

Public Comment Analysis

Date: December 15, 2015

Topic: The Proposed Consolidation of Urban Assembly Academy of Civic Engagement (08X366) with Mott Hall Community School (08X467) in Building X192 Beginning in the 2016-2017 School Year

Date of Panel Vote: December 16, 2015

Summary of Proposal

On October 30, 2015, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) proposing to consolidate Urban Assembly Academy of Civic Engagement (08X366, “Civic Engagement”), an existing middle school that currently serves students in sixth through eighth grade, with Mott Hall Community School (08X467, “Mott Hall”), an existing middle school that serves students in sixth through eighth grade, beginning in the 2016-2017 school year. A “consolidation” means that two or more existing school organizations are combined into one school to operate and serve students more effectively.

On November 18, 2015, the DOE posted an amended EIS to add information about the DOE’s methodology for calculating enrollment projections and to explain the capacity for future growth of Mott Hall and Urban Institute of Mathematics (08X371, “Urban Institute”) in the X192 building, if the consolidation is approved. In addition, the Amended EIS was updated to reflect new enrollment data from the 2015-2016 Unaudited Register, which became available on October 31, 2015 and was then the most current data available. Due to this change in enrollment data sources, Civic Engagement’s space allocation for the current school year was also updated.

The DOE is proposing to consolidate Civic Engagement with Mott Hall because both schools have struggled with low enrollment, which creates budgetary and programmatic challenges. Civic Engagement, in particular, has seen a significant drop in enrollment over the past several school years. If this proposal is approved, Civic Engagement and Mott Hall will be combined such that students, staff, and resources of Civic Engagement will become part of Mott Hall, and Civic Engagement will no longer exist as a distinct school option as of the 2016-2017 school year.

Mott Hall and Civic Engagement are co-located in building X192 (“X192”), located at 650 Hollywood Avenue, Bronx, NY 10465 in Community School District 8 (“District 8”), along with Urban Institute, an existing middle school that serves students in sixth through eighth grade, and Bronx Delta School (08X392, “Delta”), an existing elementary school that is phasing in and currently serves students in kindergarten and first grade and offers a pre-kindergarten program. A co-location means that two or more school organizations are located in the same building and may share common spaces, such as

auditoriums, gymnasiums, and cafeterias. Building X192 also houses the following three community-based organizations: Phipps Beacon Community Program (“Beacon”), East Side House Settlement (“East Side House”), and Xposure After-School Institute (“Xposure”). If this proposal is approved, Urban Institute will continue to serve students in sixth through eighth grade, and Delta will continue to phase in until it reaches full scale in the 2019-2020 school year, when it will serve students in kindergarten through fifth grade and offer a pre-kindergarten program. If this proposal is approved, the DOE anticipates that Beacon, East Side House, and Xposure will continue to provide services and maintain their space in X192.

The New York State Education Department (“SED”) assigns an accountability status to each district school—Good Standing, Local Assistance Plan, Focus, or Priority. Both Mott Hall and Civic Engagement are identified as Focus schools. If this proposal is approved, the newly consolidated school would retain Mott Hall’s status as a Focus school.

Civic Engagement is one of a cohort of 94 schools that have been designated by the DOE as Renewal Schools. Schools selected to be Renewal Schools were assigned the state accountability status of Priority or Focus Schools by SED, demonstrated low academic achievement (in 2012, 2013, and 2014), and scored “Proficient” or below on their most recent Quality Review at the time of selection. (Four schools were selected to be Renewal Schools per the Chancellor’s discretion). Mott Hall is not a Renewal School.

As a Renewal School, Civic Engagement is currently being transformed into a Community School. Community Schools are intended to be neighborhood hubs where students receive high-quality academic instruction, families can access social services, and communities congregate to share resources and address their common challenges. If this proposal is approved, the newly consolidated Mott Hall would not be designated as a Renewal School, but it would be designated as a Community School.

Urban Institute is also a Community School; its status as a Community School will not be impacted by this proposal. Urban Institute is not a Renewal School.

Building X192 has the capacity to serve a total of 1,390 students. If this proposal is approved, Mott Hall will absorb the enrollment of Civic Engagement and will serve a projected 335-365 students in sixth through eighth grade in the 2016-2017 school year. Urban Institute will serve a projected 275-305 students in sixth through eighth grade in the 2016-2017 school year. Delta will serve a projected 226-256 students in kindergarten through second grade and pre-kindergarten in the 2016-2017 school year. This will result in a total projected building enrollment of 836-926 students in X192, yielding a building utilization rate of 60%-67% in the 2016-2017 school year. When the proposal is at full-scale in the 2020-2021 school year, building X192 is projected to serve 1,101-1,221 students and have a projected utilization rate of 79%-88%.

The amended EIS can be found on the DOE’s website at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/December2015SchoolProposals>.

Copies of the EIS are also available in the main offices of Civic Engagement, Mott Hall, Urban Institute, and Delta.

Summary of Comments Received at the Joint Public Hearing

A Joint Public Hearing regarding this proposal was held at building X192 on December 7, 2015. At that hearing, interested parties had the opportunity to provide input on the proposal. Approximately 48 members of the public attended the hearing; no members of the public spoke, but several members of the Community Education Council (“CEC”) 8 and impacted School Leadership Teams (“SLT”) made statements. Present at the hearing were: Dorita Gibson, Senior Deputy Chancellor of the DOE; Karen Ames, District 8 Community Superintendent; Eduardo Hernandez, Amy-Ann Vohnout, and Aurora Ronda, members of CEC 8; Benjamin Basile, Master Principal of Mott Hall and Civic Engagement; Bigelcio Coleman and Lisa Mateo, members of the Mott Hall SLT; Kelly Von Hoene, Principal of Civic Engagement; Jeanette Simedey, a member of the Civic Engagement SLT; Jennifer Joynt, Principal of Urban Institute; Urban Institute SLT Members Michal Loeb, Joann Filomio, Susan Porter, and Joseph Martin; Maria Rogalle, Principal of Delta; and Stephanie Kohnken, a member of the Delta SLT. Carolyn Cox McDonald, the Administrative Assistant for CEC 8 was present. David Harrington, Bridget Mercier, Anderson Reyes, and Jose Vasquez from the DOE were also present.

The following questions, comments and remarks were made at the Joint Public Hearing

1. CEC 8 member Eduardo Hernandez expressed that he has no negative comments about the consolidation but that he does have concerns about the proposal, stating:
 - a. He has concerns about the scheduling of the December Panel for Educational Policy (“PEP”) meeting that he would like Deputy Chancellor Dorita Gibson to relay to the PEP, since the December PEP is the same night as a CEC 8 meeting.
 - b. The PEP has a more flexible schedule than the CEC and should consider the CEC’s schedule, since the CEC’s full schedule is provided at the beginning of the school year.
 - c. The December PEP meeting is in Manhattan, and people from the Bronx may not be able to go to Manhattan for the PEP because it takes a long time to get to Manhattan from the Bronx.
 - d. Even though the PEP is far from the Bronx, and even though this is not a contentious proposal, members of the public should go to the PEP and voice their concerns so that the PEP can consider the community’s feedback.

2. CEC 8 member Amy-Ann Vohnout expressed her support for Urban Institute and her concerns about the school’s future, stating:
 - a. When X192 housed just one school, she did not think the school was good and she used to worry that she would have to send her children to private school when they reached middle school age. In her opinion, Urban Institute, however, has been doing good work in recent years.
 - b. She was confused by the enrollment projections in the EIS and concerned about having more than 1,000 students in three schools in the building.
 - c. She is concerned that Urban Institute is projected to be smaller than Delta and Mott Hall but also was also concerned that Urban Institute could grow too large if the consolidated Mott Hall is perceived as a less attractive middle school choice in the future.
 - d. She is concerned about the schools sharing the same space, bell schedules, lunch times, and programming.

- e. Ms. Vohnout asked if this proposal will be taken into account when the DOE creates the budget for Urban Institute and the budget for Mott Hall.
3. CEC 8 member Aurora Ronda stated her support for the proposal but also shared the following:
 - a. Ms. Ronda expressed concerns about the schools sharing lunch schedules.
 - b. Ms. Ronda expressed concerns about how the schools would accommodate more students.
4. Lisa McKay from the Mott Hall SLT stated her support for the proposal:
 - a. Ms. McKay stated that things are going well at Mott Hall and expressed support for the work Principal Basile has been doing.
 - b. Ms. McKay expressed her opinion that the consolidation will be better for the X192 community because she has seen an improvement in Civic Engagement students since the school began preparing for the consolidation with Mott Hall.
 - c. Ms. McKay expressed her belief that any concerns raised about enrollment will be addressed in the future.
5. Michael Loeb from the Urban Institute SLT stated that he would not speak against the consolidation but that he had concerns about the DOE's process for making significant changes to school utilization:
 - a. Mr. Loeb stated that decisions to open, close, and consolidate schools seem predetermined.
 - b. Mr. Loeb expressed concern that the decisions are being made in central DOE offices, located 13 miles from the Bronx, where the schools are located.
 - c. Mr. Loeb expressed concerns about the public being able to make it to a PEP on a weekday night.
 - d. Mr. Loeb expressed concerns about the EIS showing a decline of 74% in Civic Engagement's enrollment when the school was told that it was not allowed to enroll a sixth grade this year.
 - e. Mr. Loeb stated that he is worried that a predetermined decision will affect Urban Institute in the future.
 - f. Mr. Loeb said that he has heard that the Chancellor wants to consolidate schools with enrollment under 300, that the EIS projects Urban Institute's enrollment to be under 300, and the plan to enroll 396 students in Urban Institute is not in writing.
 - g. Mr. Loeb expressed concern that Mott Hall's enrollment has never been 375 students, although it is projected to have 375 students in the EIS.
 - h. Mr. Loeb indicated that that he wants to know if any future changes are planned for Urban Institute and that he does not want to be surprised.
 - i. Mr. Loeb stated that, although Urban Institute has things to work on, students are attending Urban Institute and it is a good choice that he hopes will remain going forward.
 - j. Mr. Loeb concluded by stating that if there is a decision to consolidate Urban Institute and Mott Hall, he hopes that those who are concerned about that decision will not have to go to Manhattan to speak about it.
6. Stephanie Kohnken, a member of the Delta SLT, expressed her support for the proposal, noting the collaboration she has witnessed among the four principals in such a short time and expressing her full confidence in a smooth transition in the merging of the two schools.

7. Susan Porter, a member of the Urban Institute SLT, expressed concerns about the enrollment numbers in the EIS, stating that enrollment for Urban Institute is projected to be 100 students fewer than Mott Hall, which makes her concerned about the future of Urban Institute

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

The DOE did not receive any comments through the dedicated email address or the dedicated phone line for this proposal.

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

Comments 1(a-d), 5(c, j) express concerns about the December PEP date, location, and agenda.

The PEP is scheduled to vote on this proposal, along with another proposal, at its December 16, 2015, meeting at High School of Fashion Industries, 225 West 24th Street, New York, NY 10011.

The PEP is mandated to meet at least once per month and to hold at least one meeting in each borough to accommodate families across the city. The PEP meeting dates and locations are set for the year in advance and are made available on the DOE's website at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/schedule/2015-2016/20152016PanelforEducationalPolicyCalendar.htm>. The PEP published its full calendar for the 2015-2016 school year on August 26, 2015.

Thus, although the December PEP meeting is being held in Manhattan, next month's PEP meeting (January 20, 2016), will be held in the Bronx.

In specific response to comment 5(j), the DOE notes that the Joint Public Hearings, like this one held at building X192, serve as a way to collect public feedback at a convenient location within the impacted borough. This feedback is aggregated and addressed in an analysis of public comment (like this one), which is presented to the PEP the night before its vote, to inform the PEP members in their decision-making in advance of voting. Additionally, the DOE collects public input through a dedicated phone line and email address so members of the public can provide comment without leaving home.

Although there are several ways that interested parties can provide input without attending the monthly PEP meeting, the DOE supports commenter 1(d)'s encouragement of broad attendance at the December PEP meeting in Manhattan.

Comments 2(a) and 4(a) praise Urban Institute and Mott Hall for their good work. The DOE recognizes the praise for the schools in the X192 building and commends the school communities for their hard work and dedication. The DOE is committed to supporting each school in X192 throughout the consolidation process, if this proposal is approved.

Comments 2(b-c), 4(c), 5(d, f, g), and 7 are related to concerns about enrollment figures provided in the EIS for the schools in the X192 building.

The enrollment projections provided in the EIS are based on the DOE's standard methodology for calculating enrollment projections for EIS's. The enrollment numbers provided in this EIS are only projections and are subject to change as a result of many factors, including changes in demand for the schools and any modifications to admissions practices in future years. All projections referenced for Civic Engagement, Mott Hall, Urban Institute, and Delta for the 2015-2016 school year and for the consolidated Mott Hall in 2016-2017 and beyond are based on 2015-2016 Unaudited Register and reflect the forward promotion of the cohorts by grade. As noted below and in the EIS, Urban Institute and the consolidated Mott Hall are each able to accommodate up to approximately 396 students within their space allocations pursuant to the Citywide Instructional Footprint.

With specific reference to comment 2(b), which concerns X192 being projected to have more than 1,000 students enrolled in the three schools in the building, X192 has the capacity to serve a total of 1,390 students per the 2014-2015 Enrollment Capacity Utilization Report (the "Blue Book"), which is available online at: <http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Enrollment/2014-2015BlueBook.pdf>. The DOE projects that by the 2020-2021 school year, when this proposal is at full-scale, X192 will have a total building enrollment of 1,101 -1,221 students, yielding a building utilization rate of 79%-88%. Therefore, the DOE believes that X192 has sufficient capacity to accommodate the enrollments projected in this proposal.

With specific reference to comment 5(d), Civic Engagement's enrollment has declined 74% from 376 students in the 2009-2010 school year to 99 students in the 2015-2016 school year. Civic Engagement did enroll sixth grade class of 5 students for the 2015-2016 school year, according to the Unaudited Register as of October 31, 2015. This low enrollment reflected the low demand for Civic Engagement among incoming sixth grade students.

With specific reference to comment 5(g), the DOE projects that, if this proposal is approved, the consolidated Mott Hall will have enrollment of 335-365 in the 2016-2017 school year, which is based upon the DOE's standard methodology for budget projections and is larger than Mott Hall's current enrollment of 251 students because it is anticipated that Mott Hall will absorb Civic Engagement's enrollment, which is currently 99 students.

With specific reference to comment 7 (and comment 2c more generally), which questions why Urban Institute is projected to serve 100 fewer students than the consolidated Mott Hall, the DOE notes that its projections are based on the assumption that the consolidated Mott Hall will enroll the students who would be expected to attend Civic Engagement in the 2016-2017 school year without the proposed consolidation. Urban Institute was not identified for consolidation with Civic Engagement as part of this proposal.

With specific reference to comments 4(c) and 5(f), as indicated in the EIS, the District 8 Community Superintendent is considering implementing future changes to the admissions methods at Urban Institute and the consolidated Mott Hall that may result in increased future enrollment at these schools. Based on contractual maximum class size regulations, Urban Institute and the consolidated Mott Hall are each able to accommodate up to approximately 396 students within their space allocations pursuant to the Citywide Instructional Footprint. The DOE's enrollment projections for Urban Institute, Delta, and the consolidated Mott Hall presented in the EIS do not take into account any enrollment changes that may result from future changes that the District 8 Community Superintendent may make in collaboration with the Office of Student Enrollment, principals, and other DOE offices.

Comments 2(d) and 3(a, b) express concerns about the schools in X192 sharing the same space, bell schedules, lunch times, and programming.

If the proposed co-location is approved by the PEP, the Building Council, consisting of principals from the co-located schools, is encouraged and empowered to work together, and with the Office of Space Planning, to determine a shared space plan that minimizes the disruption to the schools and the current use of shared spaces and that provides sufficient time for all students to be served (e.g., in the gymnasium and cafeteria). In any building where more than one school is co-located, the Building Council meets regularly to address issues related to space allocations, shared space usage, and space issues.

If the principals are unable to agree upon a schedule for shared spaces, school leaders should utilize the dispute resolution process outlined in the Campus Policy Memo, which is available at <http://schools.nyc.gov/community/campusgov>.

With respect to comments 2(d) and 3(a), this proposal will actually reduce the number of school organizations located in the building that will need to share space. Currently, four school organizations work together to share the X192 building; if anything, reducing the number of school organizations in the building from four to three should simplify the schedule that is already in place in the building.

With respect to comment 3(b), most of the growth projected for the X192 building relates to Delta's phase-in to the building, which was already planned and does not result from this consolidation proposal. When all school organizations are at full scale in the 2020-2021 school year, the DOE projects a building utilization rate of 79%-88%, suggesting that the building will not be overcrowded.

Comment 2(e) asks whether the DOE will take the enrollment projections from the EIS into consideration when it creates the budgets for Urban Institute and Mott Hall.

If the PEP approves this proposal to consolidated Civic Engagement with Mott Hall, budgets will be set based on Fair Student Funding ("FSF") per capita allocation levels. Schools also receive additional funds for students with disabilities, English Language Learners, and those students with other supplemental academic needs. Mott Hall's total enrollment is expected to increase as a result of the consolidation, and as a result Mott Hall's budget is expected to increase to reflect the additional pupils. Urban Institute's enrollment is not projected to significantly increase or decrease as a result of the consolidation. However, FSF is adjusted each year based on schools' actual enrollment as of the October 31 Unaudited Register. Please refer to the FSF Guide and FY16 School Allocation Memorandum 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 this consolidation. The FSF Guide is available at: http://www.nycboe.net/AdminOrg/Finance/budget/dbor/dbor_intranet/DFPM_Budget_Resources/fy16/docs/FSF_School_Budget_Resource_Guide.pdf.

Comments 5(a, b, e, f, h, i) and 7 relate to the DOE's decision-making process for proposing significant changes in school utilization, including school consolidations, and raise questions about whether Urban Institute might be the subject of a future consolidation proposal.

With specific reference to comment 5(f), consolidation decisions are made on a case-by-case basis in partnership with the superintendent and impacted school communities. They are intended to improve under-enrolled schools and address the budgetary, programmatic, and performance challenges that arise as a result of low enrollment.

In response to comment 5(b), although many central DOE employees work in offices that are not located in the Bronx, the DOE does extensive engagement at the school level to gather information from the impacted school communities. For this proposal, the following meetings were held in the Bronx:

- A presentation made to CEC 8 on September 28, 2015 by the Office of District Planning, at which the District 8 Superintendent announced the proposed consolidation. The principals of Civic Engagement and Mott Hall were among those in attendance.
- A meeting led by the District 8 Superintendent with staff and leadership of Civic Engagement and Mott Hall on September 29, 2015, at which the Superintendent discussed the proposed consolidation.
- Parent meetings and information sessions were held on October 2, 2015 for both Civic Engagement and Mott Hall.
- A walkthrough of X192 with a Deputy Chancellor on October 20, 2015 to discuss the proposal further and take questions and concerns from the school communities in advance of the PEP vote. Participants included the District 8 Superintendent as well as representatives from the Office of the Superintendent, the Office of District Planning, the Office of Space Planning, the Office of School Design, the United Federation of Teachers, CEC 8, Mott Hall's SLT, Civic Engagement's SLT, Urban Institute's SLT, and Delta's SLT. The walk-through began with a meeting led by the Deputy Chancellor during which the rationale for consolidation was discussed and all participants had the opportunity to ask questions and have them answered by the Deputy Chancellor and representatives from other offices.
- The joint public hearing held on December 7, 2015 at the X192 building.

In this way, in response to comment 5(h) the DOE aims never to “surprise” the public. The DOE is committed to engaging with the community for all proposals to implement a significant change in school utilization, as detailed in Chancellor’s Regulation A-190. Chancellor’s Regulation A-190 sets out the public review and comment process that the DOE undertakes with respect to all such proposals by the Chancellor, including consolidations. In addition to the above-described meetings, the following communications were circulated about the current proposal to consolidate Civic Engagement with Mott Hall:

- Letters discussing the potential consolidation sent home with students of Civic Engagement and Mott Hall on September 29, 2015.
- Parent letters provided by the DOE, for distribution to the Mott Hall, Civic Engagement, Urban Institute, and Delta communities about the proposal after the EIS was posted on October 30, 2015, which described the proposal and included information about the upcoming Joint Public Hearing and PEP vote.
- Separate notices for the Joint Public Hearing and PEP vote were provided to the school communities for distribution on October 30, 2015.
- An Amended Educational Impact Statement and amended notices for the Joint Public Hearing and the PEP were also provided to the school communities for distribution on November 18, 2015.

In response to comments 5(f, h) and 7, the DOE has no current plans to propose Urban Institute for school consolidation. For any future proposed changes in school utilization, the DOE would need to issue a separate EIS and adhere to all other requirements of the Chancellor’s Regulation A-190.

Comments 5(b, e) express concerns that PEP proposals are predetermined.

All proposals must be voted on by the PEP to be approved for implementation. No decision has yet been made on this proposal. As mentioned, the PEP is scheduled to vote on this proposal, along with other proposals, at its December 16, 2015, meeting at High School of Fashion Industries, 225 West 24th Street, New York, NY 10011.

Comments 4(b) and 6 are in support of the proposal and therefore do not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.