



Public Comment Analysis¹

Date: October 8, 2013
Topic: The Proposed Opening and Co-location of a New District Middle School (04M204) with Existing School P.S. 96 Joseph Lanzetta (04M096) in Building M096 Beginning in the 2014-2015 School Year
Date of Panel Vote: October 15, 2013

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to open and co-locate a new district middle school (“04M204”) in building M096 (“M096”) located at 216 East 120th Street, Manhattan, NY 10035, in Community School District 4 (“District 4”). If this proposal is approved, 04M204 will be co-located in building M096 with P.S. 96 Joseph Lanzetta (04M096, “P.S. 96”), an existing zoned elementary and middle school that currently serves kindergarten through eighth grade students. P.S. 96 also offers two sections of a full-day pre-kindergarten program and is expected to continue to offer pre-kindergarten, subject to demand and funding availability.

P.S. 96 is the only school organization currently in building M096.

If this proposal is approved, 04M204 will open in M096 in September 2014 and will admit students through the District 4 Middle School Choice Process using a limited unscreened admissions method. 04M204 will begin enrolling sixth-grade students in 2014-2015 and will add one grade level per year until it reaches full scale and serves students in grades six through eight in 2016-2017.

According to the 2011-2012 Enrollment, Capacity, Utilization Report (“Blue Book”), M096 has a target capacity to serve 730 students. In 2013-2014 the building is expected to serve approximately 472 students, yielding a building utilization rate of 65%. This means that the building is “underutilized.”

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.

In 2016-2017, once 04M204 has reached full scale, it is projected that there will be approximately 636 – 756 students served in M096, yielding a building utilization rate of approximately 87% - 104%.

The DOE supports the co-location of 04M204 in M096. This proposal is intended to increase the number of middle school options in District 4.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding the original proposal was held at building M096 on October 8, 2013. At that hearing, interested parties had an opportunity to provide input on the original proposal. Approximately 21 members of the public attended the hearing, and 7 people spoke. Present at the meeting were District 4 Superintendent Alexandra Estrella; District 4 Community Education Council (“CEC 4”) Member Elender Foxe; Betty Lugo, principal of P.S. 96, representing the P.S. 96 School Leadership Team (“SLT”); and Jennifer Peng from the Division of Portfolio Planning.

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

1. Elender Foxe, member of CEC 4, asserted the CEC’s support for all families currently at P.S. 96 and noted the CEC continues to accept feedback. She hopes the co-located schools would work together to serve all students.
2. Betty Lugo, principal of P.S. 96, asserted the following:
 - a. Despite the efforts of students, faculty and parents to increase enrollment at the school and bring in new programs, they have not been able to fill the building to capacity, but every room in the building serves an important purpose.
 - b. Sharing spaces with older students is challenging, and it is inevitable the older students will have to share bathrooms with the younger students.
 - c. Having a new middle school in the building will make it more difficult to cultivate a positive social-emotional environment for P.S 96 students.
 - d. Because the new middle school is proposed to admit students through a limited unscreened admissions method, any type of student could come into the building.
 - e. P.S. 96’s art program is funded by a grant that stipulates the program must have its own room. That grant could be jeopardized because the new middle school will take away space from P.S. 96.
 - f. The co-location could negatively impact the quality of education at P.S. 96 and may cause safety issues.
3. One commenter asserted the following:
 - a. As more families in the neighborhood want to attend P.S. 96, there may not be enough seats in the school for neighborhood families.
 - b. Overcrowding is a concern, as is sharing the computer lab, outdoor resource space and other shared spaces with middle school students.
 - c. Community-based organizations that operate in the building may be jeopardized.
4. Multiple commenters expressed concern about the ability of the cafeteria to accommodate two schools for lunch at reasonable times.

5. Multiple commenters stated that problems may arise around the bathrooms, which they believed could be difficult to share with middle school students.
6. One commenter echoed Principal Lugo's concern about the co-location of a middle school jeopardizing P.S. 96's art program.
7. One commenter made the following comments:
 - a. She stated a concern that the new school would get pushed out and have to move to another building.
 - b. She stated a concern that the building does not have adequate resources to support an additional organization.
8. One commenter asserted that her research indicateds children develop health problems from co-locations.
9. One commenter made the following comments:
 - a. A decision has already been made regarding the co-location of a middle school in M096.
 - b. New co-located schools generally do not foster communication or mutual respect with the existing school.
 - c. A new school would disrupt P.S. 96's routine.
 - d. Older students must be separated from the younger students.
10. One commenter stated that even though there may be space in the building, every room is being used and any reduction in space available to P.S. 96 would hurt the school's ability to serve students.
11. Multiple commenters expressed concerns about safety.

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

12. Multiple commenters expressed opposition to the proposal because P.S. 96 does not have the space.

The DOE received a comment which does not directly relate to the proposal. Those comments are summarized below.

13. One commenter asked why the DOE did not replace M.S. 45 with another middle school after it closed at the end of the 2012-2013 school year.

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

Comments 2(a), 2(e), 3(b), 6, 7(b), 10 and 12 express concerns about overcrowding and/or the loss of classroom space as a result of a co-location. 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. In all cases, allocation of classroom, resource, and administrative space is guided by the Citywide Instructional Footprint (the "Footprint") which is applied to to all schools in the building.

The DOE seeks to fully utilize all its building capacity to serve students. The DOE does not distinguish between students attending public charter schools and students attending DOE schools. In all cases, the DOE seeks to provide high quality education and allow parents/students to choose where to attend.

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 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. 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.

With regard to the specific concern about losing space for the art room, thus jeopardizing the grant that funds P.S. 96's art program, every elementary schools is allocated some number of "cluster" rooms to be used for art, music, dance, etc. P.S. 96 will continue to be allocated cluster rooms, one of which may continue to be designated as an art room.

Comments 2(b) and 5 express concern about students from different schools sharing bathrooms. 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. If the assignment of specific bathrooms is not working or is inadequate, the Building Council may discuss alternative arrangements. Additionally, there are many K-8 schools throughout the city in which students in elementary and middle school grades share the same bathrooms without issue.

Comments 2(c), 9(b) and 9(c) state concerns about the negative impact of a co-location in M096. As stated above, there are hundreds of schools throughout New York City are co-located with other schools. In fact, newly constructed buildings include space for District 75 students, meaning that new schools in new buildings are co-located. In many instances, co-located schools have been able to pool resources and share costs to support programs the individual schools would not be able to fund. The DOE has no reason to believe a co-location at M096 will impede learning at either P.S. 96 or the new middle school.

Comment 2(d) asserts that any type of student may come into the building as a result of this proposal because the proposed middle school would admit students through a limited unscreened admissions method. The DOE believes it is important to create options for all students. A limited unscreened admissions method will ensure that this new middle school is available as an option to every fifth grade student in District 4.

Comment 3(a) expresses a concern that a new middle school will cause P.S. 96 to turn away zoned students if demand for the school grows. P.S. 96's enrollment has declined steadily for the

past six years. Currently, less than 60% of the students attending P.S. 96 are zoned to the school. This suggests the school has ample capacity to enroll more zoned students should zoned demand reverse its trend and begin to rise.

Comment 3(c) concerns the community-based organizations that currently operate in M096. This proposal will not prevent those organizations from continuing to operate in M096. Outside organizations may continue to coordinate with P.S. 96 to push in to classrooms or to facilitate after-school programs.

Comment 4 expresses a concern about the ability of the cafeteria to accommodate two schools for lunch at reasonable times. The cafeteria in M096 has a capacity of 330 students, and with a new middle school at scale, the building will house 636-756 students. This means that lunch may be served over as few as two or three periods. As with other co-located buildings, the schools will work together through the building council to develop a shared space plan that meets the needs of students in both schools.

Comment 7(a) states a concern that the new school may be pushed out of M096 and into another building in the future. M096 is intended to be the long-term site for the new middle school.

Comment 8 asserts that research indicates children develop health problems from co-locations. The DOE knows of no such research and sees no health concerns posed by co-locations.

Comment 9(a) asserts that a decision has already been made regarding the co-location of a middle school in M096. No decision has yet been made concerning this proposal. The Panel for Educational Policy is the only body that can approve or reject this proposal. The Panel will vote on this proposal at their meeting on October 15, 2013.

Comment 9(d) asserts that older students must be kept separate from the younger students. In M096, the coexistence of middle school and elementary school students is nothing new, since P.S. 96 is a K-8 school. The intention of the K-8 model is to provide a continuous education to students as they progress into the middle school grades. Thus, at M096 in particular, elementary students should be accustomed to coexisting with older students. Additionally, there are hundreds of buildings across the city in which elementary students are co-located with middle school and high school students. In every co-located building, the Office of Space Planning works with schools to plan the building in a way that preserves contiguous space and observes boundaries like double doors. Some schools choose to stagger period changes and start- and end-times to further emphasize the schools' independence. These decisions will be made by the building council.

Comments 2 (f) and 11 concerns issues of safety should a new middle school join P.S. 96 in building M096. Pursuant to Chancellor's Regulation A-414, every school/campus is mandated to form a School Safety Committee, which 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 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 Principal(s) when it identifies the need for additional security measures.

Comment 13 does not relate to the proposal and does not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.