Department of Education
Dennis M. Walcott, Chancellor

# Public Comment Analysis[1]

Date: October 7, 2013

Topic: The Proposed Co-location of New District High School 01M203 with Existing School University Neighborhood High School (01M448) in Building M446 Beginning in 2014-2015

Date of Panel Vote: October 15, 2013

## Summary of Proposal

The New York City Department of Education ("DOE") is proposing to co-locate 01M203, a new district Career and Technical Education ("CTE") /early college high school, in school building M446 ("M446") located at 200 Monroe Street, Manhattan, NY 10002, within the geographical confines of Community School District 1 ("District 1"). CTE programs integrate academic study with workforce skills in specific career clusters. Students receive instruction in an industry-related area and have the opportunity to graduate high school with industry-specific competencies and skills that lead to postsecondary education, further industry training and/or entry into the workforce. The early college program is designed to give students the opportunity to earn an associate's degree free of charge, and to put them on a postsecondary pathway potentially leading to career-track employment within the advertising industry. The proposed new high school, 01M203, will offer CTE programming in advertising with a focus on business and media, as described in more detail below, as well as early college programming. If this proposal is approved, 01M203 will be co-located in building M446 with University Neighborhood High School (01M448, "UNHS"), an existing district high school serving students in grades nine through twelve. M446 also houses a community-based organization ("CBO"), Grand Street Settlement. The proposed co-location of 01M203 is not expected to impact the current or future student enrollment, admissions policies or instructional programming at UNHS.

If this proposal to open and co-locate 01M203 in M446 is approved, students will have access to a new educational option in Manhattan. Through a six year program, students will have the opportunity to earn a CTE-endorsed Regents diploma, associate's degree, and industry-recognized credentials. Students will also engage in a progressive sequence of work-based learning experiences informed by industry partners. Students at CTE/early college programs can graduate high school in four years or less, or can choose to remain enrolled at the school for grades thirteen and fourteen in order to earn an associate's degree.

[1]The DOE will continue to accept comments concerning this proposal up to 24 hours prior to the Panel for Educational Policy's ("PEP") vote on October 15, 2013. Any additional comments will be addressed in an amended Public Comment Analysis which will be made available to the PEP before it votes on this proposal.

CTE/early college programs provide students with a career-focused educational experience that prepares them for career-track employment within their field of study. Each CTE/early college high school program is developed and administered in close collaboration with the college that awards the associate's degree and a high-profile employer that can offer first-in-line hiring consideration for qualified students who complete the early college program.

01M203 will be a CTE/early college school with a focus on careers in the advertising industry, partnered with the American Association of Advertising Agencies ("4A's"), and the Borough of Manhattan Community College ("BMCC"). BMCC is one of twenty-three colleges within The City University of New York ("CUNY"), sharing CUNY's mission to preserve academic excellence and extend higher educational opportunities to a diversified urban population. BMCC is dedicated to providing general, liberal arts, career education and continuing education programs, relevant to the needs, interests and aspirations of students of all ages. 01M203 will partner with 4A's, a national trade association representing the advertising agency business in the United States whose members produce 80 percent of total domestic advertising volume. Studying marketing and design inside the classroom, students will have the opportunity to intern in areas such as advertising, media management, and creative technology at 4A's member agencies outside of school.

01M203 students will have the opportunity to complete an associate's degree at BMCC at no cost to themselves or their families. 01M203 students will also have the opportunity to begin earning college credit in ninth through twelfth grade. In addition to the 4A's, 01M203 will build a network of strategic partnerships to offer opportunities related to its industry focus to its students. The partnerships supporting 01M203 will facilitate access to career opportunities with some of New York City's most successful companies.

Students enrolled in grades thirteen and fourteen will primarily be completing internships and taking off-site classes. Those students will likely not be in the M446 building full-time.

The proposed co-location of 01M203 in building M446 is part of the DOE's central goal to create new school options that will better serve future students and the community at large and to provide another option in the M446 building. UNHS is currently the only school in M446.

UNHS is a high school serving students in ninth through twelfth grades. UNHS enrolls students in two programs for the 2013-2014 school year: a bilingual Mandarin program, which admits students through a language-screened admissions method; and the University Neighborhood High School program, which admits students through an educational option admissions method. According to the High School Directory, in 2014-2015, UNHS is expected to enroll students in a new program, the University Neighborhood Early College program, which will admit students through a screened admissions method. The University Neighborhood Early College program is a new program that is not expected to increase the future total enrollment of UNHS, because available seats for the early college program will be offset by an equal reduction in the available seats for the University Neighborhood High School program. Neither program is expected to be impacted by this proposal, and total enrollment of UNHS is not expected to change due to this proposal.

If this proposal is approved, 01M203 will open in September 2014 in building M446, where it will be co-located with UNHS. 01M203 will be open to students through the Citywide High School Admissions Process and will have a limited unscreened admissions method, with priority for students residing in Manhattan. In 2014-2015, 01M203 will enroll approximately 75-85 students in the ninth grade. 01M203 will gradually phase in by adding one grade per year. The

school is expected to reach full scale in 2019-2020, when it will serve approximately 450-510 students in grades nine through fourteen. Again, this enrollment figure is likely overstated. The DOE anticipates that students working to earn their associate's degree during the early college program will also be able to earn additional industry-recognized certifications.

M446 has been identified as an under-utilized building. M446 has a target capacity to serve 694 students. During the 2013-2014 school year the building serves a total of approximately 275 students, yielding a building utilization rate of approximately 40%. If this proposal is approved, there will be sufficient space to accommodate UNHS and 01M203.

In 2019-2020, once 01M203 has fully phased in, there will be approximately 705-805 students served in the building, yielding a building utilization rate of approximately 102%-116% using the DOE's standard calculations. However, this standard rate is likely overstated because it includes 150-170 students in grades thirteen and fourteen. As noted above, these students will primarily complete their studies at off-site locations and will only occasionally be in the M446 building. Regardless, because the use of the building by students in grades thirteen and fourteen cannot be fully estimated at this time, the utilization rates conservatively treat those students like all other students in the school. This utilization estimate also overestimates enrollment and utilization in that it presumes that all incoming ninth-grade students will exercise their option to enroll in grades thirteen and fourteen. Therefore, the DOE expects that utilization in the fifth and sixth years of this proposal will be on the lower end of all projected ranges.

The DOE supports parent choice and strives to ensure that all families have access to high-quality schools that meet their children's needs. CTE programs empower students to complete high school and advance to higher education and career-track employment. The DOE strongly believes in the importance of CTE education and supports the opening of a new high school in the M446 building which will offer CTE programming in advertising. The DOE has been eager to bring new CTE opportunities to M446 to serve the City's families and connect students with an early college educational option that will give students the opportunity to earn an associate's degree free of charge; the co-location of 01M203 will help meet this goal.

## Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding the proposal was held at building M446 on October 7, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 95 members of the public attended the hearing, and 23 people spoke. Present at the meeting were Anthony Lodico, superintendent of Manhattan high schools; Lisa Donlan, president of Community Education Council for District 1 ("CEC 1"); Elizabeth Collins, principal of UNHS and member of the school's leadership team; Katherine Soverall, member of the UNHS school leadership team; Stanley Ng, Manhattan representative on the Citywide Council of High Schools; Council Member Margaret Chin; and Jennifer Peng of the DOE's Office of Portfolio Management.

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

1. Katherine Soverall, member of the UNHS SLT, asserted the following:
    a. UNHS has improved on its Progress Report, Learning Survey, and multiple measures of student learning. The College Now program has helped UNHS students earn in excess of 100 college credits.

b. UNHS does not need another school that also would offer college credits to be co-located in the building. There are multiple courses at the new school that are very similar to those offered by UNHS.
c. The building is labeled as under-utilized but those rooms are currently used for resource and pull-out.
d. The DOE should come in to upgrade our facilities and to expand the programs that are succeeding. The DOE can give no guarantee that the culture, climate, and student progress will not be negatively impacted by the co-location. Much of the language in the EIS is conditional.
e. The enrollment for UNHS is slated to decrease and the proposed school is going to grow. This is an indication that the intent of this proposal is to phase out UNHS and give the whole building to the new school.

2. Council Member Chin asserted the following:[2]
    a. During the summer, parents and students at UNHS rallied against this proposal.
    b. There is no room in this building for another school.
    c. She has heard from the DOE that the capacity of the building is for 700 students and that not all students will be in this building full-time.
    d. This building is over 100 years old. She has helped create a library in the building and that library should be used as a library, not as anything else.
    e. The City Council has supported UNHS, which has no gym, no auditorium, and no cafeteria.
    f. The school is doing well and is doing better. She remembers some years ago that UNHS was on the danger list of closing and the school fought back. The school is doing well now and they want the school to continue to do well.
    g. The DOE should site this school in the Murry Bergtraum building. That building has the room and is closer.
    h. This proposed new school is supposed to work with BMCC. This school building is very far from BMCC. The M22 bus is the only public transportation available and does not run often.
    i. The space that UNHS has in the building is used to serve students with disabilities or English Language Learners.
    j. She would like UNHS to grow to be more than 300 students.
    k. She wants UNHS to succeed and asks that the PEP reconsiders this proposal.
    l. The DOE should put the new school's funding into the facilities at UNHS.
    m. UNHS teachers and the principal are committed to the students here.

3. The UNHS SLT student representative asserted the following:
    a. The proposed co-location would not fit because the building is too small. It is unsafe, unsanitary, and unfair for both schools.
    b. Last year, he was a student during the Millennium co-location during Hurricane Sandy. Many people said that that co-location was a disaster.
    c. There are limited staircases, narrow hallways, and not enough space in case there is another school and an emergency happens.
    d. It would be unfair to put the new school in this building because the new school could grow in its own building.
    e. These are very different facilities: there are 4 student toilets, one set on the first floor and one set on the fifth floor.

[2] Council Member Chin also sent a letter to the DOE, received on August 29, 2013. Points made in the letter that were not stated at the hearing are summarized in comment 11 of this Public Comment Analysis.

f. Safety is a concern: there would be too many people trying to go through the four exits of the school. What happens when all students want to come in at the same time?

4. Lisa Donlan, president of CEC 1, asserted the following:
    a. She asked the audience if anyone from 4A's, BMCC, or the new CTE school was in attendance at the hearing.
    b. The community never hears what the educational impact will be. The statement is only that there won't be any impact, there will be plenty of room, and the schools will figure it out.
    c. She wants both of these schools to thrive and has asked that the DOE show the schools at capacity. Their response has been that the principals will be forced to compete and not collaborate.
    d. This is not a good way to set up a co-location and not a way to set up a fair environment for students.
    e. District 1 was an early adopter of co-location and the right way is for everyone to be at the table from the beginning and to do it thoughtfully with mechanisms for correction along the way.
    f. She submits to the record the United Federation of Teachers' ("UFT") report where they walked through the M446 facilities.[3]
    g. M446 was built as an elementary school. There are inadequate staff and student bathrooms, issues about fire resistance and alarms, and the hallways and stairs are insufficient in size for emergency egress.
    h. There is no gym and students play basketball in the lobby, which is not good for one school, much less two schools.
    i. There is only one science lab.
    j. When this cafeteria is having its lunch sessions, the play area can't have gym. It will be difficult to program these spaces.
    k. This building is not accessible and there is not enough electricity to run air conditioning in all of the rooms. The basement often floods.
    l. Adding another school into this building will not be good for UNHS.
    m. This proposal will pass but in January, there will be a new mayor and a new administration with a new philosophy for education.

5. Multiple commenters who are students at UNHS asserted the following:
    a. The building is too small for the students at UNHS. Adding an extra school will not benefit us.
    b. When we have emergency drills or emergencies, how would students get out in time? Students will not be able to get out of the building on time due to this proposal.
    c. The school would not have enough security to protect UNHS students from chaos if more students were added to the building.
    d. Future students and the current ninth through eleventh grade students at UNHS would have a different experience than the seniors at UNHS.
    e. UNHS students currently know one another very well, but they won't know the other students at all.
    f. When Millennium was here for Hurricane Sandy, we had to take all of our classes on certain floors and in the summer it was difficult to climb up to the

[3] The UFT report is summarized in comment 10 of this Public Comment Analysis. Responses to comment 10 will be the response to 4f.

fourth or fifth floor to go to class. The hallways were crowded, students were late to class, and it wasn't fair to UNHS students or staff that Millennium was in the building. Because of lack of space, there were arguments and fights because students didn't like to be touched or bumped.

g. Many students won't want to come to school if there's a new school in the building. They won't want to give all the effort that they give now because they don't want the extra hassle.
h. All of UNHS' classes are on the third floor, where the hallway is very thin and we can't get through.
i. Instead of putting in a new school, the DOE should put this money into UNHS.
j. Attending UNHS has changed several students for the better. Several students asserted that they chose to attend UNHS because there was only one school in the building.
k. Going to gym and going upstairs is very hot and there are not enough air conditioners to cool them down.
l. There will be less space for the special education students that need extra help.
m. On the top floors, the floor is unsafe and could crumble.

6. Multiple commenters who were teachers at UNHS asserted the following:
    a. UNHS uses the large number of full-size rooms in the building by having more teachers in a room. When one teacher is teaching the students, the other teacher will take some students out of the room for pull-out. The students benefit greatly from the space and they cannot benefit if they do not have the space.
    b. We have written grants for smaller class sizes for students.
    c. Grand Street Settlement and the program's full-time college advisors, After School Advantage, and GPS programs are very beneficial for students. UNHS' attendance has gone up dramatically due to these programs. Without the space, the programs will stop.
    d. UNHS is currently at 335 students on register and this is aligned with previous years' enrollment levels. UNHS' enrollment is projected to be at 255.
    e. Many students were late to class due to overcrowding in the hallways in years past, and it was the same when Millennium used the building during Hurricane Sandy.
    f. They are not comfortable in the building. The current schedule for lunch is for twelve tables of twelve students. How will the new school have lunch?
    g. There is limited storage space for both teachers and students. For example, they don't have lockers on the first floor, so where can students put their things safely?
    h. UNHS is a community and we all need to remember that students come first. UNHS was a failing school when he first started at UNHS. Now UNHS has improved on all measures for student progress.
    i. Judging by the projected enrollment, UNHS is being taken down.
    j. The CTE model of advertising and BMCC associate's degree proposed for this school is not helpful for students because those industries and degrees are not optimal.
    k. The DOE should give UNHS the early college program.
    l. Bathrooms and stairwells are all problematic.
    m. We should use the money from the new school to improve UNHS' facilities.

7. Multiple commenters who were or are parents of students at UNHS asserted the following:
    a. There is no auditorium and no gym and this should be considered.

b. If UNHS staff don't know the students at the other school, then how will the staff know who is and is not an intruder in the building?
c. Where will UNHS students have resource and pull-out?
d. This proposal would have UNHS students mixing with strangers.
e. UNHS has improved and the staff is focused on helping all of the students focus on graduating, some with Regents diplomas, and helping them attend college, not the military.
f. The parents were not given enough time to learn about the co-location and the time to support every student in UNHS.
g. The DOE should build another building for this school somewhere else.
h. The safety of students is a concern: will there be cameras?
i. How much will this new school cost? Is it cost effective to bring another school in this building?
j. It does not make sense to put another school into this building. Another school in this building will not allow for personalization and it will impact not just her son but future UNHS students.
k. This is a proposal to phase out UNHS.

**The DOE did not receive any comments through its feedback phone number.**

**The DOE received the following comments through its feedback email address.**

8. The founding principal of UNHS asserted that:
    a. In 2006, UNHS' administration agreed with the Office of High School Admissions that enrollment at UNHS would be capped at 500.
    b. Classrooms can accommodate a lower number of students and only one teacher.
    c. The building does not have an auditorium or a gymnasium. It has 2 lobbies – one for cafeteria and one for physical education.
    d. Hallways, bathrooms, and electricity are limited.
9. CEC 30 shared a resolution calling for a moratorium on all co-locations.
10. The DOE received a UFT co-location investigation of building M446 that asserted:
    a. The population of UNHS is well below the occupancy level that building M446 can accommodate. There are at least four classrooms on each floor that are not "properly utilized," full size classrooms not used for instruction.
    b. There are concerns about current bathroom facilities.
    c. There are sufficient stairs and hallways for the co-location but some are insufficiently sized for emergency egress. The construction may not be of fire-resistant construction. Fire alarm systems might be upgraded.
    d. The classrooms have windows for natural ventilation and there is one science lab.
    e. There is no exhaust system. There is no thermostat control. There is the need for an electrical upgrade.
11. Councilwoman Margaret Chin asserted the following:
    a. Classrooms are not full-size.
    b. There is one elevator that can fit 1 wheelchair at a time. Adding more students who require use of the elevator will be unsafe.

**The DOE received a number of comments which do not directly relate to the proposal. Those comments are summarized below.**

12. The computer lab is very small and not all of the computers work. It appears as though the students are not putting the work in. However, incomplete work is due to insufficient time to do the projects assigned and when students tell teachers that the work is

incomplete, it is because there is no time during school to do it and also because there's no computers to do it on.

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

Comment 10a is the UFT's confirmation of under-utilization at M446 and does not require a response.

Comments 2e, 4h, 4j-k, 5h, 5m, 6f, 6l, 7a, 7h, 8b-d, 10b, and 11a-b pertain to the facilities, shared spaces, and general condition of building M446.

The DOE believes that building M446 is compliant with the building code and is adequate for students to attend school in the building.

In response to comments 4k, 5k and 10d-e, School Construction Authority is completing an electrical systems project at building M446 that will increase electrical capacity and allow the school to install window air conditioning units. The electrical systems project is almost complete at the time of this document's posting. The building has roof top exhaust fans and thermostats that control heat in the building. If there are concerns or problems regarding the thermostat, the Division of School Facilities will work with the school to address.

Facilities upgrades to the building completed or ongoing include:

- Masonry projects to remove and replace deteriorated masonry
- Flood elimination in the basement
- Parapet work to replace stones and ensure that parapet height met current building codes for minimum height
- Replacement of the main roof, elevator vestibule roof, and bulkheads
- Staircase delamination for staircases A and B
- Library projects
- IP surveillance camera installation
- Classroom connectivity

In response to comment 10c, M446 has no violations regarding the building being made of non-fireproof material. The fire alarm system will be upgraded and the project is currently in design.

In regards to the toilets, the toilet facilities in M446 exist on each floor of the building in such a way that the two schools in M446 could split and share appropriately. In many buildings where schools are co-located, each school is assigned bathrooms 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 bathrooms is not working or is inadequate, the Building Council may discuss alternative arrangements. With respect to the lack of a gym, M446 has three physical education spaces for students: a play area, fitness room, and dance studio. The width of the hallways varies in the building and will, as with all co-located schools, have to be taken into account by the Building Council in considering how stairways can be used to manage student traffic. Bell schedules of co-located schools may be staggered so that transitions are not happening simultaneously for co-located schools.

The specific shared space schedule will be agreed on by the Building Council if the PEP approves this proposal. As per the Campus Policy Memo 2011, co-located schools on campuses must actively participate in a Building Council, which is a campus structure for administrative decision-making for issues impacting all schools in the building. The Building Council meets at least once a month to discuss and resolve issues related to the smooth daily operation of all schools in the building and the safety of the students they serve. The Building Council principals, where applicable, communicate their decisions campus-wide to staff, students and parents, especially for issues of safety, shared space, campus schedules, split-staff agreements and extended facility use. If conflicts emerge and progress is impaired, the Building Council will follow the dispute resolution procedures outlined in the Campus Policy Memo available at the following link: http://schools.nyc.gov/community/campusgov/KeyDocuments/CampusMemo.

As mentioned above, while M446 does not have a gymnasium, there are three physical education spaces in the building: a lobby for physical education, a fitness room, and a movement studio. If this proposal is approved, students at both schools would be able to receive physical education instruction in those spaces. The building also has one science lab and two science demonstration rooms on the top floor. Again, students at both schools enrolled in lab work can be accommodated in the lab and demonstration rooms.

With respect to the cafeteria, and hallways/stairwells, many Building Councils Citywide use staggered instructional times to effectively program student transitions and instructional periods. There are examples of buildings Citywide that use stairwells to draw off traffic from hallways and streamline transitions. Given that there are 3 stairwells in the building, the Building Council may assign one stairwell to each school and keep one stairwell shared in order to facilitate student travel between the floors. This is a decision ultimately left up to the Building Council if this proposal is approved.

The DOE anticipates that both school organizations will work collaboratively in order to ensure the safety of all students, and will work together to create a supportive learning environment for all students served in the M446 building.

Comment 2d concerns the preservation of the library. Comment 6c concerns the continuation of programs affiliated with UNHS that are currently sited in M446.

This proposal is not expected to impact the siting of the Grand Street Settlement in the M446 building. Furthermore, space is reserved for Grand Street Settlement in the EIS. This proposal is also not expected to impact the library at UNHS. Space is reserved for the library in the EIS.

Extra-curricular activities that are held in classroom spaces are not reduced due to this proposal. The allocation of space for high schools requires schools to program their space for maximum efficiency. Thus, schools are expected to use their rooms for other subjects if time is available after all classes are scheduled.

Comments 1e, 6i, and 7k suggest that this proposal is to close UNHS.

As stated in the EIS, this proposal is for the co-location of a new district early college/CTE school. This proposal will not close or phase-out UNHS. The enrollment at UNHS is expected to remain stable and is not projected by the DOE to drop below its 2013-2014 range.

Comments 1a, 1b, 2f, 2j, 2m, 5j, 6h, and 7e describe personal stories of success from students,

families, and teachers, and described the supportive and familial environment at UNHS. Many of the same commenters stated that they felt that it would be difficult for UNHS to continue providing such experiences to students if the co-location proposal were approved.

The DOE commends the accomplishments of the students and staff at UNHS and does not anticipate that the co-location will impact the ability of UNHS to offer a wide range of programs and support the needs of all students.

Co-locations of schools in DOE buildings have not demonstrably led to a decline in achievement at other co-located school organizations.

As described in the EIS, there is sufficient space in the building to support the proposed co-location, and this proposal is not expected to impact future student enrollment, instructional programming, or the admissions process for UNHS.

Comments 3d and 7g suggest that the new school should open in a new building.
The DOE partners with the School Construction Authority ("SCA") to provide new construction and renovation projects across all of New York City's public schools. Part of SCA's work includes evaluating and projecting future needs for new capacity and identifying suitable construction sites where necessary, particularly given the space constraints of New York City. However, building M446 is under-utilized and could be used more efficiently to serve additional students. Therefore, the DOE has proposed to co-locate a new district early college/CTE school in M446 and create more educational options without requiring new construction.

Unfortunately, the DOE does not have the space and funds to construct a new building for every new school. Co-location is therefore very common in New York City schools – of all district schools, approximately two-thirds are co-located with another school, most with another district school – as there are not sufficient school buildings to allow each school organization to operate its own building. Although the DOE recognizes that people in the community may have strong feelings against this proposal, the DOE is confident that the principals in M446 will be able to create a collaborative and mutually respectful environment for all students, staff, and faculty members in the building if this proposal is approved.

Comment 7i asks about the cost of co-locations, Fair Student Funding (FSF) dollars – approximately $5.0 billion in the 2012-2013 school year based on projected registers – are used by all district schools to cover basic instructional needs and are allocated to each school based on the number and need-level of students enrolled at that school. All money allocated through FSF can be used at the principals' discretion, such as hiring staff, purchasing supplies and materials, or implementing instructional programs. As the total number of students enrolled changes, the overall budget will increase or decrease accordingly, allowing the school to meet the instructional needs of its student population. In addition to the FSF student-need based dollars a school receives, all schools receive a fixed lump sum of $225,000 in FSF foundation and $50,000 in Children First Network Support to cover administrative costs.

New schools receive Fair Student Funding in the same manner as other schools. Funding follows the students and is based on pupil academic needs (i.e., special education, ELL, poverty, and/or proficiency status).

New district schools are provided with additional funds to cover start-up costs such as supplies and textbooks that may be required. This Other than Personal Services (OTPS) for new schools funding allocation is based on a fixed per-school amount, and a per-pupil allocation. A new

school in year one of implementation at a newly constructed site will receive $22,000 and a new school in a newly leased or existing site will receive $51,000 in OTPS per school. Thereafter, the school will receive $100 per-student in OTPS based on projected registers for the newly added grade. In the case where there is no new grade phasing-in, the school will not receive an allocation in that year.

Comments 1d, 2l, 5i, 6k, and 6m suggest that resources or supports should be provided to UNHS with the resources and money that would otherwise go to the new school, that UNHS should grow larger, or that the early college/CTE program should be given to UNHS rather than the new school.

UNHS is offered the following supports as part of the Children First Network:

- Working with the principal to develop strong leadership skills;
- Providing strategies for engaging students in rigorous assignments that will prepare them for success in future educational and professional pursuits;
- Working to improve classroom instruction by giving teachers feedback that is aimed at strengthening their practice and providing professional development aligned with the Common Core Standards;
- Recommending effective ways to organize the school;
- Providing operational support for budget, enrollment, facilities, transportation, and health, among other areas, to allow school leadership to maximize support for student learning;
- Helping the school to improve the learning environment and develop a culture that supports safety, respect, and socio-emotional development; and
- Supporting the school in developing and maintaining strong ties to the community.

Beginning an early college/CTE program requires that a school leader spend the majority of the school year before the program's start working with the industry and college partner to plan the CTE and industry programming (coursework, internships, college accreditation) in grades 9 through 14. This time requirement cannot be fulfilled by a sitting principal or assistant principal in an existing school such as UNHS.

Furthermore, a bigger school does not necessarily mean a better school. The DOE recognizes UNHS' improvement. The DOE has seen successes in many of its smaller high schools Citywide and does not anticipate that UNHS' enrollment will change significantly from its 2013-2014 school year level. There is no change in enrollment projected for UNHS because the new screened UNEC program, UNHS' educational option program, and the screened Mandarin program collectively add up to the same number of total ninth grade seats at UNHS.

A co-location does not preclude UNHS and M446 from receiving more supports, resources, and facilities upgrades. The DOE has seen many instances of co-located schools pooling resources to create programs or upgrades that one school could not sustain individually.

Comment 6j suggests that the early college/CTE programming of the proposed new school will not achieve the intended goals of college readiness and industry employment.

The proposed school's model is designed to be an option for students interested in early participation in the advertising industry and the opportunity to earn an associate's degree free of charge. The DOE believes that providing students with the opportunity to graduate from high school with industry-specific competencies and skills will lead to post-secondary education, further industry training and/or entry into the workforce.

Comment 6d concerns the current enrollment of UNHS and enrollment projections for UNHS.

The 335 figure asserted by the commenter is incorrect. Claims suggesting that the DOE is anticipating decreases to UNHS' enrollment or the closure of the school are also incorrect. As of October 11, 2013, UNHS' ATS register lists 308 students. This 308 figure also includes long-term absence students. Long Term Absences ("LTAs") refer to students who had been absent continuously for 30 days or more. It is appropriate to exclude LTAs from enrollment projections for space planning purposes because LTAs do not currently attend the school, and thus are not occupying "seats" in the building.

Comments 2b-c, 3a, 3c, 3e, 4g-i, 5a, 6b, 6g, 7j, and 8a assert that building M446 and its classrooms currently are and/or will be overcrowded as a result of the proposal.

Class size is primarily a function of student enrollment, and is affected by how principals allocate their resources. Principals have discretion over their budget and make choices about how to prioritize their resources. The DOE also notes that the number of class sections at each school is determined by the principal based on enrollment, budget, and student needs and there is a target class size based on the number of students in a class section for each grade level. Thus, the DOE does not expect that this proposal will cause increased class sizes at UNHS.

With respect to comments that assert that the building overall will be overcrowded, as stated in the EIS, M446 has the capacity to serve a total of 694 students based on the 2011-2012 target capacity. In 2013-2014, 275 students are being served in M446. This yields a utilization rate of 40%. If this proposal is approved, the new early college/CTE school will open in September 2014 serving approximately 75-85 students in grade nine. At scale, the new early college/CTE school will serve approximately 300-340 students in grades nine through twelve, and an additional 150-170 students in grades thirteen and fourteen, for a total of 450-510 students. The utilization rate for the final year of implementation is 102%-116%. That projected utilization rate is likely overstated, since the DOE cannot accurately predict the number of students who will continue into the early college program and those continuing students will likely not be in the building full-time.

With respect to concerns that M446 is already overcrowded, the DOE verified the amount of space available in the building through a walkthrough performed by the Manhattan Director of Space Planning, and did not rely upon the annual facilities survey to determine the number or availability of classrooms. The DOE believes that the walkthrough properly identified the available space in the building and is more reliable than the facilities survey for space planning purposes.

Comments 4l and 5d-g pertain to the social-emotional impact of this proposed co-location.

The DOE recognizes that co-location at a school may be a challenging experience for students, staff, and community members. UNHS will continue to receive support in the areas of budget, staffing, programming, community engagement, guidance, and enrollment including, but not limited to:

- Helping the school provide students with options that support their advancement and fully prepare students for their next transition point.
- Working with school staff to foster a positive culture.
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

Although the DOE recognizes that people in the community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities at M446 will be able to foster a collaborative and mutually respectful environment for all students, staff, and faculty members in the building.

These comments also suggest that there will an overall negative impact on UNHS students. While the co-location will reduce the amount of excess space which is currently available to UNHS, as stated in the EIS, the co-location is not expected to impact instructional programming, extra-curricular offerings or partnerships at the school. UNHS will continue to receive its adjusted baseline Footprint allocation of rooms throughout the course of the phase-in of the early college/CTE school. Both UNHS and the early college/CTE school will offer programming based on student interests, available resources, and staff support for those programs. Students will continue to have the opportunity to participate in a variety of extra-curricular programs, though the specific programs offered at a given schools are always subject to change. All students enrolled in UNHS will continue to receive appropriate ELL and IEP services if this proposal is approved. With respect to academics, UNHS will continue to offer all necessary classes to support current and future students as they work to meet promotional requirements.

Comments 5c and 7d assert that this proposal would result in unfair or unsafe conditions if the early college/CTE school students do not follow the rules of the building or would negatively impact the culture of M446.

The leadership of all co-located schools work together under the Building Council to work through routines and safety procedures for the building. Pursuant to Chancellor's Regulation A-414, every building with co-located schools must have a School Safety Committee. The committee plays an essential role in the establishment of safety procedures, the communication of expectations and responsibilities of students and staff, and the design of prevention and intervention strategies and programs specific to the needs of the school. The committee is comprised of various members of the school community, including Principal(s); designees of all other programs operating within the building; United Federations of Teachers Chapter Leader; Custodial Engineer/designee; and In-house School Safety Agent Level III, among others. The committee is responsible for addressing safety matters on an ongoing basis and making appropriate recommendations to the Principal(s) when it identifies the need for additional security measures, intervention, training, etc. The Committee is also responsible for developing a comprehensive School Safety Plan which defines the normal operations of the site and what procedures are in place in the event of an emergency. The plan must be consistent with the Citywide prescribed safety plan shell. Each program operating within a school must enter program-specific information in the School Safety Plan. The School Safety Plan is updated annually by the School Safety Committee in order to meet changing security needs, changes in organization and building conditions, and other factors. In addition, the Committee recommends changes in the School Safety Plan at any other time when it is necessary to address security concerns.

To the extent that parents and students are worried that this co-location proposal will affect the culture of UNHS, the DOE notes that parents and students may actively take a role in ensuring that does not happen. For example, parents can become involved in their Parent/Parent-Teacher Association (PA-PTA). Parents may work with school administrators to ease the transition and assist with outreach in the community regarding the proposal. Students at both schools may collaborate during clubs or neighborhood community service events.

Comments 3f, 4g, 5b, and 10c assert that there are specific safety concerns around entry and exit, especially with respect to drills or evacuations.

Every school has a fire safety plan which includes plans for fire drills and evacuations in case of emergencies. All schools work with the Office of Safety and Youth Development to address any concerns or modify the fire safety plan as needed. Additionally, the School Safety Committee, described in detail above, is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. The School Safety Plan is updated annually by the Committee to meet the changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the principals when it identifies the need for additional security measures. Finally, several buildings in the city that are co-located with both district and/or charter schools have to make similar plans for fire safety in the face of stairwells, and other building configuration issues. The final decision on how to appropriately plan for these situations resides with the Building Council.

Comment 7b suggests that the co-location could allow intruders to enter M446. The building's sign-in procedures with school safety agents at the doors will continue, if this proposal is approved.

Consistent with the process described above, the leaders/designees of UNHS and the new early college/CTE school will be part of the M446 School Safety Committee. They will participate in the development of the building's School Safety Plan and ensure that any security-related issues or needs that may arise with respect to the co-location of
UNHS and the early college/CTE school will be addressed on an ongoing basis.
Moreover, the School Safety Plan for the M446 school building will be modified as appropriate to meet any changing security needs associated with the co-location. The leaders/designees of UNHS and the early college/CTE school will enter information in the M446 schools' overall School Safety Plan to ensure the safe operation of the school building. Each school building must also establish a Building Response Team that will consist of trained staff members from each school in the building, which is activated when emergencies or large building-wide events occur. The members of this team must be identified and listed in the School Safety Plan.

The completed School Safety Plan for the M446 school building will be submitted to the Borough Safety Directors of the Office of School and Youth Development for approval. If changes or modifications are necessary, the School Safety Committee will be advised. Once the School Safety Plan is approved, it will be submitted to the New York City Police Department ("NYPD") for final approval and certification by the NYPD.

Comments 4a-e and 7f express dissatisfaction or opposition to the A-190 siting process.

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 (e.g., grade reconfigurations, re-sitings, co-location of schools, or phase-outs), including this proposal to co-locate a new early college/CTE high school in M446.

The DOE has made a concerted effort to gather and share information and feedback with the

UNHS school community. Prior to the proposal posting, the DOE met with UNHS Principal Elizabeth Collins. The DOE presented at a UNHS SLT meeting and a public CEC meeting to discuss this proposal and gather feedback. The EIS and appropriate translations were made available to the staff, faculty and parents at UNHS and were also posted on the DOE's Web site.

Also included in this process is a joint public hearing in which public comment is collected and analyzed. The DOE also solicits community feedback via phone, email, and the DOE Web site until 24 hours prior to the PEP vote. Those comments and analysis are then made available to the Panel for Educational Policy before the Panel votes on a proposal.

While the DOE supports the proposal to open and co-locate a new early college/CTE school in M446, the DOE notes that no decision has been made on this proposal. Any proposed change to school utilization must be approved by the PEP.

Comments 2a, 2k, and 9 state general opposition to the proposal. While some members of the UNHS community object to the possibility of co-locating the early college/CTE school, the DOE is committed to providing a portfolio of high quality school options to students and families. The DOE strives to ensure that all students in New York City have access to a high-quality school in an appropriate environment at every stage of their education. This proposal aims to provide a new educational option in the M446 building. The DOE believes that this proposal will not impact the ability of UNHS to continue providing educational opportunities for current and future students and will provide new opportunities for the early college/CTE program to serve as early college advertising option for high school students in the New York Public School system.

Comments 1c, 2i, 5l, 6a, and 7c assert that the proposed co-location would result in too few resource or pull-out rooms for UNHS students if this proposal is approved.
There are currently hundreds of schools in buildings across the City that are co-located. In all cases, allocation of classroom, resource, and administrative space is guided by the Citywide Instructional Footprint ("The Footprint") which is applied to all schools in the building. The DOE seeks to fully utilize all its building capacity to serve students. The Footprint is the guide used to allocate space to all schools based on the number of class sections the school programs and the grade levels of the school.

The Footprint allocates the number of baseline rooms for student support services, resource rooms, and administrative space based on the grades a school serves and its enrollment at scale.

With respect to concerns that the co-location will impact UNHS' ability to provide individualized instruction and other types of special education services, all schools in the M446 building will continue to be allocated enough space to meet their instructional needs as identified by the Instructional Footprint. Furthermore, the EIS provides that students with disabilities will continue to receive mandated services in accordance with their Individualized Education Programs ("IEPs"). All students enrolled in UNHS will continue to receive appropriate ELL and IEP services if this proposal is approved. With respect to academics, UNHS will continue to offer all necessary classes to support current and future students as they work to meet promotional requirements. With respect to specific rooms designated for pull-out or resource, resource rooms are included as part of a school's Footprint. The assignment of specific rooms and location for each in the building, including those for use in serving students with IEPs or special education needs, will be made in consultation with the Principals of each school and the Office of Space Planning if the proposal is approved. The Director of Space Planning for Manhattan has already visited building M446 and will work with all organizations in M446 to ensure that each school receives its allocation as per Footprint.

For schools serving grades six through twelve, the Footprint assumes that students move from class to class and that classrooms should be programmed at maximum efficiency. The Footprint allocates one full-size classroom for each GE or ICT section and a full-size or half-size classroom to accommodate each SC section served by the school. The Footprint does not require that every teacher have his or her own designated classroom. Principals are asked to program their schools efficiently so that classrooms can be used for multiple purposes throughout the course of the school day.

Comments 2g-h suggest that this proposed school be moved to another specific building in District 2.

The DOE closely monitors the need to create additional elementary, middle and high school seats across the city and believes that this proposal will meet a need in District 1 and the Lower East Side: additional potential high-quality high school seats with an industry and college track. The DOE, as it has done, will continue to work towards diversifying its portfolio of seats in Manhattan and all boroughs.

Comments 3b, 5f, and 6e claim that this proposed co-location is connected or will be similar to the emergency re-siting and co-location of students from Millennium High School in M446 due to the effects of Hurricane Sandy on Millennium's instructional spaces during the 2012-2013 school year.

The DOE notes that the Millennium emergency co-location is significantly different from this proposed co-location. In the aftermath of Hurricane Sandy, hundreds of schools, and tens of thousands of students and families throughout New York City required immediate assistance and provisional structures for student instruction. The emergency co-location of Millennium's students in M446 was a response to a natural disaster and the implementation occurred over a very brief span of time: several days. The differences between the Millennium emergency co-location and this proposal are three-fold: planning, phase-in, and culture. This proposal allows for 10 months of collaboration between UNHS and the new school before students return to the M446 building for the 2014-2015 school year, whereas the Millennium re-siting had to occur over the course of several days in the third month of the school year. This proposal is for a gradual phase-in of the proposed school, such that over the next several years, the two schools can implement transitional shared space scheduling, space allocations, and school collaborations. Millennium's co-location was immediate and given the nature of Hurricane Sandy, did not allow for a gradual phase-in. This proposal is for a new school. The identity and structures of this early college/CTE school will be defined by this proposed co-location to be aligned with those of UNHS.

Comments 4m and 12 are unrelated to this proposal and do not require a response.

## Changes Made to the Proposal

No changes have been made to this proposal.