



Public Comment Analysis¹

Date: October 11, 2013
Topic: The Proposed Opening and Co-location of New District Middle School 16K762 (16K672) with Existing Schools P.S. 335 Granville T. Woods (16K335) and M.S. 584 (16K584) in Building K335 Beginning in 2014-2015
Date of Panel Vote: October 15, 2013

Summary of Proposal

On August 30, 2013, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to open and co-locate new district middle school 16K672 (“16K672”) in Building K335 (“K335”), located at 130 Rochester Avenue, Brooklyn, NY 11213, in Community School District 16 (“District 16”), beginning in 2014-2015. 16K672 would be co-located in K335 with P.S. 335 Granville T. Woods (16K335, “P.S. 335”) and M.S. 584 (16K584, “M.S. 584”). 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 October 15, 2013.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding the proposal was held at the K335 building on October 7, 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 2 people spoke. Present at the meeting were Community School District 16 Superintendent Evelyn Santiago; District 16 Community Education Council (“CEC 16”) President Felicia Alexander; P.S. 335 School Leadership Team (“SLT”) representative Principal Laverne Nimmons; and M.S. 584 SLT representatives Principal Gilleyan Hargrove, Natalie Cooper, and Rue Mann. Lily Haskins and Vicki De Javier from the DOE, Division of Portfolio Planning were also present.

The following comments and remarks were made at the joint public hearing on October 7, 2013 on the proposal:

1. Felicia Alexander, president of CEC 16, commented as follows:
 - a. She is adamantly opposed to the proposal.
 - b. The new school will take away resources that made the existing schools great.
 - c. Lunch takes places as early as 10:00 a.m.
 - d. Students are reprimanded for going into certain stairwells.
 - e. If parents are deemed complacent, the DOE sees the district as “pawns.”
 - f. Parents are the best advocates. They need to come together and make time to address educational issues, starting with attending monthly CEC meetings.
 - g. The concentration of the DOE’s efforts is seen less in affluent neighborhoods.
2. A parent from M.S. 584, whose daughter is in 8th grade and has been attending the school since 6th grade, commented as follows:

¹ This Analysis of Public Comments reflects those public comments received to date. The DOE will continue to accept public comments until Monday, October 14 at 6 p.m. If any additional comments are received, they will be addressed in an amended analysis.

- a. The teachers at M.S. 584 offer significant support to students.
- b. There are too many distinct programming schedules already, including 3 different schedules for lunch, gym, and the school bell that announces when it is time for the students to change classes during the day.
- c. The proposal will lead to smaller class sizes.
- d. She would like to know the reasoning behind creating a new middle school since there is already one in the building.

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 1(e), 1(f), 1(g), and 2(a) do not directly relate to the proposal and thus do not require a response.

Comment 1(a) voices general opposition to this proposal.

The DOE acknowledges that there is opposition to this proposal from some community members. There are times when the DOE and certain members of the community differ in their opinions about specific projects. 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 2(d) questions why the DOE is opening and co-locating a new middle school in a building that already contains a middle school.

Once again, 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. 16K762 will be a valuable addition to the community and will not prevent M.S. 584 from continuing to serve all students who enroll there.

Comment 1(b) concerns the availability of resources for DOE schools.

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 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 are 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.

The assignment of specific rooms and location for each in the building, including those for use in serving students with Individualized Education Programs ("IEPs") or special education needs, will be made in consultation with the principals of each school and the Office of Space Planning if this proposal is approved.

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 Guide² and FY14 School Allocation Memoranda³ 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.

New schools are funded in the same manner as other schools: funding follows the students and is based on need (incoming proficiency level and special education/ELL/Title I status). While it is true that new schools receive start-up funding, the start-up funding they receive is an average of \$30,000 per year over the first five years for an elementary or middle school and \$34,000 for a high school. These annual amounts are not even large enough to cover the salary of a first year teacher.

Comment 2(c) states that the proposal will lead to smaller class sizes.

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.

Below is a breakdown of the projected enrollment for P.S. 335, M.S. 584, and the proposed new middle school. The projections for P.S. 335 and M.S. 584 are based on the 2013-2014 Budget Register Projections, irrespective of a potential co-location of an additional school in the building. Moreover, as noted above, the number of class sections is based on a number of factors, enrollment being just one of them.

DBN	School Name	2013-2014 Enrollment	2014-2015 Projected Enrollment	2015-2016 Projected Enrollment	2016-2017 Projected Enrollment
16K762	16K762	-	85 - 95	170 - 190	255 - 285
16K335	P.S. 335	378	353 - 413	353 - 413	353 - 413
16K584	M.S. 584	125	85 - 115	75 - 105	75 - 105
Total Building Enrollment		503	523 - 623	598 - 708	683 - 803
Utilization		49%	50% - 60%	58% - 68%	66% - 78%

Comments 1(c) and 2(b) relate to shared space scheduling.

The final shared space schedule will be decided upon by the Building Council if this proposed co-location is approved by the PEP.

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

Comment 1(d) alleges that students are not allowed to use certain spaces in co-located buildings.

² The FSF Guide is available at: http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy13_14/FY14_PDF/sam01_1c.pdf

³ The FY14 School Allocation Memoranda is available at: http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy13_14/FY14_PDF/sam21.pdf

In many buildings where schools are co-located, the Building Council determines that each school be assigned certain spaces on the floors or hallways of their classrooms and specific stairways for students to use. These measures are taken to cultivate cohesive cultures within each school. Separation between schools is intended to limit any issues that might arise from groups of students who may not know each other well and to nurture school unity. The intention is not to be punitive to any one group of students. If the assignment of specific common spaces is not working or is inadequate, the Building Council can discuss an alternative arrangement.

Changes Made to the Proposal

No changes have been made to this proposal.