



Amended Public Comment Analysis

Date: March 22, 2011

Topic: The Proposed Co-location of I.S. 355 (29Q355) and I.S. 356 (29Q356) with I.S. 231 Magnetech 2000 (29Q231) in School Building Q231

Date of Panel Vote: March 23, 2011

This amended Public Comment Analysis is being further amended to include comments that were received at the March 15th hearing.

Summary of Proposal

The New York City Department of Education (“DOE”) proposes to site two new zoned middle schools, I.S. 355 (29Q355, “I.S. 355”) and I.S. 356 (29Q356, “I.S. 356”) in school building Q231 (“Q231”), located at 145-00 Springfield Boulevard, Springfield Gardens, NY 11413 in Community School District 29. If this proposal is approved, these two schools would be co-located with an existing middle school, I.S. 231 Magnetech 2000 (29Q231, “I.S. 231”). Q231 also houses an Alternative Learning Center (Q987, “ALC”) that would remain in the building and be co-located with the new schools.

In a separate Educational Impact Statement (“EIS”) also published on December 17, 2010 and amended on January 25, 2011, the DOE has proposed that I.S. 231 gradually phase out because of its low performance. I.S. 231 is currently a zoned middle school serving grades six through eight. If that proposal is approved, I.S. 231 would no longer admit sixth-grade students after the conclusion of the 2010-2011 school year. One grade would then be phased out at I.S. 231 each year. Students currently in grades six and seven would complete middle school at I.S. 231 while the phase-out plan is implemented. During the 2011-2012 school year, I.S. 231 would only serve students in grades seven and eight. In 2012-2013, I.S. 231 would serve only students in grade eight.

These two new zoned schools, I.S. 355 and I.S. 356, would admit students based on a campus choice model. This means that zoned students would be guaranteed a seat in at least one of the two schools, but would be able to use a modified middle school choice process in order to rank the two schools in order of preference. I.S. 355, I.S. 356 and the ALC would be “co-located” with I.S. 231 as I.S. 231 phases out and would continue to be co-located with each other after the I.S. 231 phase-out is complete. 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. Once I.S. 355 and I.S. 356 have completed their expansions and I.S. 231 has completed its phase-out, there would be approximately 840-960 students served in the building.

In 2009-2010, Q231 had a target capacity to serve 1,226 students. I.S. 231 had a target organizational capacity to serve 1,134 students and enrolled 931 students, yielding a target organizational utilization rate for I.S. 231 of 82%, excluding the ALC. This means that the building was “underutilized” and had extra space to accommodate additional students.

Copies of the original and amended EIS for both the phase-out and co-location proposals are available in the main office of I.S. 231 and at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Mar232011Proposals.htm>.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at I.S. 231 Magnetech 2000 on January 26, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 195 members of the public attended the hearing, 25 people offered comments on the proposal and 16 questions were submitted. Present at the meeting were I.S. 231 School Leadership Team members Desmond Poyser and Joanne Bouillion Middleton; CEC 29 members Herman Bagley and Bill Perkins; Deputy Chancellor Shael Suransky; District 29 Superintendent Lenon Murray; Anthony Conelli of the Division of School Support and Instruction; CCHS representative Monica Ayuso; Donovan Richards representing Councilman Sanders and Ernest Flowers representing Assemblyman William Scarborough.

An additional public hearing regarding this proposal was held at I.S. 231 on February 28th, 2011. Approximately 44 members of the public attended the hearing, 17 people offered comments on the proposal and 1 question was submitted. Present at the meeting were I.S. 231 School Leadership Team members Desmond Poyser and Joanne Bouillion Middleton; Deputy Chancellor Marc Sternberg; District 29 Superintendent Lenon Murray; Melissa Harris of the Office of Family Information and Action; Cluster Leader Debra Maldonado; and Network Leader Mae Fong. CEC 29 was invited to attend the hearing but no CEC 29 representatives attended.

A second additional public hearing regarding this proposal was held at I.S. 231 on March 15, 2011. Approximately 40 members of the public attended the hearing, 12 people offered comments on the proposal and 15 questions were asked or submitted to the panelists. Present at the meeting were I.S. 231 Principal Emmanuel Lubin; Deputy Chancellor Marc Sternberg; District 29 Superintendent Lenon Murray; Melissa Harris of the Office of Family Information and Action; Francisco Baez representing Cluster Leader Debra Maldonado; and Annette Kunin representing the CFN. The I.S. 231 SLT and CEC 29 were both invited to the hearing and at least one member from each organization had indicated that they were available to attend, but no SLT members (besides Principal Lubin) or CEC 29 representatives attended the hearing.

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

1. Herman Bagley, member of CEC 29, read a statement on behalf of the CEC expressing support for I.S. 231 and disappointment that I.S. 231 had been proposed for phase-out. He cited the New York State Education Department’s reconfiguration of scores and said that all schools should be given another year to prove themselves. He expressed support

for the two new schools proposed to replace I.S. 231 as well as the students, teachers and staff at I.S. 231. He noted that the CEC tried to dissuade the DOE from having the hearing because of the weather.

2. Desmond Poyser, Academic Coordinator for the Carson Academy and SLT Chairman, made a statement in support in support of I.S. 231. He said that I.S. 231 is a school on the rise and spoke to the administration's efforts over the summer to improve the school. He asked for time for the changes made at I.S. 231 to mature. Mr. Poyser asked what will happen to the neighborhood children with the arrival of the two replacement schools and cited the cost of replacing a school.
3. One commenter voiced his opposition to the phase-out of I.S. 231 and questioned the strategy of replacing large schools with multiple, smaller schools.
4. One commenter questioned whether the replacement schools showed more promise of success than I.S. 231.
5. Multiple commenters advocated providing I.S. 231 with more funding rather than replacing it with new schools.
6. One commenter said the DOE ought to open two new schools alongside I.S. 231 rather than in place of it.
7. One commenter critiqued the format of the hearing, saying that the DOE is doing only what is legally mandated as a result of the lawsuits that prevented phase-outs in 2010. He said the DOE has no plans for the schools and is trying to incite divisions among communities. He asked who would hold accountable the administrators at the DOE who allowed schools decline to the point where phasing out was the last remaining option.
8. At the March 15th hearing, one commenter asked if there were targets for class size in the schools intended to replace I.S. 231. The commenter then sought confirmation that the DOE expects student achievement to improve without reducing class sizes.
9. At the March 15th hearing, one commenter asked when principals had been selected to lead the schools intended to replace I.S. 231. The commenter said the hearings felt like a waste of time because the leaders had already been chosen.

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

10. Multiple questions were submitted regarding the decision to move forward with the hearing despite weather conditions:
 - a. How much community input was expected as a result;
 - b. If the mayor appoints the Chancellor and her deputies, how come they cannot postpone the meeting;
 - c. How can the DOE show such disregard for the safety of the community;
11. One question was submitted asking how DOE staff can sleep at night.

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

12. The PTA of PS/MS 156, which is a feeder school for I.S. 231, suggested that the parents and community of PS/MS 156 would like to see a Math and Science School or a Drama and Art School in the building.

13. One commenter stated that they had been a part of a meeting in January 2009 regarding a different issue at the DOE and had submitted a proposal for a high quality middle school. The commenter cited the need for a school where some of the City’s most disadvantaged students can receive a good education including a Gifted & Talented program. The commenter suggested:
 - a. An Early College Initiate program for District 29 residents;
 - b. A school for District 29 residents with an application process that includes a letter from the child; the school would admit 50% of applicants below grade level and 50% at or above grade level;
 - c. A school for District 29 residents with an application process requiring a portfolio of work, on-site writing and math exams, student and parent interviews; or
 - d. A selective, competitive school, but with the additional requirements of on-site math, reading and writing assessments, recommendations and an interview.
14. The DOE received a document from the Tri-Community JHS 231 Parents Association regarding the phase-out and replacement of I.S. 231 but sharing suggestions in the spirit of collaboration. The community would like to be involved in all decision-making. Regarding the proposed replacements, it stated that the community supports the phase-in of two specialized schools as part of the Middle School Choice process, with one having a possible audition component. They stated their priorities as:
 - a. Productive use of existing facilities, resources and partnerships;
 - b. Desirable course curriculum making the school attractive to students and staff;
 - c. Transformation of I.S. 231 campus into “beacon of excellence.”
 The suggested names and descriptions for the replacement schools were:
 - a. “Katherine Dunham School of the Arts,” which will leverage existing facilities and partnerships in the arts;
 - b. “David Harold Blackwell School of Mathematics, Science and Technology,” which will leverage established relationships and forge new ones and prepare students for the range of high school with a math and science focus.

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

Comment 1 mentioned support for the proposed new schools and does not require a response.

With respect to comment 2, neighborhood children will continued to be educated in the Q231 building as in the past. I.S. 231 is a zoned school, which means that it does not screen its students, but instead admits them based on a system which gives priority to students residing within the catchment zone. The two replacement schools will admit students based on a Campus Choice model, which will give students the choice between the two schools, but which also guarantees all students living within the same zone a guaranteed seat at one of the two schools. In addition to the standard per pupil funding allocated to every district school, new schools receive a one time allocation of \$80,000 in their first year. This additional cost of starting new schools is described in further detail in section five of the EIS.

With respect to comment 3 and 4, the DOE believes that small schools are structurally better able to provide students a high quality education. Small schools allow more personalized learning

environments and individualized instruction for students and professional development for teachers. Additionally, the DOE compares schools to peer schools according to their student populations; specifically, there are schools with similar populations of high needs students as I.S. 231 that are achieving significantly better results. Only those schools consistently showing low performance have been proposed for phase-out.

With respect to comment 5, new schools funds are minimal—the annual support of \$30,000 is less than a first-year teacher’s salary. The DOE does not believe this sum, if provided over the 3 years new schools receive it, would be a significant means of turning I.S. 231 around.

With respect to comment 6, there is not sufficient space in Q231 to support the two new schools at scale along with I.S. 231 at scale. Additionally, the DOE does not believe I.S. 231 is capable of turning around quickly, and creating two new schools alongside it would not change this.

With respect to comment 7, joint public hearings are part of the legally mandated process for the DOE to implement significant changes to school utilization. The process is set forth in Chancellor’s Regulation A-190. Joint public hearings were also held in 2010, prior to the lawsuit the commenter mentioned. This year, in addition to conducting joint public hearing, the DOE also held several meetings with communities with schools proposed for phase-out. The DOE also held two additional public hearings and postponed the voting date for the I.S. 231 proposals in order to allow more time for the community to comment on the proposals. The DOE has carefully prepared plans for the replacement of I.S. 231. These include two schools that will meet the needs of the community, including the relatively high special education population and the large numbers of students living in the zone who are in foster care.

With respect to comment 8, the DOE has not stated class size targets for the new schools proposed to replace I.S. 231. Combined, the two schools will serve the same number of students served by I.S. 231 and class sizes will most likely remain consistent with what I.S. 231 has experienced in recent years, which is within UFT contractual class size limits. The DOE expects student performance to improve in the new schools as a result of many factors previously enumerated, including new systems and structures better equipped to support student needs and facilitate a cohesive mission around improving student achievement.

With respect to comment 9, leaders for the new schools proposed to replace I.S. 231 were selected in January 2011. The DOE believes it is necessary to identify leaders for new schools before the proposals to establish those schools are approved so that, if the schools are approved, the new leaders can begin working immediately to prepare for the upcoming school year. Like all new principals, the leaders selected for the schools proposed to replace I.S. 231 would be subject to the C-30 review process and would serve as interim acting principals until they satisfy C-30 requirements.

With respect to comment 12, the DOE has proposed two new school leaders who are creating schools that are academically strong in all subjects. Specifically, one of these schools is proposed to have an arts theme.

With respect to comment 13, the DOE accepts applicants for new schools on a yearly basis and evaluates the proposals and leaders during a rigorous, multi-stage process described here: <http://schools.nyc.gov/community/planning/newschools>. With respect to both comments 13 and 14, because I.S. 231 is a zoned, unscreened school, the DOE intends to replace it with unscreened options. However, the DOE is open to adding screened schools to the district.

With respect to comment 14, the DOE takes community feedback into account when developing new school proposals. Currently, one of the proposed schools is slated to have an arts theme. Both schools are unscreened. The DOE also selects and works with new school leaders, who ultimately choose the name for the school, as per Chancellor's Regulation A-860:

<http://schools.nyc.gov/NR/rdonlyres/381F4607-7841-4D28-B7D5-0F30DDB77DFA/97059/A8601202011FINAL.pdf>.

Changes Made to the Proposal

No changes were made to this proposal.