



Public Comment Analysis

Date: April 25, 2012
Topic: The Proposed Re-Siting and Co-location of One Grade of Osmond A. Church P.S./I.S 124 (27Q124) with Existing School Lyndon B. Johnson P.S. 223 (27Q223) in Building Q223 Beginning in the 2012-2013 School Year

Date of Panel Vote: April 26, 2012

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to re-site and co-locate the kindergarten cohort of Osmond A. Church (27Q124, “P.S./I.S. 124”), an existing K-8 school with Lyndon B. Johnson P.S. 223 (27Q223, “P.S. 223”), an existing K-5 school in Building Q223 (“Q223”), located at 125-20 Sutphin Boulevard, Jamaica, NY 11434, in Community School District 27 beginning in 2012-2013. 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.

P.S./I.S. 124 currently serves students in kindergarten through eighth grades in Building Q124 (“Q124”) located at 129-15 150th Street South Ozone Park, NY 11420. Q124 is approximately 1.8 miles from Q223. If this proposal to re-site and co-locate P.S./I.S. 124’s kindergarten with P.S. 223 is approved, incoming P.S./I.S. 124 kindergarten students will attend school in Q223 beginning in the 2012-2013 school year. The P.S./I.S. 124 students that would be co-located in Q223 would then articulate to the first grade in building Q124.

Q223 has the capacity to serve 994 students.¹ In 2011-2012, the building serves 723 students in kindergarten through 5th grade,² yielding a utilization rate of just 73%.³ Q124 has the capacity to serve 874 students. In 2011-2012, the building served 1,226 students, yielding a building utilization rate of 140%. Given these utilization percentages and the fact that space is a scarce resource, the DOE must use its existing public school buildings in the most efficient manner possible. The DOE must also work to ensure that students and families in every community have access to high-quality educational options. This proposal recognizes that a building that has excess space can be utilized more efficiently to serve students in the surrounding community.

¹ 2010-2011 Enrollment, Capacity, Utilization Report (“Blue Book.”).

² 2011-2012 Audited Register.

³ All references to building utilization rates in this document are based on target capacity data from the 2010-2011 Blue Book. Utilization rates referenced for the 2011-2012 school year is based on audited enrollment and do not include Long Term Absences (“LTAs”), students who have been absent continuously for 30 days or more as of October 31, 2011. This methodology is consistent with the manner in which the DOE conducts planning and calculates space allocations and funding for all schools. In determining the space allocation for co-located schools, the Office of Space Planning will conduct a detailed site survey and space analysis of the building to assess the amount of space available in the building.

If this proposal to re-site and co-locate P.S./I.S. 124's kindergarten cohort is approved, in 2012-2013 there would be approximately 811-871 students served in building Q223, yielding an estimated building utilization rate of 82-88%. At the same time, the utilization of building Q124 will be reduced from 140% to approximately 122% -131%.⁴

The details of this proposal have been released in an EIS which can be accessed here:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/April2012Proposals.htm>

Copies of the EIS are also available in the main offices of P.S./I.S. 124 and P.S. 223.

Summary of Comments Received at the Joint Public Hearings

There were two separate joint public hearings held at each of the impacted schools in Community School District 27 regarding this proposal. The first joint public hearing regarding this proposal was held in P.S./I.S. 124 on March 29, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Twenty members of the public attended the hearing, and two people spoke. Present at the meeting were Community School District 27 Superintendent Michelle Lloyd-Bey; District 27 Community Education Council ("CEC") President Coralanne Griffith-Hunt had confirmed attendance but could not attend due to unforeseen circumstances; P.S./I.S. 124 Principal Valerie Lewis; P.S. 223 Principal Deborah Otto; P.S./I.S. 124 School Leadership Team ("SLT") Members Debbie Capuano, Eileen Lamana, Mary Alarcon, Linda Malloy; P.S. 223 SLT members Elizabeth Smith, Shiva Harris, Claudia Patranin, Gloria Farley, Asanta Goldeen and Frances Sarno; and Emily Ades from the Department of Portfolio Management.

A second joint public hearing regarding this proposal was held in P.S. 223 on April 4, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 12 members of the public attended the hearing, and 5 people spoke. Present at the meeting were Community School District 27 Superintendent Michelle Lloyd-Bey; District 27 CEC President Coralanne Griffith-Hunt had confirmed attendance but could not attend due to unforeseen circumstances; P.S./I.S. 124 Principal Valerie Lewis; P.S. 223 Principal Deborah Otto; P.S./I.S. 124 SLT Members Debbie Capuano, Eileen Lamana, Mary Alarcon, Linda Malloy; P.S. 223 SLT members Ms. S. Boyle, Shelley Harrington, Stacey Williams, Sandra Wilkes-Duplain, Pat Dyer, Diane Thomas, Janis Roderick, and Ethel Williams; and Emily Ades from the Department of Portfolio Management.

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

1. Eileen Lamana, P.S./I.S. 124 PTA co-president, stated that she agreed with proposal. She said that as a kindergarten parent she feels assured that the P.S./I.S. 124 staff will oversee the annex and that the students will still be part of the school. She noted that she has the utmost trust in Principal Lewis' decisions.
2. A commenter had the following concerns:
 - a) The commenter inquired whether an EIS was made available to the public prior to the hearing.
 - b) The commenter was concerned that she was the only speaker at the hearing.
 - c) The commenter asked if other options had been explored prior to making the decision to propose bussing the kindergartners to an annex that is 1.8 miles away.
 - d) The commenter expressed concern that the kindergarten students would be attending a school that has a 73% attendance rate.

⁴ These percentages are contingent on the programming of the kindergarten sections, and are based on the total projected enrollment for all kindergarten sections. As discussed in Section III.A of the EIS, the possibility exists that one section of kindergarten students with Individualized Education Programs ("IEPs") will remain at Q124, if necessary to provide mandated services in accordance with the IEPs of incoming kindergarten students. If one section of kindergarten students remains at Q124, the enrollment of P.S. /I.S.124 for Q223 may be slightly lower than projected, and the enrollment of P.S./I.S. 124 for Q124 may be slightly higher than projected.

- e) The commenter noted that she pays taxes for her child to be able to attend P.S./I.S. 124 and objects to the proposal to move her child to another school.
3. A P.S. 223SLT member inquired as to why the pre-kindergarten of P.S. 223 was not included in the grade span listed in the EIS.
 4. A P.S. 223 SLT member asked for clarification on capacity of building Q124. She believes that Q124 is a larger building than Q223.
 5. A commenter asked if art programs would be provided to the kindergartners of P.S./I.S. 124. She also commented that parent volunteers are needed for the kindergarten annex.
 6. A commenter expressed concerns about the following:
 - a) How will lunch be provided for the kindergarten students from P.S./I.S. 124?
 - b) Will P.S. /I.S. 124 provide their own service providers and guidance for the kindergarten students that are annexed in Q223?
 - c) Will P.S./I.S. 124 provide their own office staff and administration for the kindergarten students that are annexed at Q223?
 7. A commenter asked the following:
 - a) Were options such as additional pre-kindergarten classes or Gifted and Talented classes at P.S.223 considered instead of a co-location in order to effectively use the under-utilized space in building Q223?
 - b) Will the co-location be reviewed annually and what will happen if the enrollment increases at P.S. 223 and the two schools can no longer be accommodated in building Q223?
 - c) Will additional school safety agents be provided for building Q223?

The DOE received no comments at the joint public hearings which did not directly relate to the proposal.

The DOE received no written comments and received one oral comment through its dedicated phone line and e-mail for this proposal:

8. A caller remarked that the unzoned students from the Astre Program need to move out of P.S./I.S. 124 to accommodate zoned students. The caller opposes the kindergarten annex because she has older children and does not want her children at different sites.

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

Comment 1 expressed support for the proposal and does not require a response.

Comment 2(a) inquired about the Educational Impact Statement associated with this proposal. As required by law, parents were notified by letter distributed by the schools via backpack during the week of February 28, 2012 about this proposal. This letter served as notice that an Educational Impact Statement (“EIS”) regarding this proposal was posted on the DOE’s website at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/April2012Proposals>, and that printed copies of the EIS were available in the main offices of P.S./I.S. 124 and P.S. 223.on the day of posting.

Comment 2(b) expressed concerns that there was only one comment made in opposition to the proposal. All community members had the opportunity to share feedback about this proposal at each of the joint public hearings held on March 29, 2012 and April 4, 2012, or by phone at 212-374-7621, or via e-mail at D27Proposals@schools.nyc.gov).

Comment 2(c) asked if other options were explored prior to proposing that the kindergarten cohort of P.S./I.S. 124 be co-located with P.S. 223 in building Q223. Other solutions to the over-crowding at P.S./I.S. 124 including capping and over-flowing students to other schools, or reducing the kindergarten enrollment at P.S./I.S. 124, were not as favorable as creating an annex for the kindergarten students. This is due to the fact that the students will still be attending kindergarten under the administration of P.S./I.S. 124 and will remain part of that school's community. Although the Q223 annex site is approximately 1.8 miles from the building, it is in Community School District 27.

Comment 1(d) expressed concern that the attendance rate at P.S. 223 is 73%. The attendance rate at P.S. 223 for 2010-2011 school year was 93.5%. Additionally, if this proposal is approved, the kindergarten students will still be enrolled at P.S./I.S. 124 and will be co-located with P.S. 223 in building Q223.

Comment 2(e) showed concern that her child would be moved to another school. If this proposal is approved, the kindergarten students will be still enrolled at P.S./I.S. 124 and will not be part of another school. If this proposal is approved, the kindergarten cohort of P.S./I.S. 124 will be co-located with P.S. 223 in building Q223 and would then articulate to the first grade in building Q124. Currently, the utilization rate of building Q124 is 140% and the utilization rate of building Q223 is just 73%. Building Q223 and building Q124 are in close proximity and are both located in the geographical and administrative confines of Community School District 27. Therefore, the DOE believes that a building with excess space can be utilized more efficiently to serve students in the surrounding community.

Comment 3 inquired why P.S. 223's pre-kindergarten was not included in the grade span for P.S. 223 stated in the EIS. Pre-kindergarten is not considered a grade; it is a program that can be offered either half-day or full-day and is subject to funding and demand. Currently, P.S. 223 has 34 pre-kindergarten students and the proposed co-location of one grade of P.S./I.S. 124 is not anticipated to impact this program.

Comment 4 pertained to the building capacity of Q124 versus the building capacity of Q223. As noted in the EIS, building Q223 has the capacity to serve 994 students and building Q124 has the capacity to serve 874 students. Therefore, Q223 does have a larger building capacity. Furthermore, although Q223 has a larger building capacity, Q124 currently serves more students. P.S./I.S. 124 currently serves 1,226 students in kindergarten through eighth grade yielding a utilization rate of 140%. P.S. 223 currently serves 723 students in kindergarten through fifth grade yielding a building utilization rate of 73%. As noted above in the response to comment 2(e), the excess space in building Q223 can be utilized more efficiently to serve students in the surrounding community and help alleviate some of the overcrowding in building Q124.

Comment 5 was a question regarding art programs for the P.S./I.S. 124 kindergarten students. The DOE does not anticipate that this proposal will impact the current program offerings at P.S./I.S. 124. P.S./I.S. 124 is a "Core Knowledge School", a curriculum that includes a visual arts component across all grade levels.

Comment 6(a) was a request for information about school lunch for the P.S. /I.S. 124 kindergarten students. 85% of the P.S./I.S. 124 students are eligible for free or reduced lunch. If this proposal is approved, those students who are eligible will continue to receive free lunch in building Q223. Additionally, the students will be monitored in the lunchroom by the staff of P.S./I.S. 124.

Comment 6(b) inquired about service providers and guidance for the kindergarten students that are annexed in Q223. In the event that a kindergarten student requires special services, the necessary service providers will be expected to travel from building Q124 to building Q223 to cover the student mandate.

Comment 6(c) asked whether office staff and administration will be provided for the kindergarten students that are annexed at Q223. No change in school supervisory or administrator positions at P.S. 223 is expected as a result of this proposal. If this proposal is approved, the administration of P.S./I.S. 124 will need to oversee classes at two locations. Additionally, P.S./I.S. 124 will be allocated two full-size administrative rooms in building Q223, as per the instructional footprint.

Comment 7(a) questioned whether the addition of pre-kindergarten classes or Gifted and Talented classes at P.S.223 was considered rather than a co-location in order to effectively use the under-utilized space in building Q223. Pre-kindergarten and Gifted and Talented Programs are based on a number of factors, including but not

limited to, demand, funding and geographic location. In this community, there was no demand or funding for additional pre-kindergarten and/or Gifted and Talented Programs. Rather, the main factor in the determination to propose co-locating the kindergarten of P.S./I.S. 124 with P.S. 223 was overcrowding at Q124 as well as excess space in Q223.

Comment 7(b) asked if the co-location is reviewed annually in the event that the enrollment increases at P.S. 223 and the two schools can no longer be accommodated in building Q223. As stated in the EIS, Q223 has adequate capacity to accommodate the co-location of P.S./I.S.'s kindergarten with P.S. 223 at full operational capacity. In the 2012-2013 school year, the projected total enrollment of both organizations in Q223 is approximately 811-871, yielding a building utilization rate of 82%-88%.⁵

Comment 7(c) inquired about additional school safety agents for building Q223. With respect to safety agents, pursuant to Chancellor's Regulation A-414, every school/campus must have a School Safety Committee ("the Committee"). The Committee is responsible for addressing safety matters on an on-going basis and making appropriate recommendations to the principal when it identifies the need for additional security measures, intervention, training, etc. The Committee is also 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. School Safety Plans are updated annually 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 necessary to address security concerns. The Office of School and Youth Development works collaboratively with the New York Police Department on the deployment of extra safety agents. Principals are encouraged to contact their Borough Safety Director to adjust the deployment needs of a school. Additionally, all principals of the co-located schools in Q233 will work together to re-write the Campus Safety Plan in an effort to accommodate arrival times, dismissal times, and any other operational issues that may arise.

Comment 8 A caller remarked that the unzoned students from the Astre Program should move out of P.S./I.S. 124 to accommodate zoned students. The caller opposes the kindergarten annex because she has older children and does not want her children at different sites. In response to the concern about unzoned students attending P.S./I.S. 124, it is important to note that there are very few unzoned students enrolled in the Astre program and this does not have a significant impact on the overcrowding at the school. In fact, only 1.3% of the total school enrollment are students who are unzoned to P.S./I.S. 124. Furthermore, if the students were zoned at the time of enrollment and subsequently moved, the child has the right to remain in the school to which he/she is enrolled. In terms of the concern regarding an annex site, this proposal is intended to provide additional space for P.S./I.S. 124 so it can continue serving its current students as well as admit new students. Moreover, as stated above, Q223 is approximately 1.8 miles away from Q124, and the P.S./I.S. 124 students co-located in Q223 would articulate to the first grade in building Q124.

Changes Made to the Proposal

No changes have been made to this proposal.

⁵ All projections referenced for the 2012-2013 school year and beyond reflect the forward promotion of cohorts by grade using the audited October 31, 2011 register for the base year.