



Public Comment Analysis

Date: December 10, 2013
Topic: The Proposed Co-location of a New District High School (16K765) with Existing Schools Boys and Girls High School (16K455) and Research and Service High School (16K669) in Building K455 Beginning in 2014-2015
Date of Panel Vote: December 11, 2013

Summary of Proposal

On October 25, 2013, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to co-locate a new district high school (“16K765”) in the Boys and Girls High School Campus, Building K455 (“K455”), located at 1700 Fulton Street, Brooklyn, NY 11213 in the geographical confines of Community School District 16. 16K765 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. 16K765 will admit students through the Citywide High School Admissions process using a limited unscreened admissions method. If this proposal is approved, 16K765 will be co-located in K455 with existing schools Boys and Girls High School (16K455, “Boys and Girls”), which admits students through the Citywide High School Admissions Process through zoned and screened admissions methods, and Research and Service High School (16K669, “Research and Service High School”), a transfer school that opened in September 2013 and that will complete its phase-in by the 2015-2016 school year. Research and Service High School accepts students 16 years of age and older who have attended another New York City public high school for at least one year and are behind in high school or at risk of dropping out. 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. The Panel for Educational Policy (“PEP”) will vote on this proposal on December 11, 2013.

Copies of the EIS are available in the main offices of Boys and Girls and Research and Service High School, as well as at the following link: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/December2013SchoolProposals>.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding the proposal was held at the Boys and Girls High School Campus on November 26, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 21 members of the public attended the hearing, and 7 people spoke. Present at the meeting were Brooklyn High Schools Superintendent Karen Watts, who acted as Chancellor’s Designee; Senior Superintendent Elaine Gorman; District 16 Community Education Council (“CEC 16”) President Felicia Alexander; Boys and Girls School Leadership Team (“SLT”) representatives Principal Bernard Gassaway and Dominique Borgella; and Research and Service High School SLT representative Principal Allison Farrington. Carrie Marlin and Vicki Javier from Department of Education Division of Portfolio Planning were also present.

The following comments and remarks were made at the joint public hearing on November 26, 2013 on the proposal:

1. Felicia Alexander, president of CEC 16, commented as follows:

- a. The CEC supports the idea of a new high school in the district, but opposes co-locations.
 - b. The building is underutilized, but the available space could be used to increase enrollment at Boys and Girls.
 - c. Additional resources should be used to bolster programming at Boys and Girls to increase enrollment and increase the school's graduation rate.
2. A Boys and Girls SLT member commented that:
 - a. The school has great teachers and administrative staff.
 - b. The admissions method for Boys and Girls was changed by the DOE so that students who have scored Level 3 and 4 on state exams are not admitted to the school.
 - c. The performance of the proposed new school may not necessarily be better than Boys and Girls' performance because both schools will serve similar students.
 - d. The proposal should be put on hold until a new mayor comes into office.
 - e. The staff would like to see another "Academy" led by Principal Gassaway. There would be no need for a new principal.
3. A Boys and Girls SLT member commented that:
 - a. Boys and Girls accepts students regardless of academic proficiency, including those who were already struggling academically in middle school.
 - b. Teachers lack the appropriate tools to effectively teach their students.
 - c. The three principals would have difficulty scheduling shared spaces and determining school location by floor-level.
 - d. Co-located schools are struggling.
 - e. The new school may have an admissions method which selectively admits students who have scored Level 3 and 4.
 - f. The percent of Boys and Girls students earning a regents diploma is actually 40%, not 34% as reported in the EIS. In addition, the school's graduation rate has been on an upward trend.
 - g. The school would benefit from having racial diversity.
4. A student commented that:
 - a. This type of DOE intervention is not seen in schools with predominantly Caucasian students.
 - b. Adding another school to the building would add confusion about which facilities, such as bathrooms, students should use.
 - c. The identity of the community is eroding.
5. The UFT District Leader commented as follows:
 - a. Boys and Girls is the pride of Bedford-Stuy.
 - b. She wonders what the rationale is for another co-located school.
 - c. A building's underutilization often triggers the DOE to co-locate district and charter schools.
 - d. The new school could potentially be sited in the basement.
 - e. The enrollment projections presented in the EIS are projected too far into the future. Principals struggle trying to predict year-to-year enrollment alone.
 - f. The PEP vote will be held in the Bronx, which is too far from the Boys and Girls community.
6. A Boys and Girls SLT member commented that:
 - a. She opposes the proposal.
 - b. Contrary to what the EIS states, there will be an impact in the existing schools as there will be a new principal and school in the building.
 - c. The co-location of Research and Service High School was challenging, but the two schools have forged a great relationship as Research and Service High School was an organic extension of Boys and Girls.
 - d. The available space should be used to increase enrollment at Boys and Girls.
 - e. There are great initiatives taking place in Boys and Girls, such as a new health center, new wellness department, and new hydroponics lab. Boys and Girls' performance will begin trending on the positive side with these new amenities.
 - f. The proposal seems rushed in light of the fact that Mayor Bloomberg is leaving.
7. A Boys and Girls SLT member commented that:
 - a. Mayor Bloomberg is responsible for steering high-performing students away from Boys and Girls.
 - b. Boys and Girls is a home to many students. Teachers are like parents.
 - c. The proposal is perceived as an attack on the school's large non-white population.
 - d. Boys and Girls is using the excess space for additional programming.

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

No written or oral comments were received regarding this proposal.

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

Comments 2(a) and 7(b) express support for the nurturing environment created by the Boys and Girls staff.

The DOE acknowledges that there is strong support for the Boys and Girls community and commends the hard work of school staff. This proposal is not anticipated to impact Boys and Girls' ability to continue to cultivate a strong community.

Comments 3(c), 4(b), 5(d) relate to each respective school's location within the building and the allocation of shared space.

There are currently hundreds of schools in buildings across the city that are co-located; some of these co-locations are multiple DOE schools while others are DOE and public charter schools sharing space.

The assignment of specific rooms and location for each school in the building, as well as the usage of shared spaces and bathroom facilities, will be made by the Office of Space Planning in consultation with the Building Council, which is comprised of the principals of each co-located school. It is up to school leaders to decide how best to program the space allocated to each school. If the Building Council is unable to resolve an issue, it should engage in the dispute resolution process outlined in the Campus Policy Memo, which is available at <http://schools.nyc.gov/community/campusgov>.

Comment 6(c) expresses support for the positive relationship between Boys and Girls and Research and Service High School.

The DOE applauds the positive working relationship between the two schools. The DOE does not anticipate that this proposal will have an adverse impact on the relationship between the two existing schools, and expects that the current leaders and 16K765's new school leader will work together to ensure the smooth operation of the K455 campus for all schools.

Comments 4(a), 5(b, c), and 7(c) concern the rationale for co-locating a new high school in K455.

Co-located schools exist in all communities across New York City; indeed, roughly half of schools Citywide share space in a building. This proposal is driven by the DOE's desire to more efficiently utilize its building capacity to serve students, and to provide high quality educational options for all families.

Proposals about where new schools are sited are made by the DOE's Division of Portfolio Planning ("Portfolio") in conjunction with the Office of Space Planning. The DOE proposes co-locations to ensure that resources are being used in the most efficient manner possible so that students and families in every community have access to high-performing educational options. As discussed in the Revised Under-utilized Space Memorandum (as of November 20, 2012), on a yearly basis, the DOE conducts a transparent process to publish a list of under-utilized buildings by applying consistent criteria to all school buildings across the city. Buildings like K455 that have, or are projected to have, 300 or more seats available in the next several years according to the Blue Book may be eligible for a co-location, among other potential changes in school utilization. A copy of the Revised Under-utilized Space Memorandum describing in detail the process for identifying under-utilized schools is available at: http://schools.nyc.gov/NR/ronlyres/6D8EA76A-82FA-4740-9ED1-66BCABEE8BFB/134525/UnderutilizedSpaceMemorandum112012_vFINALforprint.pdf.

According to the 2012-2013 Enrollment Capacity Utilization Report (the "Blue Book"), building K455 has a target capacity of 3,232 students. As described in the EIS, in 2013-2014, Boys and Girls is projected to serve approximately 886 students in ninth through twelfth grades and Research and Service High School is projected to

serve approximately 150 students. This yields a projected utilization rate of approximately 32%. This means that the building is “underutilized” and has space to accommodate additional students. In 2017-2018, when 16K765 reaches full-scale, all three schools will serve a combined total of 1,515-1,635 students, yielding an estimated building utilization rate of 47%-51%. Thus, K455 has sufficient space to accommodate the proposed co-location.

Comments 1(c) and 3(b) concern the availability of resources for Boys and Girls.

Most funding in schools’ budgets is allocated on a per pupil basis, based on the Fair Student Funding (“FSF”) formula. Schools receive additional funds for students with disabilities, English Language Learner students (“ELLs”), and those with other supplemental academic needs. If a school’s population declines, the school’s budget decreases proportionally, just as a school with an increase in students receives more money. Even if the DOE had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls. Please refer to the FSF Guide¹ and FY14 School Allocation Memoranda² for additional information on cost of instruction and how the changes to FSF funding and other school allocations will be impacted as a result of register changes.

This proposal is not anticipated to impact the FSF allocated to either Boys and Girls or Research and Service High School.

Comments 1(b, c), 2(e), 6(d), 7(d) suggest that the available space in K455 should be utilized to increase enrollment and/or programming at Boys and Girls.

The DOE closely monitors the need to create additional elementary, middle, and high school seats across the city. Demand for District 16 high schools is lower than the average for high schools in Brooklyn and across the city. For the 2013-2014 school year, programs in District 16 high schools only received an average of 5.5 applications for each seat offered, as opposed to an average of 5.7 applications per seat across Brooklyn high schools, generally, and an average of 8.1 applications per high school seat Citywide. This is one indicator that District 16 needs additional high quality high school options, not just additional seats at existing schools.

There will be a substantial number of full-size instructional rooms in excess of all schools’ baseline allocations of instructional space even after 16K765 has completed its phase-in. Therefore, the proposal does not preclude the expansion of any of the existing schools, including increasing the enrollment or future programmatic offerings at Boys and Girls, should demand warrant it. However, from 2008-2009 to 2012-2013, enrollment at Boys and Girls has decreased significantly, by approximately 62%. Additionally, students had opportunity for the 2013-2014 school year to apply to a new screened admissions program at Boys and Girls, the Smart Scholars Early College Program.

Comments 1(a) and 6(a) express opposition to co-locations, generally, and this proposal, in particular.

The DOE acknowledges there is opposition to this proposal from some members of the community. However, this proposal is driven by the DOE’s desire to more efficiently utilize its building capacity to serve students, and to provide high quality educational options for families.

Comment 6(e) concerns various new initiatives underway at Boys and Girls.

The DOE supports these new developments and does not anticipate that this proposal will adversely impact them. As discussed above, there will continue to be significant excess space in the building once 16K765 has fully phased-in. Please also refer to the response to comments 1(b, c), 2(e), 6(d), and 7(d).

Comment 4(c) contends that the proposal will erode the identity of the community.

The DOE does not anticipate any substantive changes in each school’s ability to foster a strong sense of community. As noted earlier in response to comments 2(a) and 7(b), The DOE expects that the new school and the other high

¹ http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy13_14/FY14_PDF/sam01_1c.pdf

² http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy13_14/FY14_PDF/sam21.pdf

schools and organizations in this building will work collaboratively to build a strong working relationship through the Building Council.

Comment 5(e) concerns the accuracy of the Boys and Girls enrollment projections contained in the EIS.

Projections for the 2014-2015 school year and beyond are based on the current enrollment of the entry point grade for each school, assume that the same number of students will age up and that there is either a stable incoming enrollment at the entry point, or an enrollment consistent with historical patterns.

The enrollment projections in the EIS are based on 2013-2014 budget register projections for Boys and Girls' ninth grade, and assume that the same number of students will articulate up and that there will be stable incoming enrollment for ninth grade.

While the unaudited register for total enrollment at Boys and Girls as of October 31, 2013, is above the enrollment projections listed in the EIS by approximately 65 students, it is anticipated that enrollment at Boys and Girls will stabilize and align with projections. Additionally, according to the unaudited register, ninth grade enrollment is actually lower than the ninth grade budget register projections for 2013-2014. 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 students who have been absent continuously for 30 days or more as of October 31st. The DOE's enrollment projections are based on the prior year's audited register numbers which exclude LTAs, consistent with the manner in which the DOE conducts planning and calculates space allocations and funding for all schools.

Comments 2(d) 6(f) concerns the DOE's issuance of proposals for implementation in the 2014-2015 school year.

All proposals for the December 11th PEP vote represent a continuation of DOE's strategy to increase access to high quality schools in communities that need better options for the 2014-2015 school year and beyond. Consistent with this, the PEP has already approved over 50 proposals for September 2014 implementation during the May, June, October, and November 2013 PEP meetings.

The development of these proposals reflects our extensive strategic planning to advance our proven strategy of bringing high quality district and charter schools online, as well as our 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
- Office of Space Planning to plan school placement and implement any needed facilities upgrades; and
- Charters to submit proposals for facilities matching; and
- Division of Facilities to review and conduct work on approved proposals.

Comment 6(b) suggests that the proposal will have an adverse impact on Boys and Girls.

While the co-location will reduce the amount of excess space which is currently available to Boys and Girls and Research and Service High School, the co-location is not expected to impact instructional programming, extra-curricular offerings, or partnerships at either school.

The Citywide Instructional Footprint (the "Footprint") is the guide used to allocate space to all schools based on the number of class sections they program and the grade levels of the school. The number of class sections at each school is determined by the principal based on enrollment, budget, and student needs; there is a standard guideline of target class size (i.e., number of students in a class section) for each grade level. At the middle school and high school levels, the Footprint assumes every classroom is programmed during every period of the school day except one lunch period. The full text of the Instructional Footprint is available at

http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

As demonstrated in the EIS, once 16K765 has completed its phase-in, 64 full size instructional rooms will remain in excess of the schools' collective baseline (or adjusted baseline) instructional room allocations pursuant to the

Footprint. To the extent the commenter expresses concern about the addition of a school leader to the school, please refer to the response to [comments 3\(c\), 4\(b\), 5\(d\)](#) for information about the dispute resolution process for Building Councils.

[Comments 2\(b, c\), and 3\(a, e\)](#) concern the admissions policies of Boys and Girls as compared to 16K765.

Boys and Girls admits students through the Citywide High School Admissions Process and offers a zoned program to students who reside in the K455 zone and two screened academic programs: The Smart Scholars Early College Program, and the Institute for Computer and Technology Program. Admission to the Smart Scholars Early College program is based on a variety of factors, including a review of attendance, punctuality, grades, test scores, and an interview. Admission to the Institute for Computer and Technology is based on standardized test scores, grades, and a review of attendance and punctuality.

Contrary to some commenters' concerns (and unlike Boys and Girls' two screened programs), 16K765 will not use academic criteria in its admissions. 16K765 will be a limited unscreened school. Limited unscreened schools give admissions priority to students who demonstrate interest in the school by attending an information session, open house event, or visiting the school's exhibit at any one of the High School Fairs.

[Comment 7\(a\)](#) contends that Mayor Bloomberg is steering high performing students away from Boys and Girls.

This statement is not true. Boys and Girls offers a zoned program and two academically screened programs. The zoned program guarantees a seat for students residing in the K455 zone, regardless of grades from prior school years. A student's zoned school is determined by his or her home address.

One screened program, the Institute for Computer and Technology, provides students with computer literacy, maintenance skills, knowledge of programming languages and the cognitive skills to solve problems through programming. The selection criteria for this program include grades from the prior school year, as well as reading and math standardized test scores and a review of attendance and punctuality.

The second screened program, the Smart Scholars Early College Program, was added for this school year and, as described in the EIS, has a curriculum designed to prepare students for college level courses and where scholars will fulfill the New York State high school requirements while obtaining 20 transferable college credits. The selection criteria for this program also include a review of grades, standardized testing scores and attendance and punctuality records, in addition to an interview and writing sample. As noted earlier, this academic screened program was added this school year in an effort to increase the programming options available at Boys and Girls.

[Comment 3\(d\)](#) contends that co-located schools are struggling.

This proposal is not expected to impact the ability of Boys and Girls and Research and Service High School to serve all students academically. Moreover, regardless of co-located status, all schools receive support and assistance from their superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. Struggling schools receive supports as part of system-wide efforts to strengthen all schools; and they also receive individualized supports to address their particular challenges. We do everything we can to offer struggling schools leadership, operational, instructional, and student supports that can help turn a struggling school around.

Additionally, many co-located schools are excelling academically and serving students well: a recently published report by MDRC found that the DOE's new, small schools, many of which are in co-located buildings, and which, according to the study, "serve mostly disadvantaged students of color, continue to produce sustained positive effects, raising graduation rates by 9.5 percentage points. This increase translates to nearly 10 more graduates for every 100 entering ninth-grade student."

[Comment 3\(f\)](#) contends that Boys and Girls has been improving academically.

The DOE commends the fact that the graduation rate for Boys and Girls has increased from 39% in 2011-2012 to 44% in 2012-2013. It should be noted, though, that the proposal to open a new school at K455 is intended to provide an additional high school option for students and families and is not based on performance at Boys and Girls.

Furthermore, it should be noted that the EIS correctly reports that 34% of students in Boys and Girls graduated with a Regents Diploma in 2009-2010.

Comment 5(f) concerns the location of the December 11, 2013 PEP vote.

The PEP votes on proposals impacting schools across the city and its meeting location varies from month to month. Throughout the school year, PEP meetings rotate amongst locations throughout all five boroughs. For example, the August meeting was held in Manhattan, the September meeting was held in Queens, and both October meetings were held in Brooklyn. Locations are chosen based on the school buildings' ability to accommodate large public meetings and convenience to public transportation as well as accessibility. Travel directions to the meetings can be found here:

<http://schools.nyc.gov/AboutUs/leadership/PEP/meetings/Directions/default.htm>.

In addition, comments regarding proposals may be submitted via the dedicated e-mail address or voicemail number.

Comments 3(g), 5(a) do not directly relate to the proposal and do not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.