. Several commentators stated that their children are improving at the school academically.
- 10. One commenter stated that P.S. 14 was removed from the Persistently Dangerous Schools list because of the hard work of the staff and parents.
- 11. One commenter noted that class sizes at P.S. 14 had increased dramatically over the past several years.
- 12. Several commenters described several positions and programs that have been cut in recent years, stating that budget cuts have had a tremendously detrimental effect on the school and community.
- 13. One commenter asked why the DOE had taken so long to address performance issues at P.S. 14.
- 14. Several commenters stated that the proposal had come suddenly, since it was only in November that the community was given a warning that the school needed to improve.
- 15. One commenter asked why private consultants are using up funds that should be allocated to the school.
- 16. Multiple commenters raised concern about how the phase-out and replacement plan splits the school.
 - a. A commenter inquired why the phase-out and replacement plan does not include all students at P.S. 14. If the school needs change, that change should be applied to all students at the school. This proposal makes it seem that the DOE has given up on students in grades 3-5.
 - b. Another commenter added that bringing in new teachers will be traumatic for current students at P.S. 14.
- 17. One commenter expressed concern that meals are offered at the school and wanted to know where the children will go for meals if the school closes.
- 18. One commenter said that this is “not a closure, it is a way to fix” the school. She also distributed a document with accusations against the school administration.

19. Multiple comments were made that inquired specifically what the DOE has done to assist P.S. 14.
20. Multiple commenters felt that the decision to phase-out P.S. 14 has already been made.
21. One commenter noted a typographical error in the educational impact statement on page 4.
 - a) He also quoted page 6 of the EIS and questioned if services will be reduced for the students who remain in P.S. 14.
 - b) He encouraged everyone to attend the Panel for Educational Policy meeting.
22. Several commenters asked why P.S. 14 does not get the same help that other failing schools are getting.
23. A question was submitted that inquired the new school was already given a number (P.S. 78) if this was still a proposal and not final.
24. A question was submitted that inquired whether P.S. 14 will have the same resources as P.S. 78.

The DOE received comments at the Joint Public Hearing which did not directly relate to the proposal.

25. One commenter spoke in opposition to the Mayor spending funds on the new stadium in the Bronx.
26. Two commenters encouraged people to show their opinions by voting and by contacting their elected officials.

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

27. A designee for District 31 Presidents Council noted that P.S. 14 has made strides in implementing new strategies lately.
28. One commenter asserted that P.S. 14 needs more support and that they did not receive the support that other schools received.
29. One commenter wrote that she does not support a phase-out. She indicated that the cohorts that will remain at P.S. 14 will be at a greater risk for failure.
 - a) The commenter is in favor of complete closure of the school including all grades. The commenter feels that the remaining P.S. 14 students will have a lower quality of education. While the commenter supports the removal of the staff and administration at P.S. 14, she has concerns about the students that remain at P.S. 14.
 - b) The commenter does not agree with keeping two administrators in shared space.
 - c) The commenter inquired as to whether the students were informed of their options under the No Child Left Behind Act to be re-located to another school.
30. 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

Comments 1 and 6(c) relate to the decline in Progress Report scores since P.S. 14 received an "A" in 2008-2009 and attributes this decline to an unfair rating system and budget cuts.

In 2010, the New York State Education Department adjusted the "cut scores" on annual mathematics and English Language Arts exams, raising the score required for students to achieve proficiency on the exam. As a result, the percentage of students achieving proficiency fell significantly at schools statewide, including most New York City schools. Despite the "A" rating in 2008-2009, P.S. 14 was in the bottom 8% in Math proficiency Citywide and in the bottom 2% English proficiency Citywide. In 2009-2010, P.S. 14 was in the bottom 3% Citywide in Math proficiency and in the bottom 2% in English proficiency. P.S. 14 is not adequately helping students make progress, and that is what is reflected in the Progress Reports.

In regard to the budget cuts playing a role in the Progress report scores, budget cuts have not disproportionately impacted schools proposed for phase out. As with all other DOE district elementary schools, funding for P.S. 14 is allocated on a per-pupil basis, referred to as Fair Student Funding (FSF), which covers basic instructional expenses and which can, at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs. FSF also awards supplemental allocations on a per pupil basis to students who have additional needs and therefore cost more to educate. As with all other schools citywide, P.S. 14 may receive additional categorical funding based on student characteristics and needs. For example, federal Title I funding is awarded to schools based on the proportion of low-income students they enroll. P.S. 14 is currently a Title I school.

Comment 1(a) pertains to the mayor's decision to close schools that receive "A's" and "B's" on Progress Reports.

The DOE notes that a lengthy discussion of the rationale behind closing P.S. 14 is included in the EIS. As stated in the EIS, schools are identified for possible phase-out for the following three reasons: (1) they received poor grades on their annual Progress Report; (2) they received a poor rating on their annual Quality Review; or (3) they have been identified

by the New York State Education Department (“SED”) as Persistently Low Achieving (“PLA”). Specifically, under the DOE’s accountability framework, all schools that receive a “D” or “F”, or a third consecutive grade of “C” or lower on their annual Progress Report and all schools that received a rating of Underdeveloped on their most recent Quality Review are evaluated for intensive support or intervention, including the possibility of phase-out. Elementary and middle schools that have average math and English Language Arts (“ELA”) proficiency rates that are higher than the district average, which earned a Well Developed or Outstanding rating on the quality review, which received an “A” or “B” on the 2010-11 Progress Report, or which are receiving a Progress Report for the first time are not considered for phase-out. In particular, the following factors account for why P.S. 14 is being proposed to phase out this year:

- The overwhelming majority of P.S. 014 students remain below grade level in English and Math. Last year, only 23% of students were performing on grade level in English – putting the school in the bottom 4% of elementary schools Citywide in terms of English proficiency. Only 31% of students were performing on grade level in Math – putting the school among the lowest-performing elementary schools Citywide in terms of Math proficiency.
- P.S. 014 is not adequately helping students to make progress. P.S. 014 is in the bottom 9% of elementary schools Citywide in terms of learning growth in English and the bottom 10% of elementary schools Citywide in terms of learning growth in Math. Learning growth measures annual student growth on State ELA and Math tests relative to similar students. If these conditions persist, P.S. 014 students will fall further behind their peers in other schools.
- The Progress Report measures the progress and performance of students in a school as well as the school environment, compared to other schools serving similar student populations. P.S. 14 earned a “D” grade on its 2010-11 annual Progress Report, including an F grade for Student Performance and a D grade for Student Progress.
- The Quality Review uses a four-tiered rubric (well-developed, proficient, developing, underdeveloped) to measure how well a school is organized to support student achievement. P.S. 014 was rated “Developing” on its most recent Quality Review 2010-2011, indicating deficiencies in the way that the school is organized to support student learning.

Comment 1(b) suggests a school model in which children are grouped by their abilities to learn, offers extended day, and offers more art and music programs.

The Department of Education supports a model of differentiated instruction which involves providing students with different avenues to acquire content regardless of differences in ability. In regard to extended day, P.S. 14 does have an extended day program. Each teacher selects students most in need in ELA and math. The extended day

programs are 2 times a week on Monday and Tuesday. Letters are sent home to parents strongly encouraging the students to attend. Finally, the commenter suggests that schools offer more art and music programs. It is a goal of the New York City schools to provide all public school students a high-quality arts education. The Department of Education supports universal access to arts education through the ArtsCount initiative, which tracks and reports student participation in arts education and holds schools accountable for meeting New York State Instructional Requirements for the Arts.

The Department supports increased quality in arts education through the curriculum and professional development for teachers of visual art, music, dance, and theater. Working with their partners from the cultural community, DOE staff have developed the Blueprint for Teaching and Learning in the Arts, preK-12, which outlines what students should know and be able to do in the arts at key grades and at critical junctures in their intellectual, physical, and emotional development. The Blueprint provides teachers with a path to help them determine the work they should be doing in each art form. It also provides school administrators with tools to supervise arts teachers and recognize and share with parents the potential their children have for achievement in the arts.

Comments 2, 5(a), 6(d), 13, 19, 22 and 28 all relate to the supports that have been given to P.S. 14 and if the supports were specific to the needs of the school community.

To help the school's efforts to improve performance, the DOE offered numerous specific supports including providing extensive leadership training and mentoring for the principal and assistant principals to help them set clear goals for the school while developing the school's Comprehensive Education Plan. The DOE provided coaching and training leadership on strengthening instructional quality through standards-based instruction, differentiated learning techniques, and improving school culture and learning environment through targeted development. Additionally, training was provided for leaders on the implementation of instructional strategies for English Language Learners. The DOE provided professional development opportunities for teachers on the development of best practices for literacy instruction and for English Language Learners. Professional development opportunities were offered for teachers on numeracy and the development of best practices within the Math curriculum. The DOE worked with teacher teams to improve and strengthen Science instruction and support and coached teachers on the use of effective classroom management strategies, Special Education compliance, and instructional support. School staff was advised on budgeting, human resources, teacher recruitment, and building management. In terms of student supports offered, the DOE trained the School Based Support Team in comprehensive guidance programs and evidence-based counseling strategies targeted at developing and improving school culture. The DOE also assisted in developing strategies to reach out and support relationships with various community stakeholders and organizations including Life Space Intervention and Partnership with Children. Extensive professional development opportunities were developed for staff in an effort to improve school environment and school safety. Despite the availability of these supports, it is apparent that P.S. 14 has failed to develop the proper infrastructure to meet the needs of its students and families.

Comment 4(a) and 21(a) question how ELLs and children with IEPs will be affected by the proposed phase-out.

As noted in the EIS, the DOE will continue to provide individualized programming for students with disabilities as the school phases out. Moreover, the new replacement school for P.S. 14 will also provide all mandated services for students with disabilities. Furthermore, Current students at P.S. 14 who receive services for English Language Learners (“ELLs”) will continue to receive those services as the school phases out.

Comment 5 expresses concerns regarding the replacement staff in building R014.

All new district schools opening in campuses where an existing school is phasing out must adhere to Article 18-D of the UFT contract. Article 18-D requires that if a sufficient number of displaced staff from the closing or phasing-out school apply, at least 50% of the new schools’ pedagogical positions shall be selected from among the appropriately licensed most senior applicants from the closing or phasing-out school—in this case, P.S. 14—who meet the new school’s qualifications. Guidance counselor, lab specialist, school secretary, and paraprofessional positions are also subject to Article 18-D.

Comment 5(b) expresses opposition to changing the name of the school because it changes the community’s history and culture.

The DOE has confidence in the abilities of the new school to create a strong culture, if the proposals to phase-out and replace P.S. 14 are approved. The DOE understands the emotions involved in the prospect of phasing out a school and that the school has become a home and community for all of its stakeholders. However, this is not a reason not to make changes to a school when it is failing to serve its students. The name of the school would be changed in order to avoid confusion with the existing P.S. 14, which would be co-located with P.S. 78 in building R014, until the 2015-2016 school year.

Comment 5(c) pertains to the responsibility of the DOE in the low level of performance at P.S. 14.

The DOE annually evaluates the Children First Networks in addition to the schools to determine whether they are adequately supporting their schools. Appropriate action is taken by the DOE when it is determined that a network is underperforming.

Comments 5(a), 6(a), and 14 express concern that the Joint Public Hearing is the first opportunity the community has had to express concerns.

Prior to issuing this proposal, the DOE sought and received feedback from the P.S. 14 community regarding strategies to better support students and improve outcomes at the school. The DOE held meetings with the Parent Teacher Association (“PTA”) and the School Leadership Team (“SLT”) on October 6, 2011 to discuss possible outcomes for P.S. 14 due to its continued poor performance. The DOE also solicited community feedback via telephone and e-mail, and created a dedicated website to provide information to the public:

[http://schools.nyc.gov/community/planning/changes/statenisland/proposal?id=77.](http://schools.nyc.gov/community/planning/changes/statenisland/proposal?id=77)

While members of the P.S. 14 school community objected to the possibility of phasing out the school, the DOE believes that drastic action must be taken given the school's continued failure to improve its performance. The DOE will incorporate community feedback as we continue to support current P.S. 14 students working toward promotion and as we develop plans to replace P.S. 14 with other schools that will better meet student and community needs.

We also welcome community feedback while this proposal is under consideration by the Panel for Educational Policy ("PEP"). Furthermore, the comments received on both proposals are included in this public comment analysis that will be presented to the PEP for the February 9th vote. Finally, the DOE has many avenues through which parents can share feedback and concerns about their children and school, including but not limited to: the Parent Coordinator, the school's PTA, the District Family Advocate, the Community Education Council (elected by the district community), and 311. Families are encouraged to reach out to whichever of these people and offices are appropriate, especially if they have specific concerns they feel have not been answered at the school level.

Comments 6(b), 16, 24 and 29(b) inquired if P.S. 14 will be given the same resources as the proposed replacement school, "P.S. 78," and how the building will be equitably shared.

The DOE remains focused on helping P.S. 14 students to succeed. If this proposal is approved, P.S. 14 would be provided targeted, customized, and intensive supports aimed at the unique needs of the school and its students. This support would be in the areas of budget, staffing, programming, community engagement, guidance, and enrollment. If these proposals are approved, P.S. 14 and P.S. 78 will both be allocated funding based on Fair Student Funding.

Furthermore, if this proposal to phase out P.S. 14 and the proposal to open P.S. 78 are approved, pursuant to the Citywide Instructional Footprint (the "Footprint"), there will be sufficient space to accommodate both P.S. 14 and P.S. 78's elementary school grades in R014 throughout the period while P.S. 14 phases out and while P.S. 78 gradually phases in until 2015-2016. In a "co-location," schools may share common spaces like auditoriums, gymnasiums, and cafeterias.

Comments 2(a), 8, 16(a), 16(b), 29 and 29(a) relate to the effects of the gradual phase out on the remaining students at P.S. 14 and if a support system will be put in place for those students.

The DOE remains focused on helping P.S. 14 students to succeed. If this proposal is approved, P.S. 14 would be provided with targeted, customized, and intensive supports aimed at the unique needs of the school and its students. This support would be in the areas of budget, staffing, programming, community engagement, guidance, and enrollment including, but not limited to:

- Helping the school provide students with options that support their advancement, and fully prepare students for their next transition point;

- Working with school staff to foster a positive culture; and
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

Comment 16(b) suggests that bringing in new teachers will be traumatic for current students at P.S. 14.

The DOE has proposed to gradually phase out the school and supports will continue to be offered to the P.S. 14 in order to raise expectations and increase student performance. As noted in the response above, the DOE will continue to provide supports for P.S. 14. Students are assigned to new teachers on a yearly basis, and as such, students would change teachers between the 2012-2013 and 2013-2014 school years whether or not this proposal is approved.

Comments 3, 4, 6, 7, and 12 are all regarding the funding and resources provided to P.S. 14.

The DOE provides all schools, including P.S. 14, funding on a per-pupil basis. As discussed above and in the EIS, in an effort to turn P.S. 14 around, the DOE has provided the school with numerous additional supports in the areas of school leadership, instruction, and operations. Given the extent of these investments and the negligible improvements that resulted, the DOE does not believe that extra funding or resources are the appropriate approach to dramatically improving the school.

Comments 9, 10 and 27 express support for the staff at P.S. 14 and remark that the school has made recent progress.

With respect to these comments, the DOE recognizes that P.S. 14 has a committed staff that has worked hard to support its students. However, despite these attempts to help meet the needs of its students, along with the assistance provided by the DOE, P.S. 14 has not developed the culture and conditions to effectively support its students' instructional needs and therefore the DOE believes that phasing out the school is appropriate.

Comment 3(a) advocates for greater parent involvement.

The DOE supports parent involvement in all aspects of their students' education. When families are involved in education, schools and students benefit. The DOE agrees with the speaker that all parents should get involved in their own child's education. There are also many school, district, and citywide leadership opportunities for parents who want to take on a greater role in the schools.

Comment 11 described increases to class sizes and reduced staff at P.S. 14.

The number of class sections at each school is determined by how the principals program their schools. This decision is based on enrollment, budget, and student needs. The DOE makes efforts to ensure that class sizes remain within the United Federation of Teachers contractual class sizes, which vary by grade level. Since funding in school budgets is

allocated on a per-pupil basis. FSF covers basic instructional expenses and FSF funds may, at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs. P.S. 14 also receives additional Title 1 funding.

Comment 15 suggests that the DOE used school funds to hire private consultants.

As noted in an earlier response, funding for P.S. 14 is allocated on a per-pupil basis, known as Fair Student Funding (FSF), which covers basic instructional expenses and, at the school's discretion, can be used to hire staff, purchase supplies and materials, or implement instructional programs including those from outside consultants.

Comment 17 expresses concern about where meals will be offered if P.S. 14 closes.

The R014 building will remain open and will continue to serve meals. As described in the EIS, if these proposals are approved by the PEP on February 9, 2012, the school organization of P.S. 14 would be phased-out and replaced by P.S. 78 beginning in September 2012. The new school would serve the exact same zone as P.S. 14 has and would do so in the R014 building. All current second, third, and fourth grade students will remain in P.S. 14 in the R014 building as the school phases out. All current kindergarten and first grade students, as well as all future students, would attend P.S. 78 in the R014 building as it phases in. Thus, all students currently guaranteed a seat to the R014 building would continue to have the same seat guarantee. To that end, school meals will still be provided in the same way they are currently.

Comment 18 stated that this should not be considered a closure, but a way to "fix" the school. She distributed a document regarding the school administration.

To clarify the phase-out process, if this phase-out proposal is approved, P.S. 14 would no longer admit kindergarten students and would no longer offer grades one and two or its pre-kindergarten program after the conclusion of the 2011-2012 school year. Beginning in the 2012-2013 school year, after P.S. 14's kindergarten, first grade, and second grade are phased out, P.S. 14 would serve one less grade in each subsequent year until it completes its phase-out and closes in June 2015. Current students in grades two, three, and four would continue to be served by P.S. 14 and would be supported as they progress toward completion of elementary school at P.S. 14. Current students in fifth grade will be supported as they transition to middle school. Furthermore, the DOE is investigating the allegations made in the document that was submitted.

Comment 21 noted a typographical error in the Proposed Co-location of New School 31R078 (31R078) with P.S. 14 Cornelius Vanderbilt (31R014) on page 4 of the EIS.

An amendment to the EIS to correct the typographical error was posted on January 27, 2012 and can be viewed on the DOE website <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Feb2012Proposals>.

Comment 21(b) encourages all community stakeholders to attend the PEP meeting.

The DOE has notified the community in both English and Spanish notices that the Panel for Education Policy will consider and vote on these proposals on **February 9, 2012** at 6:00 PM at the Brooklyn Technical High School, 29 Fort Greene Pl, Brooklyn, NY 11217.

Comments 20 and 23 suggest that the proposal is a “done deal” because the DOE already assigned a new school number to the proposed new school.

These proposals will only be implemented if approved by the PEP on February 9, 2012. The development of a new school number was an effort to assure the community that the DOE is responsibly proposing and planning for a replacement school, and to share this with the community so that the overall plan to better serve the P.S. 14 community could be understood as a whole.

Comments 25 and 26 do not directly relate to the proposal and do not require a response.

Comment 29(c) questions whether the P.S. 14 community was informed of their rights under the NCLB act.

In school year 2010-2011, P.S. 14 was not identified as a school that qualified for NCLB transfers due to the fact that it was not a SINI school for two consecutive years.

With regard to Comment 30, 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.