Department of Education
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Chancellor

Date: March 22, 2010

Topic: Proposed Co-location of a New School, International High School at Union Square (02M438), with Existing Schools in School Building M460

Date of Panel Vote: March 23, 2010

Summary of Proposal

In the 2010-2011 school year, International High School ("IHS") at Union Square, a new high school that will serve grades 9-12, is proposed to open in school building M460, the Washington Irving campus, located at 40 Irving Place in Community School District 2. IHS will co-locate with several schools at Washington Irving. They are: Washington Irving High School (02M460), Gramercy Arts High School (02M374), and the High School for Language and Diplomacy (02M399). The Washington Irving campus contains sufficient space for all four schools to operate at full capacity.

IHS will provide another high-quality educational option for Manhattan students and residents of other boroughs seeking to take advantage of the school's specialized program. IHS will serve English Language Learners who have been in the country for less than four years and who speak a variety of languages. The school will open with a ninth-grade of approximately 100-125 students and will grow one grade per year. The siting of IHS in M460 with Washington Irving, the High School for Language and Diplomacy, and Gramercy Arts addresses the need to offer high quality high school options throughout the City and will provide additional options for students who are English Language Learners.

IHS will be an International Network school. There are currently 10 International Network Schools throughout New York City. These schools have shown a strong track record of supporting their high-need students to succeed in school. Seven of the existing ten International Network Schools have been open long enough to receive a 2008-2009 Progress Report, and all seven of those schools received A grades on their 2008-2009 Progress Reports.

The Washington Irving campus contains sufficient space for its three current schools to operate at scale even when IHS grows to full capacity. The 2008-2009 target capacity of M460 was 2,858 students and the target utilization for the building was 72 percent, with combined campus enrollment of 1,942 students. At full capacity, IHS will add 425-475 students to the building, still leaving total enrollment levels below target utilization. Another school on the

campus—the High School for Language and Diplomacy—opened in September 2009. Next year, the school will serve approximately 200-250 students in ninth and tenth grade, and like IHS, the school will eventually grow to serve between 425-475 students in total. At the same time, however, demand for seats has been declining at Washington Irving High School, and enrollment at that school is in the process of being downsized from its current level of 1,449 students to a smaller enrollment of 900-1,000 students. The DOE also believes that Washington Irving High School will be better able to meet the needs of its students at this smaller size.

An educational impact statement on this proposal was posted on the Department of Education's Web site on February 2, 2010.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing was held at M460 on March 15, 2010, and all interested parties had an opportunity to provide input on the proposal. Forty members of the public attended the hearing, and eight people spoke. All eight members of the public spoke in opposition to the proposal, citing concerns about capacity in M460, potential conflicts between schools and students that may arise from sharing facilities, and the potential impact of the co-location on Washington Irving High School.

Summary of Issues Raised in Written and Oral Comments and Significant Alternatives Suggested

One advocacy organization submitted general comments objecting to all proposed co-locations of schools being considered by the Panel on March 23, 2010. A summary and analysis of these comments is included in the attached appendix. In addition to making general comments about co-locations of schools, this submission included a specific comment about the IHS proposal. It stated that class size at the Washington Irving campus could be lowered if the DOE did not use existing space in the building to co-locate another school.

No significant alternatives were proposed.

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

The 2008-2009 target utilization rate of the Washington Irving campus was 72%, and its target capacity is 2,858. The combined audited register of Irving, Gramercy Arts, and the HS for Language and Diplomacy is 1,942 students. The Washington Irving campus has sufficient space to accommodate IHS, Washington Irving High School, Gramercy Arts, and the HS for Language and Diplomacy. According to the 2008-2009 Building Room Survey, M460 has 98 full size instructional classrooms. These rooms include specialty rooms, regular classrooms and science labs. There are also 14 half size instructional classrooms in the building. According to the citywide instructional footprint, Washington Irving High School should be allocated a minimum of 55 rooms based on its 2009-2010 enrollment. Gramercy Arts should be allocated a minimum of 16 classrooms in 2010-2011, The High School for Language and Diplomacy should be allocated a minimum of 8 classrooms in 2010-2011 and IHS should be allocated a minimum of 4

classrooms in 2010-2011. This is based on current and projected enrollment for 2010-2011 and will be verified with a survey of the building. As IHS and HS for Language and Diplomacy are phased-in and Washington Irving High School's enrollment is reduced, the total building enrollment will still be significantly less than the capacity of the building so that each school will still have sufficient space to accommodate their needs. A building council will be formed with the Principals at each school to address the use of shared spaces within the building.

One commenter suggested that class sizes at the Washington Irving campus could be lowered if the DOE did not use existing space in the building to co-locate another school. However, siting of IHS in the Washington Irving campus directly addresses a need for a school to serve English Language Learner students on the Washington Irving campus. Furthermore, the Washington Irving campus had a 2008-2009 target utilization of 72 percent, indicating that there is existing unused space in the building. The co-location of an additional school would not prevent the lowering of average class size.

A copy of the educational impact statement for this proposal can be obtained at http://schools.nyc.gov/NR/rdonlyres/676176D9-06BC-42A9-9C45-C5D3C5110CD3/76854/M460_InternationalHighSchoolEIS_Final1.pdf.

Appendix: Response to General Comments Regarding Proposed Co-locations of Schools

Summary of Issues Raised and Significant Alternatives Suggested

One advocacy organization submitted general comments objecting to all proposed co-locations of schools. In opposing the DOE's proposed co-locations, the comments cited the following reasons: (1) the DOE did not use accurate data in analyzing the utilization and capacity of school buildings; (2) the utilization formula used by the DOE is inadequate and assumes inappropriate target class sizes; (3) charter schools and the DOE's new small schools enroll fewer high needs students than district and citywide averages, leading to higher concentrations of high needs students in district schools; and (4) the expansion of charters and new small schools has eliminated critical space from existing district schools.

The comments suggest a moratorium on any new co-locations until an independent review is conducted to assess the capacity in existing public school buildings and make determinations about the amount of space required to reduce class size to mandated levels.

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

The comments assert that the DOE did not use accurate data in analyzing utilization and capacity of school buildings. The data used in analyzing the utilization and capacity of school buildings comes from "The Enrollment, Capacity and Utilization Report" (also known as the "Blue Book"), which is the standard by which the DOE measures the maximum capacity of a school building compared to the enrollment. These calculations are based on information provided by principals in the Annual Facilities Survey conducted by the School Construction Authority. In addition to considering the Blue Book information, the DOE conducts a physical survey of school buildings and takes into consideration current programming prior to proposing a change in utilization.

With regard to the comment regarding the use of inappropriate target class sizes, the DOE does use aspirational targets for school buildings but feels that these goals are appropriate for ensuring a quality education for all students. The DOE understands that building usage varies by schools and leaves programming decisions to school leaders. However, it is important to have a standard means of assessing the use of our limited physical plant resources consistently across the city. The class size targets used for the 2008-2009 Blue Book calculations of target capacity and utilization are lower than those used for determining historical capacity and utilization.

Specific reference was made to targets in the City's Contracts for Excellence (CFE) class size reduction plan. DOE proposals for the co-locations of schools are based on current class sizes and the available space in each applicable building according to the citywide instructional footprint which prescribes the number of classrooms needed for each school. Proposals are not based on the space needed for a school to achieve class size reduction targets. The CFE targets are aspirational, are predicated upon levels of State CFE funding that may not occur due to the national recession, and do not reflect current class sizes. The DOE does not believe that the proposed co-locations will increase class size.

The comments assert that charter schools and the DOE's new small schools enroll fewer high needs students than the citywide and district averages, thereby leading to higher concentrations of high needs students in district schools. It is important to note that charter school admissions are done by lottery as required by State Education Law. Charter schools do in fact serve the full range of public school students as do the DOE's new small schools. The new small schools that have been created over the last six years are serving English language learners and special education students at a higher rate than schools citywide, with better outcomes. On average the new schools have a graduation rate of 75%. During the 2008-2009 school year, ninth-grade enrollment at new schools included 14.2 percent special education students and 13.6 percent English language learners, compared to 12.8 percent special education students and 10.3 percent English language learners citywide. When looking across a school's entire population, they also serve more special education students and ELL students than the citywide average. In 2008-2009, new schools served an average of 12.3 percent special education students and 12.6 percent English language learners compared with 11.6 percent and 10.8 percent, respectively, citywide.