Department of Education
Dennis M. Walcott, Chancellor

Public Comment Analysis

Date: December 13, 2011

Topic: The Proposed Grade Expansion of Esperanza Preparatory Academy (04M372) to a 6-12 School Beginning in 2012-2013

Date of Panel Vote: December 14, 2011

Summary of Proposal

The New York City Department of Education is proposing to expand Esperanza Preparatory Academy to serve sixth through twelfth grades. EPA is an existing choice middle school serving students in sixth through eighth grades in building M117 at 240 East 109th Street, New York, NY 10029, in Community School District 4. EPA is co-located with another middle school, Global Neighborhood Secondary School, TAG Young Scholars, a Citywide Gifted and Talented school serving students in kindergarten through eighth grade, and a District 75 school, P138M. 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.

Both EPA and Global Neighborhood currently admit sixth graders through the District 4 Middle School Choice Process. Both schools admit students through a limited unscreened process, and EPA also offers a dual language program that is screened for language requirements. TAG admits students through the Citywide Gifted and Talented admissions process in the elementary grades and through a school-based application process in the middle grades. P138M@M117 is one location of P138M, which serves 475 students in grades K-12 across nine locations. P138M@M117 currently serves approximately 35 students in grades 6-8.

EPA currently serves students in sixth through eighth grades. If this proposal is approved, EPA would begin enrolling ninth grade students for the 2012-2013 school year and continue to add one grade each year until 2015-2016, when it would reach full scale and serve sixth through twelfth grades. The high school portion of EPA would be entirely Spanish dual language.

EPA opened in September 2008 and graduated its first eighth-grade cohort in June 2011. If this proposal is approved, eighth-grade students enrolled in EPA would be able to stay at EPA for ninth grade and continue their dual language education, or choose to apply to other high schools through the Citywide High School Admissions Process. Other eighth-grade students throughout New York City could also enroll in EPA for ninth grade, depending on seat availability at EPA. Priority for the new EPA high school seats would be given to EPA's eighth-grade students.

Global Neighborhood currently serves students in sixth through eighth grade. When Global Neighborhood opened in September 2008, it was intended to serve sixth through twelfth grades at scale. The school decided not to open high school grades and instead serve only sixth through eighth grades. Therefore, the additional space in M117 that had been intended for Global Neighborhood's high school grades can be used to serve EPA's proposed high school grades.

The M117 building has the capacity to serve 1,313 students. Currently, the building serves approximately 900 students. This amounts to a utilization rate of 69%. If this proposal is approved, the building would approximately 100% utilized when EPA reaches full scale.

The proposal to expand EPA initially came from the school community. In May 2011, a grade expansion team composed of EPA teachers and administrators submitted a formal application to expand the grades served by the school. This grade expansion would allow EPA to serve both middle and high school grades at full scale. The expansion of EPA would provide an option for students from dual language middle school programs, including EPA's, and other Spanish-speaking students to further their dual language education in high school and become biliterate.

I. **Summary of Comments Received at the Joint Public Hearing**

A joint public hearing regarding this proposal was held at building M117 on December 7, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 275 members of the public attended the hearing, and 84 people spoke. Present at the meeting were Community School District 4 Superintendent Luz Cortazzo; District 4 Community Education Council ("CEC 4") President Hector Nazario; CEC 4 Representative Ellen Fox; Citywide Council on Special Education ("CCSE") Representative Ellen McHugh; EPA Principal Alexandra Estrella; Global Neighborhood Principal Luis Genao; TAG Principal Janette Cesar; TAG SLT Representative Patricia Saydah; TAG SLT Representative Clarence Lawrence; P138M Principal Jacqueline Keane; P138M SLT Representative Kim Ramones; New York City Councilmember Melissa Mark-Viverito; and Elizabeth Rose, Director of Manhattan Planning in the DOE Office of Portfolio Management.

The following comments and remarks were made at the joint public hearing on December 7, 2011:

1. *Elizabeth Rose, Director of Manhattan Planning in the DOE Office of Portfolio Management, asserted that:*
    a. The DOE has heard concerns since this proposal was posted our proposal, particularly from the TAG community who've expressed concern about safety and space allocation.
    b. The Building Council has already begun meeting to discuss space, for example, around lunch schedules.
    c. All principals in the building are committed to work together to support all the schools and ensure academic success.
    d. The DOE believes the building council is capable of working together to address these concerns and the DOE is also going to work with the building council to support them and address any necessary supports.
    e. The DOE has investigated some of the concerns, and with regard to safety, has found that there have been few to no incidents between TAG and EPA students.
    f. The format of tonight's meeting is to make comments, but if anyone has questions there are index cards that will be passed out and any questions submitted on the cards will be addressed after public comment is closed.
2. *Patricia Saydah and Clarence Lawrence, TAG SLT representatives, asserted that:*
    a. TAG is opposed to the expansion of EPA, primarily because of overcrowding and safety concerns associated with the co-mingling of elementary and high school students.
    b. TAG is a Gifted and Talented school that is diverse and 50% of its students qualify for free or reduced price lunch.
    c. TAG children will be endangered by co-location with high school students. There are many gangs in this neighborhood and high crime statistics associated with these gangs, who recruit in high schools, and thus, adding a high school in this campus will make it a magnet for gang recruitment.

    d. TAG students and teachers should not have to worry about gang problems.
    e. Unruly language and horseplay are common among young adults and TAG wants to protect its students from this.
    f. It is one thing to have a single, K-12 school, like NEST, but it's different when the schools do not have the same administration or a unified culture. TAG's culture is different than the other schools and the EIS doesn't take into consideration safety concerns or need for additional security.
    g. When TAG reached out to DOE regarding school safety, they were told the NYPD is responsible. The NYPD won't increase security until something happens.
    h. The proposal states that building utilization could go up to 110% and doesn't take into account rooms that TAG would lose to accommodate EPA.
    i. The Manhattan Borough President's office released a report in 2010 that listed TAG as a substandard facility. There is not enough cluster space, and it will get worse if a high school is added.
3. *Alexandra Estrella, Principal of EPA, asserted that:*
    a. Since its beginning, EPA has had a strong focus on establishing a dual language program not only for those that need the service but for those who are monolingual English speakers to learn Spanish as well. EPA's focus has been that its students should graduate EPA being fully bilingual. Research shows that in order for that to happen, scholars need five to seven years of exposure, and this why the school wants to expand.
    b. EPA's program is also open to anyone who wants to be multilingual in the community.
    c. EPA has worked with the other schools in the building over the years and will continue to do so.
    d. EPA is committed to working with all the schools in the building to make sure that all students in the building will be supported and achieve academic excellence.
    e. EPA wants this for all its students so they'll be college ready.
4. *Luis Genao, Principal of Global Neighborhood, asserted that:*
    a. In the four years that the schools have all been here, they've collaborated together to ease the pain of the community. This once was a difficult site and is not anymore.
    b. He believes in the vision of a K-12 program, and in EPA.
    c. The Julia Richmond Educational Complex provides an example of a successful K-12 campus.
    d. Like the schools in Julia Richmond, EPA has a record of success.
    e. The schools indeed have to work together to make sure that high school students have their own entrance and their own space, and if they do, they should not impact the other schools.
    f. He is as concerned as anyone about safety and they have people supervising outside the building to address these concerns.
    g. This isn't just about footprint, it's about working together to make the space successful.
5. *Ellen Fox, CEC 4 Representative, asserted that:*
    a. Her daughter has been in District 4 her whole life and attended EPA.
    b. She was classified as having a learning disability in elementary school, but was declassified when she was in seventh grade at EPA.
    c. This was a dangerous building until EPA came, but now it has a great track record of helping students make gains and develop confidence.
    d. This is a school that can take students who come in at Level 1 and they leave at Level 3 or 4.
6. *Ellen McHugh, CCSE Representative, asserted that:*
    a. Her child has a disability and has faced discrimination, and she knows no one here wants to discriminate so these issues need to be worked out in a positive way.
    b. EPA has 40% of its population as students with disabilities.
    c. EPA accepts all students with special needs, and takes in students who can't read and who aren't being served at other schools.

    d. The students who would attend the EPA high school would be students from the community who will most likely know the children in the other schools and may even be related.
    e. A K-12 campus will allow families to attend school together in the same building.
    f. The issue here is whether the adults can work together.
7. *Jacqueline Keane, Principal of P138M, asserted the following:*
    a. P138M has 42 students in M117, and 12 of them are fully included in EPA's classes.
    b. She has been around M117 for many years, and used to have high school students in the building and there were never any problems even though people were concerned.
    c. If you walk through EPA's halls during the day, you could hear a pin drop, which is very unusual for a middle school. EPA runs a very tight ship, and any student would be lucky to be able to attend through twelfth grade.
    d. She is in favor of the proposal, as it will allow her students to continue to be included in EPA's classes through high school.
    e. Sharing space can be difficult, and P138M shares space in many buildings. This building council works very well together though and can address shared space and work it out for the benefit of every child in the building.
8. *Councilmember Melissa Mark-Viverito asserted that:*
    a. All the parents here care about their children but it is sad to see parents pitted against each other, and this has been created by the DOE.
    b. She wants what is best for all students, and is proud to represent TAG, as it is the only G&T school serving primarily students of color, and is equally proud to represent EPA, which is making a lot of progress with its students.
    c. TAG's concerns are valid, and they have not received a response about their desire to expand.
    d. There is clearly a need for more time for dialogue, and she urges to the DOE to postpone this decision to allow more time.
    e. She heard about this proposal only last week from TAG parents, and the DOE should have involved her in the planning process.
    f. It is good that the building council is having meetings about the proposal, but there should be more transparency.
9. *Janette Cesar, Principal of TAG, asserted that:*
    a. TAG is a diverse school and TAG students know that the worst thing you can do is offend someone with a disability, or who looks different.
    b. The problem is space. TAG's art and Spanish classes are held in an office, and TAG needs to demand maximum space for its children, and maximum security.
    c. The current security cannot even manage the students that are here, and the neighborhood around the school is not safe.
    d. There is nothing wrong with EPA, and the schools work closely together and resolve any issues that may go on, which are very few.

Comments supporting the proposal

10. Thomas McBryde, Jr., principal of 23K522 Mott Hall IV in Brooklyn, asserted that his school is located in Brownsville, one of the deadliest places in the city, and is co-located with four other schools, including an elementary school and a high school. There have not been any safety incidents. He expressed that he understands parents' concerns, and that change is difficult, but in his school the principals have worked together to ensure that the environment in their building is not conducive to those negative elements. He also expressed that he wants to dispel the myth that a high school will attract gangs, and pointed out that gang recruitment occurs in elementary and middle school.
11. Several commenters expressed their support for the expansion because there are few dual language high school options, particularly within District 4. They noted the importance of having high-quality

options within their community and demonstrating to children that they do not need to travel far away to be successful.

12. Several commenters asserted that that they support the expansion because of the importance of dual language education. They expressed that the high school will allow students to become fully biliterate, which will open more opportunities to them and help them be successful in the job market and in life. They also stated that being bilingual improves problem-solving and other cognitive processes because it allows them to think in both languages.
13. Several commenters expressed that EPA is a family, and they feel very safe and supported in the school regardless of their individual needs. They stated that the staff and students all support each other and care about each other, and that the school serves all students.
14. Two EPA teachers asserted that they want to provide consistency for their students to help prevent high school drop-outs and ensure their success. One teacher stated that research shows personal relationships play a large role in academic success, and EPA already focuses on this and will continue to do so.
15. Several EPA students and parents shared stories about students who entered EPA far behind grade level and have been able to improve dramatically at EPA. Several students also expressed that they know they still have a lot to learn and believe and EPA high school will help them continue to grow and prepare them to be successful in college and life.
16. Several students from EPA expressed that EPA has helped them communicate with their Spanish-speaking family members and that they have been able to help their families learn English as well.
17. Several commenters noted that they do not want to disrespect anyone else or hurt the other schools in the building, but they believe they need EPA to grow to a high school, as it is able to take low-performing students and help them achieve at levels 3 and 4.
18. A teacher at EPA asserted support for the high school because EPA serves students with disabilities who cannot get services in other schools. The commenter noted that if EPA expands to a high school, it will continue to serve these students and will create additional opportunities for them, such as job training programs.
19. Several commenters acknowledged that they understand the concerns expressed by the parents of young children in the building, but asserted that EPA's high school will be safe and well-run and that they trust the principal and staff to do a good job. They noted that school already has high levels of supervision in and around school and that they have kept crime out and will continue to do so.
20. Several commenters asserted that the community should stay united and that EPA's high school will serve the community and give parents a local option for their children where they will know their children will be prepared for college.
21. One EPA teacher noted that everyone at the hearing had an opportunity to sign up to speak and that it is upsetting to hear parents make comments about the number of EPA students who are speaking. The teacher also asserted that the students at EPA work very hard and the school helps students make a lot of progress, and that it is offensive that people are saying gangs will be a problem at this school.
22. One commenter asserted that EPA accepts students from its entire community and that it is in the 86th and 76th percentile for progress. The school helps most in-need students get where they need to be. EPA's after-school program provides students with opportunities to create lasting bonds with teachers and peers, and includes many enrichment programs in academics and arts. The school has strong and diverse relationships with non-profits and is adding programs for next year.
23. A dean at EPA noted that this is a beautiful community and it can only get better by adding more opportunities.
24. A teacher from EPA stated that she is proud to say that she is a teacher at EPA, especially as she looks at the students who spoke so beautifully tonight, not one of whom shows evidence that they would be involved in such violent and aggressive behavior. They've shown respect for everybody. She came to EPA with the intention of opening up an inclusion program three years ago, only to find that the principal already had an inclusion model that supported all students, including those who came in performing at high levels and those with moderate, mild, and severe disabilities.

25. One EPA student noted that a high school won't attract gangs. Gangs begin as early as elementary school, and it is unfair to say that an EPA high school will attract gang violence.

Comments opposing the proposal

26. Several commenters, including parents, teachers, and students at TAG, asserted that there is not enough space in the M117 building for EPA's high school. They expressed concern that TAG will lose some of their classrooms.
27. Several commenters expressed concern that kindergarten students already eat lunch at 10:00 a.m. and they will need to start lunch even earlier if there is a high school in the building, and that they will not be able to have enough time in the gym or other shared spaces.
28. Several commenters from the TAG community questioned how the DOE calculates utilization figures and asserted that it is unfair to expand EPA because it will push the building utilization up to 111%.
29. Several commenters noted that they are not opposed to dual language schools and in fact support dual language education, but they oppose *this* expansion in this building.
30. Several commenters expressed that EPA has not proven itself to be academically successful enough to warrant expansion. They pointed out that the percent of students performing on grade level in math and ELA is low, and that there are other schools in the city, like the Harlem Success Academies and Amistad, that serve the same populations and get higher scores.
31. Several TAG parents asserted that having high school students in the same building as young children is unsafe and that high school students will attract violence and gang activity to the building.
32. Several TAG parents asserted that there are a lot of drugs and violence in the community around building M117, and having a kindergarten through twelfth grade campus in this community is not the same as having one on the Upper East Side at the Julia Richmond Educational Campus.
33. Several commenters expressed concern that there will not be sufficient security to keep the high school students away from the young students and that young students may be exposed to undesirable behaviors or physically harmed as a result.
34. One TAG parent noted that he often sees very poor behavior outside of the school building from the current middle school students, and that there is nothing being done to stop it. These problems will only get worse if a high school is added.
35. One TAG parent asserted that it is easy to obtain guns in this area and that when he grew up here, one of his friends was shot by a student from another school and he does not want his child to be subjected to that.
36. Several commenters expressed that TAG should be given the opportunity to expand. They asserted that TAG has requested to expand to serve high school students and to serve more students within their existing grade span, but that the DOE told them there was not enough space.
37. One commenter asserted that it is not fair to the young students or to the high school students to have grades K-12 in the same building, as it doesn't give anyone the space they need to develop and be successful.
38. One commenter stated that both TAG and EPA should be able to expand to high schools in separate buildings, and that TAG is the only Citywide G&T school that serves a diverse students body from Northern Manhattan and the students haven't been getting their fair share even though they are performing well.
39. Several commenters stated that they dislike this process and that the community is being divided and set up as adversaries.
40. A TAG alumnus who now attends Bronx Science asserted that having a high school in the building will attract violence. His brother now attends TAG, and he can't allow this to happen.
41. One TAG parent stated that she grew up in this community and could have sent her children to one of the other Citywide G&T schools but chose TAG because it is home. She stated that the NYPD has

had to come to the building, gangs have been in the building, and her daughter has been assaulted. She noted that she does not oppose the expansion because of the students' language or disabilities, but because it will be unsafe.

42. One commenter noted that it was nice to hear from students, but that his concerns were not addressed and this is not being done in a way that all voices are heard.
43. One commenter noted that it seems suspicious that 100% of parents who submitted the Learning Environment Survey submitted it online.
44. One commenter noted that the DOE had another building in this area, P.S. 109, which is now being used for an organization called Artspace. She urged the community to fight for the return of P.S. 109 to use as a school building, and to use it for EPA's high school so there is enough space for all schools.

<u>The following comments and questions were submitted in writing at the joint public hearing on December 7, 2011:</u>

Comments supporting the proposal

45. A parent of an EPA student wrote that it appears that TAG is refusing to collaborate with the principal of EPA and the other schools. She expressed that the TAG SLT's comments were appalling, and that it is unfair to generalize and label all high school students as magnets for crime. She also noted that even though the TAG SLT was able to give examples in other schools, they could not name any incidents that have happened here.

Comments opposing the proposal

46. One commenter wrote that the DOE should not put forth a proposal for an expansion without thinking about safety issues, like more security guards. Two or three guards cannot adequately cover seven exits.
47. One commenter noted that the DOE is painting anyone who opposes the expansion as opposed to dual language education, which is untrue. The commenter also asserted that the joint public hearing exploited kids and emotions by allowing EPA students to speak.
48. One parent wrote that TAG is a great school and it is scary to think about what will happen with high school students in the building. The commenter asserted that the DOE needs to find a better way to handle this to make sure there is safety in this school.
49. A sibling of two TAG students wrote that she is in high school and does not want her siblings exposed at such a young age to what she sees in high school.

Questions regarding the proposal

50. One commenter asked if the fact that the building principals are already meeting to discuss schedules, safety, etc. means that the decision on this proposal has already been made, and why they are already meeting when they would have plenty of time if the expansion is approved.
51. Several commenters raised questions about safety, including who will supervise the older children, will metal detectors be installed, and if the NYPD has been approached regarding funding for additional security.
52. Several commenters asked why TAG has been denied the opportunity to expand when it has applied in the past.
53. One commenter asked how the high school plans to address the lab space needed to fulfill Regents requirements.
54. One commenter asked why Global Neighborhood chose not to expand as planned.

55. Several commenters asked about space, including how it is fair for EPA to take space from TAG and deprive TAG students of space necessary for programs like art, music, and technology, and how all students will be accommodated in shared spaces like the lunch room.
56. One commenter asked for examples of K-12 campuses that work well.
57. Two commenters wrote about G&T programs, asking why TAG is being asked to share space with a separate high school while the other Citywide G&T schools do not, and why the DOE is not expanding Citywide G&T to meet growing demand.
58. One commenter asked if the DOE believes that EPA actually achieved 100% online submission of parent Learning Environment Surveys when the Citywide average is only around 57% and the school across the street had only 3%, and if they will be investigating this.
59. One commenter asked if it is normal to expand a school with low proficiency rates, and what the requirements are for expanding a program.

II. **Summary of Issues Raised in Written and Oral Comments Submitted to the DOE regarding the proposal**

In total, 106 comments were received from 44 individuals via email, and 9 comments were received over the phone opposing the proposal. The comments cited the following reasons for that opposition:

60. Once the proposed expansion is completed, the building could be utilized at over 100% of its target capacity and would be overcrowded.
61. TAG may lose classrooms that it needs to serve its students, and TAG's space in the building is already utilized at over 100% of its target capacity.
62. Students already do not have enough time to eat or have gym, and this will get worse if a high school is added.
63. Having high school students in the building will be dangerous and will expose young students to undesirable and inappropriate behaviors.
64. EPA students already exhibit poor behavior, and TAG parents assert that they have witnessed it in and out of the school building and that their children have been bullied.
65. EPA does not manage their middle school students well as it is, and it will get worse with high school students.
66. EPA's performance on the New York State English Language Arts and Mathematics exams is lower than the District 4 average, and this performance does not warrant an expansion to high school.
67. TAG should expand its enrollment or expand to a high school instead, so that it can continue serving its diverse G&T population.
68. If a new school is going to be placed in the building, it should be one that shares TAG's philosophy, like KIPP or Harlem Success Academies.
69. TAG serves very bright students and needs all its space and more. It does not have the same resources as the other Citywide G&T schools.
70. TAG serves students from all over the city and parents who have to travel a long way to get there will not want to send their children there if a high school shares the building.
71. Having a high school in the building will attract the many gangs that operate in the neighborhood.
72. There was insufficient notification of this proposal to the schools, CEC, and local officials and as such, the vote should be postponed.
73. The number of students enrolled in the M117 building in 2010-2011 as indicated in the EIS is different from the number listed in the 2010-2011 Blue Book.
74. The expansion of EPA will negatively impact TAG's instructional and extracurricular programming because it will reduce TAG's space.
75. The expansion of EPA will negatively impact elementary and high school students across the city by reducing TAG's space and its ability to serve more students and help send minority students to specialized high schools.

One comment was received via email and one comment was received over the phone supporting the proposal. The comments cited the following reasons for that support:

76. The teachers are dedicated and caring.
77. The school take students who have not been academically successful and helps them succeed.
78. The students at EPA are well-behaved and respectful and there have been no major disciplinary issues.
79. Parents and families are welcomed in the school.
80. The school will be an asset to the community.

On Monday, December 12, the DOE received a letter from the TAG SLT registering the following comments regarding the joint public hearing. While these comments do no address the merits of the proposal, and thus do not require a response, the DOE is including the comments and responses in this public comment analysis. The letter asserted that:

81. Members of the TAG community were not permitted to sign up until after members of the EPA community and were told that sign-up was full before the sign-up should have been closed.
82. The District 4 Superintendent, who facilitated the hearing, cut off speakers who were supportive of TAG after their two minutes but did not do so for speakers from the EPA community.
83. The DOE set the tone of the hearing as divisive and tried to pit the communities against each other.
84. Allowing students from EPA to speak, particularly so many at the start of the meeting, was inappropriate and led to TAG parents having to leave without getting to speak because of the late hour.
85. Attendees should not have had to sign an attendance sheet, which EPA staff asked everyone to do. Attendees may have signed this sheet and thought it was the speaker sign-up sheet.

On Monday, December 12, the DOE also received a petition from the EPA community supporting the expansion. This petition was signed by 61 individuals and asserted that:

86. East Harlem has a very high percentage of English Language Learners.
87. Both ELLs and native English speakers can benefit from being bilingual, and this high school will allow scholars to fully acquire a second language before entering college and the workforce.
88. Parents would like to have a school in the community that provides necessary services to students and ensures that dual language education does not need to end after middle school.

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

Statement by the DOE

Comment 1 is a statement provided by the DOE, and does not require a response.

Support for the expansion of EPA in M117

Comments 3-7, 10-25, 45, 76-80, and 86-88 support the proposal and do not require a response.

Diversity

Comments 2b, 8b, 9a, 38, and 67 make factual assertions regarding the diversity of the TAG student population, particularly as compared with other Citywide G&T schools, and do not require a response.

Dual Language

Comments 29 and 47 assert that opposing this particular proposal does not imply opposition to dual

language education, and do not require a response.

Process

With respect to comments 8a, 39, 42, 47, 81 and 84, the EIS and joint public hearing process is laid out by state law. Any member of the public who signs up to speak at a joint public hearing is permitted to do so, as was the case at this hearing. Speakers are called to speak in the order in which they signed up. Speaker sign-up was opened at this hearing at 5:30 p.m., which was announced in the lobby outside the auditorium to all attendees present at that time. Speaker sign-up was stationed with clear signage and a DOE staff member at the entrance to the auditorium, so that all who entered the hearing room passed by the sign-up. According to the recording of the hearing, the Superintendent announced that sign-up was closed 15 minutes and 25 seconds into the meeting, consistent with the pre-hearing notice. This process was announced in the notification of the joint public hearing that was distributed to parents at all impacted schools, and was repeated at the beginning of the hearing. Furthermore, any attendee who was not able to sign up to speak or had a question during the hearing was given the opportunity to submit comments and questions in writing at the hearing, which were addressed after the public comment session at the hearing and have been included in this Public Comment Analysis.

With respect to comment 82, to the best of the DOE's knowledge, all speakers were held at or near the two-minute limit. DOE staff kept time and signaled to speakers when they had 30 seconds remaining and when time was up. If the speaker did not stop when time was up, the Superintendent approached the speaker to remind them their time was up. For Spanish-speaking commenters, DOE did not count the time it took time for the interpreters to translate back to English over the microphone towards the two minutes, in order to ensure that all commenters had equal speaking time. Official representatives of the impacted communities, whose comments are summarized in comments numbers 2 through 9, were not limited to two minutes.

With respect to comment 83, the DOE's statement at the beginning of the hearing was intended to address questions that have been raised in response to the proposal since it was posted on October 27th. These questions had all come from the TAG community, and as such, the responses were directed toward TAG's questions and concerns.

With respect to comment 85, everyone was permitted to enter the hearing regardless of whether they signed in. No one in attendance at the hearing suggested to any DOE officials that they had signed the wrong sign-up sheet and as a result were unable to speak at the hearing.

With respect to comment 50, this proposal will be voted upon by the PEP on December 14th. The Building Council has begun discussions about the potential implications of the proposal to ensure that the schools are prepared for the expansion if it is approved, and to ensure before the decision is made that the schools will be able to work together to implement the expansion successfully.

With respect to comments 8d-f, and 72, this proposal was released on October 27th, over six weeks ago. Before the proposal was posted, the DOE engaged all of the building principals and their networks to get their input. The District 4 CEC was informed of EPA's intent to apply for a grade expansion on April 14, 2011, and was informed of the proposal on October 12th, at which point it was well-received. When the proposal was posted, the DOE distributed notification of the proposal along with information regarding the hearing, the PEP vote, and how to provide feedback on the proposal to all of the impacted school communities, as well as to the District 4 CEC, Citywide councils on special education English Language Learners, high schools, and District 75, and the Manhattan Community Boards. Additionally, the DOE's Office of Public Affairs notified local elected officials of the proposal on October 27th via email, including Councilmember Mark-Viverito. Prior to the release of the proposal, EPA's application to expand had been included in the Office of Portfolio Management's Manhattan Borough Briefing for

elected officials on September 6th, and a copy of that presentation was distributed to elected officials on October 17th. Since the proposal was released, the community has had the opportunity to submit feedback via email and phone, and the DOE held a parent meeting at TAG on November 29th to respond to questions and discuss the proposal.

Space

With respect to comments 2a, 2h, 28 and 60, the DOE seeks to fully utilize all its building capacity to serve students. The M117 building is currently underutilized and has the capacity to serve additional students. Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation.

With respect to comments 9b, 26, 38, 55, 61, 69, 74, and 75 The Citywide Instructional Footprint (the "Footprint") is the guide used to allocate space to all schools, including the Citywide G&T 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/8CF30F41-DE25-4C30-92DE-731949919FC3/87633/NYCDOE_Instructional_Footprint_Final9210TNT.pdf

Currently, TAG, EPA, and Global Neighborhood all have space allocations in excess of the allocation defined by the Footprint for each school. If this proposal is approved, all schools would continue to receive at least their baseline Footprint allocation even after EPA reaches full-scale. As noted in the EIS, there would continue to be excess space in the M117 building after EPA reaches full scale. The allocation of excess space will be determined by the Building Council, which includes the principals of all the schools in the building, in conjunction with the DOE Office of Space Planning. The amount of excess space in the building is such that EPA could be expanded without reducing TAG's current space allocation or its enrollment.

According the 2010-2011 Enrollment Capacity Utilization Report ("Blue Book"), while the M117 building as a whole is underutilized, TAG's utilization rate is 109% of its target capacity. This is likely due to the fact that the Blue Book calculates the capacity of classrooms based on a target class size that is lower than the maximum class size contractually allowed. As a Citywide G&T school, TAG's classes are generally larger than the target class size. For example, the target class size for kindergarten through third grade is 20 students, and TAG's average class size for these grade levels is 26. As described above, TAG and all schools in the building will continue to receive at least their baseline Footprint allocations based on the number of class sections enrolled and grade levels served.

With respect to comments 27, 62, 74 and 75 the schedule for shared spaces, such as the cafeteria, gymnasium, and auditorium, will continue to be decided upon by the Building Council if this proposed expansion is approved by the PEP. The current shared space schedule includes four lunch periods. Given the 475-student capacity of the cafeteria, it will be possible to develop a lunch schedule that continues to have only four lunch periods while avoiding any overlap between young students and high school students. This may include having two middle schools use the cafeteria together. 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.

With respect to comment 53, there are currently two science labs and four science demo rooms in the M117 building, with one lab allocated to TAG and the remaining lab and demo rooms allocated to Global

Neighborhood. If this proposal is approved, these rooms would be reallocated among the schools to ensure that the proposed high school grades have access in order to meet Regents requirements.

Safety

With respect to comments 2c-e, 2g, 9c, 31-35, 46, and 51 the DOE expects all schools to develop codes of behavior and implement policies and procedures to ensure safe and appropriate behavior in and around the school building. Pursuant to Chancellor's Regulation A-414, every 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 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. The schools will continue to work with the building's safety agents to ensure safety of all students, and the DOE will investigate options for providing additional support in this area. EPA currently implements a number of gang prevention activities with its middle school students, and intends to work with the DOE and other partners to continue and strengthen those efforts with its high school students if it is approved to expand.

With respect to comments 9d, 41, 64, and 65, the DOE has investigated prior incidents between TAG and EPA students. As Principal Cesar commented at the joint public hearing (comment 9d in this document), there have been very few incidents in the past and the schools work closely together to resolve any issues that arise.

With respect to comments 2f, 31, 32, 37, 40, 48, 49, 56, 63, 68, 70, and 71 the DOE believes that TAG and all the existing schools can effectively share the M117 building with EPA's high school grades, just as they had intended to share the building with Global Neighborhood's high school grades. A number of other buildings throughout the City, including M013 in District 4, house multiple schools that collectively span grades kindergarten through twelve and have been able to do so successfully. Other K-12 campuses include:

- The Julia Richman Educational Complex, which houses four small high schools, a K-8 school, and a District 75 program
- Brooklyn Collegiate: A College Board School, which serves sixth through twelfth grade, and shares a building with Achievement First Brownsville Charter School, which currently serves kindergarten through third grade
- Mott Hall IV, a middle school, which shares a building with Eagle Academy for Young Men II, which currently serves sixth through ninth grade and will serve sixth through twelfth grades at full scale, and Leadership Preparatory Ocean Hill Charter School, which currently serves kindergarten and first grade
- J.H.S. 13 Jackie Robinson, a middle school, which shares a building with Central Park East I, an elementary school, and Central Park East High School

In their preliminary discussions about the proposal, the Building Council has already begun exploring ways to keep the older and younger students apart, including separate entrances, staggered arrival and dismissal times to minimize out-of-school interactions, and shared space schedules that avoid overlap of high school and elementary students.

With respect to comment 51, metal detectors will only be installed if they are deemed necessary and requested by the Building Council. If they are requested, the DOE will work with the NYPD to monitor safety in the building and will assess whether metal detectors are necessary based on the building's safety records. Many high schools across the City operate without metal detectors, and find that it helps build a

culture of trust in the school community.

Performance

With respect to comments 30, 59, and 66, the DOE acknowledges that TAG has received As and Bs on its annual progress reports. The DOE also acknowledges that EPA has received grades of D and C on the performance subsection of its progress reports. However, it has consistently received As overall and in the progress and school environment subsections.

Grade expansion proposals are evaluated using several tools and metrics, not simply progress report grades and state scores. These include interviews, evaluation of sample lessons, visits to observe teaching and learning in the school's current grade levels, potential demand for the proposed school, and quality reviews. Based on this thorough evaluation, EPA's high school expansion was approved by the Office of New Schools in October 2011.

Gifted & Talented

With respect to comments 36, 52, and 67, according to records dating back to 2007 (before EPA and Global Neighborhood were opened in the building), the DOE did not receive a formal application from TAG requesting to expand its grade span.

With respect to comments 38, 57 and 67, in the past TAG was not permitted to permanently expand its enrollment because the additional space in the building had already been intended for high school grades of Global Neighborhood. Additionally, the DOE is working to meet the growing demand for G&T seats by opening new programs across the city. For example, a new District 4 program was opened this year in P.S. 102, and the DOE is exploring possibilities for new programs in districts that do not currently have such programs.

With respect to comments 2i, 57, and 69 The Anderson School does share a building with other schools and was included in the report from the Manhattan Borough President's office as well, and NEST+M is itself a K-12 school. The buildings that house NEST+M and Anderson are both currently utilized at over 100% of their target capacities, and Anderson's building is projected to be at approximately 110% capacity when all schools in the building are at full scale.

With respect to comment 75, this proposal does not require TAG to reduce its enrollment, and thus does not have an impact on the number of students TAG prepares for admissions to specialized high schools.

Global Neighborhood

With respect to comment 54, Global Neighborhood and the DOE determined that the school could better serve its students by focusing on the middle grades and ensuring success at that level, rather than expanding to high school.

Online Survey Submission

With respect to comments 43 and 58, EPA strives to be a "green" school and for 100% of surveys to be completed online instead of on paper. The school has had very high rates of online survey completion by parents, students, and teachers each year. Specifically, of the parents who completed the survey in each of the last three years, the percent who completed it online is included in the table below. During parent-teacher conferences, EPA opens its computer lab and sets up additional laptops for parents so that they can complete the survey online.

	2008-2009	**2009-2010**	**2010-2011**
Online Survey Submission Rate	98%	99%	100%

Enrollment

With respect to comment 73, as explained in the EIS, the 2010-2011 enrollment for the M117 building in the EIS excludes "long-term absences," or students who have been absent continuously for thirty days or more. The Blue Book does not exclude these students, and as such, the enrollment figures differ slightly.

P.S. 109

With respect to comment 44, the DOE no longer owns this building and therefore it is not a viable option for EPA's proposed high school grades.

IV. **Changes Made to the Proposal**

No changes have been made to the proposal in response to public feedback.