

Public Comment Analysis

Date: December 15, 2015

Topic: The Proposed Consolidation of J.H.S. 057 Whitelaw Reid (16K057) with M.S. 385 School of Business, Finance, and Entrepreneurship (16K385) in Building K057 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 describing a proposal to consolidate J.H.S. 057 Whitelaw Reid (16K057, “J.H.S. 057”), an existing district middle school that currently serves students in sixth through eighth grades, with M.S. 385 School of Business, Finance, and Entrepreneurship (16K385, “M.S. 385”), an existing district middle school serving students in sixth through eighth grades, in building K057 (“K057”), located at 125 Stuyvesant Avenue, Brooklyn, NY 11221, in the 2016-2017 school year. M.S. 385 and J.H.S. 057 are currently co-located in K057 with The Brooklyn Academy of Global Finance (16K688, “BAGF”), an existing district high school that serves students in ninth through twelfth grades. 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 DOE is proposing to consolidate J.H.S. 057 and M.S. 385 because both schools have struggled with low enrollment, which creates budgetary and programmatic challenges. A “consolidation” means that two or more existing school organizations are combined into one school to operate and serve students more effectively. If this proposal is approved, M.S. 385 and J.H.S. 057 will be combined such that students, staff, and resources of M.S. 385 will become part of J.H.S. 057 and M.S. 385 will no longer exist as a distinct school option as of the 2016-2017 school year.

In a separate proposal, the DOE is concurrently proposing to re-site Frederick Douglas Academy IV (16K393, “FDA IV”) from building K026 to K057. A “re-siting” means that students will attend classes in a building different from the building in which they currently attend classes. These proposals are not contingent on one another and will be voted on separately by the Panel for Educational Policy (“PEP”).

The DOE is proposing to consolidate M.S. 385 with J.H.S. 057 based primarily on the benefits students in both school communities would derive from the additional resources made available by consolidating the two school organizations into one. If this proposal is approved, M.S. 385 students attending the consolidated J.H.S. 057 will have access to a variety of academic and enrichment opportunities, such as extended day tutoring, creative arts programs, and other interventions and supports that J.H.S. 057 will provide. In addition to increased resources, the consolidation will allow the schools to combine the strengths and best practices of each individual school into a single, larger organization.

This proposal has been developed by the District 16 Superintendent in conjunction with the principals of M.S. 385 and J.H.S. 057 and the school communities through a collaborative planning process. In addition to working with the school communities, the Superintendent has worked closely with various DOE offices and the principals of M.S. 385 and J.H.S. 057 to determine the best path to support the students at both schools. The collaborative planning process culminated in a decision to consolidate these schools into one stronger middle school option.

Collaboration between J.H.S. 057 and M.S. 385 has already begun. These schools are already co-located, and throughout the 2015-2016 school year, staff from both schools will increase collaboration, focusing on developing shared instructional practices, sharing resources, and building a cohesive school culture. The schools are also engaged in shared activities, such as field day and an end-of-year school community BBQ. In addition to these efforts, the schools have initiated collaborative planning activities with staff and families. These activities will

continue throughout the year to ensure the consolidation is seamlessly executed in the 2016-2017 school year, if approved.

If this proposal is approved, the newly consolidated J.H.S. 057 will serve approximately 210-240 students in the 2016-2017 school year. The projected utilization rate of the building that year is expected to be 35-46% if both this proposal and the proposal to re-site FDA IV are approved, and 30%-37% if only the consolidation proposal is approved. In either event, building K057 has sufficient space to accommodate the consolidated J.H.S. 057 in K057 if this proposal is approved.

The details of this proposal have been released in an EIS, which can be accessed here:

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

Copies of the EIS are also available in the main offices of J.H.S. 057, M.S. 385, and BAGF.

Summary of Comments Received

Public engagement was conducted by the DOE in the course of creating this proposal, which included:

- An announcement by the District 16 Community Superintendent of the potential consolidation to the School Leadership Teams (“SLT”) and staff members of M.S. 385 and J.H.S. 057 on June 12, 2015.
- Letters discussing the potential consolidation sent home with students of J.H.S. 057 and M.S. 385 on June 15, 2015.
- On October 21, 2015, a Deputy Chancellor from the DOE conducted a walkthrough of K057 and a SLT Debrief was held. At the Debrief, DOE representatives were available to answer questions and address concerns from representatives of the impacted school communities in advance of the PEP vote. Participants included representatives from the DOE’s Office of District Planning and Office of Space Planning, the District 16 Community Education Council (“CEC 16”), J.H.S. 057’s SLT, BAGF’s SLT, FDA IV’s SLT, and M.S. 385’s SLT.

The DOE also held a Joint Public Hearing regarding this proposal at K057 on November 30, 2015. At that meeting, interested parties had an opportunity to provide input on both the proposal to consolidate J.H.S. 057 and M.S. 385, and the proposal to re-site FDA IV to K057. Approximately 80 members of the public attended the hearing. There were seventeen (17) speakers. Individuals present at the meeting included: Deputy Chancellor of Operations and Chancellor’s Designee, Elizabeth Rose; District 16 Superintendent, Evelyn Santiago; Brooklyn High School Superintendent, Karen Watts; CEC 16 President, NeQuan McLean; CEC 16 representatives, Ralph Yozzo and Susana Clarke; J.H.S. 057 Principal, Celeste Douglas; J.H.S. 057 SLT member, June Boyd; M.S. 385 Principal, Anne Marie Malcolm; M.S. 385 SLT member, Kieshelle Cudjoe; BAGF Principal, Dannielle Darbee; BAGF SLT member, Pauline Brown; FDA IV Principal, Elvin Crespo; FDA IV SLT member, Alexander Bodas; and Jonathan Geis, Jyoti Folch, and Greg Whitten from the DOE.

The following comments and remarks were made at the Joint Public Hearing on November 30, 2015:

1. CEC 16 president, NeQuan McLean, commented that the CEC 16 supports both proposals, and CEC 16 representative Ralph Yozzo will read the resolutions passed in support of these proposals at the November 17, 2015 CEC 16 public meeting.
2. CEC 16 representative, Ralph Yozzo, commented as follows:
 - a. CEC 16 passed a resolution in support of the proposal to consolidate J.H.S. 057 and M.S. 385, based on the understanding that District 16 continues to experience declining academic enrollment, that low enrollment will eventually cause the schools to close, and that the proposed consolidation is necessary to ensure that students receive the quality educational services that they deserve.
 - b. CEC 16 passed a resolution in support of the proposal to re-site FDA IV to K057, based on the understanding that high school aged students should not be located in the same buildings as elementary school students, that there is sufficient space in K057 with other schools serving students in the same

- age group, and that K057 will provide FDA IV students with needed high school facilities.
- c. CEC 16 feels that information in both proposals could have been communicated in a more forthright and transparent way, and the CEC 16 requests that the DOE work to improve how information is communicated to parents and improve transparency in such practices, and work to improve how proposals can better involve parent input.
3. FDA IV SLT representative, Alexander Bolas, commented that he supports the proposal to re-site FDA IV, as FDA IV is a small school without many resources, and this proposal allows FDA IV students to have access to more classes, resources, and extra-curricular activities.
 4. Dannielle Darbee, Principal of BAGF, commented that she welcomes the opportunity for FDA IV to join building K057. BAGF also has low enrollment, so she is looking forward to combining resources and opportunities with students in FDA IV.
 5. Anne Marie Malcolm, Principal of M.S. 385, commented that M.S. 385 has had issues providing enough resources for students due to low enrollment; consolidating schools is a great approach to ensure that students have the best options academically.
 6. Celeste Douglas, Principal of J.H.S. 057, commented that J.H.S. 057 has low enrollment and is excited for the opportunity to consolidate with M.S. 385. She does not want to let this opportunity pass by.
 7. Elvin Crespo, Principal at FDA IV, commented that he supports the proposal to re-site FDA IV and looks forward to receiving the decision soon.
 8. A student commented that she feels that both schools should consolidate because the school could then offer more activities and classes for students, which would make it more popular for future students.
 9. A student commented as follows:
 - a. He feels that it is a good idea for the schools to consolidate because it means that the school could offer more classes and there would be more students to meet and interact with, which would help with learning overall.
 - b. He questioned the effect of consolidation for teachers, staff, and faculty, and was concerned that the consolidation would lead to people losing their job.
 10. Multiple commenters stated that they felt the decision had already been made regarding the results of the consolidation proposal.
 11. Multiple commenters stated that they felt more engagement should have been done with the school communities, and that engagement should have occurred earlier in the process.
 12. Multiple commenters expressed support for the consolidation proposal, stating that low enrollment in both schools has led to a lack of resources and opportunities for current students.
 13. Multiple commenters questioned what would happen to faculty and staff if the consolidation occurs.
 14. One commenter expressed sentiment that the PEP meeting discussing these proposals should be held in Brooklyn, rather than Manhattan.
 15. One commenter expressed concern that the proposal to consolidate would lead to large class sizes.
 16. One commenter questioned how this proposal might impact safety and security in the consolidated school.
 17. One commenter expressed support for the principal of M.S. 385.
 18. One commenter asked about the composition of PEP members.

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

The following comments were submitted through the dedicated phone number.

The DOE received two (2) voicemails through the dedicated phone number for this proposal.

19. One commenter expressed the sentiment that the PEP meeting to discuss the consolidation proposal should be held in Brooklyn, rather than Manhattan.
20. One commenter expressed that parents and community members should have been included earlier in the process for the proposal to consolidate J.H.S. 057 and M.S. 385.

The following comments were submitted through the dedicated email address.

The DOE received zero (0) emails through the dedicated email address for this proposal.

Analysis of Issues Raised, Significant Alternatives, Significant Alternatives Proposed

Comments 1, 2(a), 5-6, 8, 9(a), and 12 are in favor of the proposal and do not require a response.

Comment 17 expresses support for the principal of M.S. 385, and similarly does not require a response.

Comments 2(c), 11, and 20 offer the opinion that the DOE should have more thoroughly engaged the communities impacted by this proposal.

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 co-locations and consolidations. In addition to the information about this proposed consolidation provided in the EIS, the DOE has also provided this information through public engagement for this proposal. The DOE provided parent letters for distribution to the J.H.S. 057, M.S. 385, and BAGF school communities about the proposal after the EIS was posted, 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 also provided to the school communities for distribution. Last, this proposal and notices for the Joint Public Hearing and PEP hearing have been posted to the DOE website since October 30, 2015, available at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/December2015SchoolProposals>.

In addition, before this proposal was posted to the DOE website, on June 12, 2015 the District 16 Superintendent announced this proposal to the SLT and staff members of J.H.S. 057 and M.S. 385, and letters were sent home with students of both schools discussing this considered proposal on June 15, 2015. Further, on October 21, 2015 the DOE conducted a walkthrough and SLT debrief of building K057 led by a Deputy Chancellor where members of J.H.S. 057's, M.S. 385's, BAGF'S, and FDA IV's SLT were all present, in addition to individuals from CEC 16, the Office of District Planning, the District 16 Superintendent, and the Office of Space Planning. Last, the DOE offered each school impacted by this proposal the opportunity to request an optional community meeting to further discuss this proposal, though no schools requested that meeting.

In addition to the above-described events that took place before this proposal will be voted upon and those set out by Chancellor's Regulation A-190, the Office of District Planning attended the CEC 16 public meeting on November 17, 2015, where this proposal and other considered proposals for District 16 were discussed, and where representatives of the Office of District Planning and the District 16 Superintendent answered questions about this proposal and others from present District 16 community members.

Comments 9(b) and 13 question how this proposal will impact faculty and staff in either school as a result of this proposal.

As discussed in the EIS that describes this proposal, if this proposal is approved, some M.S. 385 and/or J.H.S. 057 staff members may be excessed when the school is consolidated. Where possible, the DOE will seek to minimize excessing of represented staff during any approved school consolidation. In the event that staff excessing is required, staff from M.S. 385 and J.H.S. 057 will be merged into one list to determine seniority by license, and all contractual rules regarding excessing will apply.

Barring system-wide layoffs, excessed teachers will be eligible to apply for other City positions, and any teachers who do not find a permanent position will be placed in the absent teacher reserve pool ("ATR"), meaning that they will continue to earn their salary while serving as substitute teachers in other City schools.

This proposal is not expected to impact the staffing of BAGF or FDA IV.

Comment 10 expresses belief that the results of this proposal's vote have already been determined.

No decision has been made yet on this proposal. As with all proposals governed by Chancellor's Regulation A-190, the final determination of whether or not to approve this proposal is left to the PEP. The PEP will vote on this

proposal and others at its upcoming December 16th meeting, scheduled to take place at High School of Fashion Industries, located at 225 West 24th Street, New York, NY 10001.

Comments 14 and 19 expresses sentiment that since this proposal pertains to schools in Brooklyn, this PEP meeting should be held in Brooklyn.

At any given meeting, the PEP votes on several proposals impacting schools across the city and the monthly meeting locations vary from month to month. Throughout the school year, PEP meetings rotate amongst locations throughout all five boroughs. All boroughs host at least one PEP meeting per calendar year. Locations are chosen based on the school's ability to accommodate large public meetings and convenience to public transportation as well as accessibility.

Comment 15 expresses concern that this proposal will lead to larger class sizes.

If this proposal is approved, the DOE projects that combined enrollment of the consolidated J.H.S. 057 would range between 70-80 students, or 3 sections per grade. While these classes may be larger than some of the current classes offered in either J.H.S. 057 or M.S. 385, these classes are not expected to approach or exceed the UFT contractual maximum for serving students, which is 32 students per class.

In addition, the goal for a larger student population is one reason why this proposal is being submitted to the PEP, as the current low enrollment numbers in J.H.S. 057 and M.S. 385 have led to budgetary challenges for the schools to offer diverse and enriched curricula and extra-curricular activities. Though small class sizes may offer teachers additional opportunity to spend more time on individual student needs, small class sizes can cause budgeting and operational difficulties for a school to function more broadly. If in fact class sizes do increase in the consolidated J.H.S. 057, the DOE is confident that teachers and staff in J.H.S. 057 will be able to continue effectively serving the students that they teach.

Comment 16 questions how this proposal might impact safety in building K057.

As discussed in the EIS that presents this proposal, if this proposal is approved, all schools in building K057 as of the 2016-2017 school year will develop a safety and security plan for the building prior to the first day of school in September 2016.

The DOE makes the following safety and security supports available to schools:

- Providing "Best Practices Standards for Creating and Sustaining a Safe and Supportive School" as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

Comment 18 inquired who comprises the PEP.

The PEP is comprised of 13 members: one (1) member is appointed by each borough President, and eight (8) members are appointed by the New York City Mayor. More information about the PEP, including its current members, bylaws, hearing schedule, and more, can be located at the PEP website <http://schools.nyc.gov/AboutUs/leadership/PEP/default.htm>.

Comments 2(b), 3, 4 and 7 pertain to the proposal to re-site FDA IV, which was also discussed at this Joint Public Hearing. As these comments relate to the separate proposal to re-site FDA IV to K057, they will not receive comment in this Public Comment Analysis; instead, analysis of these comments can be found in the separate Public Comment Analysis released to accompany the proposal to re-site FDA IV to K057. A link to the Public Comment Analysis discussing the proposal to re-site FDA IV to K057 can be found at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/December2015SchoolProposals>.

Changes Made to the Proposal.

No changes have been made to this proposal.