



Public Comment Analysis

Date: January 18, 2011

Topic: The Proposed Co-location of Millennium Brooklyn High School (15K684) with the Secondary School for Law (15K462), the Secondary School for Journalism (15K463), and the Secondary School for Research (15K464) in School Building K460

Date of Panel Vote: January 19, 2011

Summary of Proposal

On December 3, 2010, the Department of Education (“DOE”) issued a proposal to site a new selective high school, Millennium Brooklyn High School (15K684, “Millennium Brooklyn”), in school building K460 located at 237 7th Avenue, Brooklyn, NY 11215, in Community School District 15. If this proposal is approved, the school would be co-located with three existing 6-12 schools, the Secondary School for Law (15K462), the Secondary School for Journalism (15K463), and the Secondary School for Research (15K464), and an Alternative Learning Center (88K987, “ALC”). 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.

In two separate Educational Impact Statements (“EIS”) published also on December 3, 2010, the DOE has proposed that the Secondary School for Law and the Secondary School for Journalism gradually phase out their middle school grades due to chronic under-enrollment and an inefficient use of resources. Co-locating Millennium Brooklyn is not contingent on truncating the middle school grades at the Secondary School for Law and the Secondary School for Journalism. If this proposal is approved, there is currently sufficient space available in K460 for all four schools, the ALC, and Millennium to operate at scale.

In an effort to expand the pool of options for academically gifted students and to reach high-achieving students in underserved communities, the DOE has opened six new selective schools since 2002. If approved, Millennium Brooklyn would be the seventh selective school to open under this initiative. Admission to Millennium Brooklyn would be open to any student in the city who meets the school’s selection criteria through the citywide high school admissions process. Millennium Brooklyn would gradually phase in by adding one grade per academic year beginning with a ninth grade cohort in September 2011.

Millennium Brooklyn would also offer an ASD Nest program, a specialized program for students with Autism Spectrum Disorders (ASD) that is not widely available in other New York City high schools. In the ASD Nest program, students with ASD are taught in a classroom alongside general education students.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at the John Jay Campus on January 11. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 200 members of the public attended the hearing, and 56 people spoke. Present at the meeting were:

- Staten Island/Brooklyn High School Superintendent Aimee Horowitz
- Community Education Council President Jim Devor and CEC Representative Mark Kohn
- Secondary School for Research Principal Jill Bloomberg and School Leadership representatives Cheidy R. Perez, Robina Taliaferrow and Demar Ayee
- Secondary School for Law Principal Oneatha Swinton and School Leadership Team representative Bridgette Edwards
- Secondary School for Journalism Principal Abby Reif and School Leadership Team representatives Clarence R. Neely, Susan Stein, John Ruiz, Jason M. Ott and Miriam Maldonado
- Corlace Campbell from the ALC in K460.

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

1. Representatives from the Secondary School for Research stated that:
 - a. A commenter noted that opening the new school in K460 would have a disparate impact on minority students and would create unequal opportunities.
 - b. A commenter noted that the community that needs access to high quality seats would not be served by this proposal. The middle class already has access to such options.
 - c. Multiple commenters stated that the DOE has failed to provide appropriate financial and organizational support to the existing schools throughout transition periods. The commenters also noted that K460 is recognized as an under-funded building, but it still receives less than comparable schools. The commenters stated that there have been multiple problems related to the facilities, and necessary repairs have not been made.
 - d. A commenter stated that the number of security incidents in the building is well below the DOE's threshold for installing metal detectors, yet they have not been removed.
 - e. The school's successes were cited. A commenter stated that research proves that segregating by performance and test scores is harmful to students; an article in Phi

Beta Kappa was cited. Commenters stated that students in the school are made to feel undesirable and not enough is being done to address the achievement gap.

- f. Commenters suggested that the existing schools should get extra funding that Millennium is slated to get as a new school and as part of the Selective Schools Initiative. There is not enough funding for Saturday Academy or for books and supplies.
 - g. Representatives demanded:
 - i. Removal of metal detectors;
 - ii. Improvements to building's electricity, ventilation systems; renovations to cafeteria and creation of a media center;
 - iii. Building should represent diversity of City, borough and district;
 - iv. Allow the school to change its name;
 - v. Provide incentives to schools that close the achievement gap.
2. A representative from the Secondary School for Law commented that:
 - a. The process regarding the proposal was not transparent and that the Millennium leadership team disseminated and publicized information regarding the proposal to move Millennium to K460 within hours after the idea of the proposal was shared by the DOE with existing schools in the building.
 - b. The DOE has not provided enough support or funding to existing schools in regards to facilities, achievement and enrollment issues.
 - c. Although Millennium's programs seem great, existing schools would not have the opportunity to implement such programs due to a lack of support, even though Park Slope parents may be interested in such options for their children.
 3. Representatives of the Secondary School for Journalism commented that:
 - a. The DOE should preserve the diversity and opportunity available to all students.
 - b. Existing schools and students should not feel like second class citizens, but if this proposal were approved there may be a negative impact on existing schools and students.
 - c. To date, the schools have collaborated effectively together.
 - d. The DOE has not supported the existing schools effectively or provided funding for changes and facilities upgrades.
 4. CEC 15 representative Jim Devor stated that Millennium High School in Manhattan is a diverse school and is in high demand. He further stated that Park Slope parents have worked in the past to enroll their children in selective schools outside of the borough and therefore this proposal would provide an option for those families in Brooklyn. He noted that this may be a case of separate but equal, because the DOE does not state that the existing schools are failing.
 5. Assemblyman Jim Brennan commented that the proposal is an insult to the district; that the DOE and the Bloomberg administration are not building viable options in the

community and that the proposal should be withdrawn. He stated that the existing schools in K460 are successful and should be supported.

6. Margaret Kelly of the Brooklyn Borough President's office commented that the Borough President had provided \$500,000 for renovation to the building for purposes of building a schoolyard. She further noted that she supported the idea of a new Millennium High School, but that the Brooklyn representative on the Panel for Educational Policy would propose and seek support for an amendment to this proposal to stipulate that the DOE agree to:
 - a. Upgrade the electrical system in the building;
 - b. Renovate bathrooms;
 - c. Provide adequate wifi access;
 - d. Create a media center.
7. One commenter qualified his support for the proposal by stating that:
 - a. The new school is desired by many parents, but that the schools need to work together and work with the community to ensure a successful co-location.
 - b. There needs to be a commitment to diversity and an even split of all resources for all of the schools in the building.
 - c. The ALC in the building should be re-sited.
8. Seven commenters expressed support for the proposal, predominantly due to the fact that the proposal would dedicate space to an ASD Nest program by stating that:
 - a. Existing ASD Nest programs at M.S. 447 and Math and Science Exploratory Middle School were successful and the new program at Millennium High School would emulate those programs;
 - b. It is difficult to find appropriate special education programs for students on the autism spectrum; most programs are in Manhattan and give preference to students from Manhattan;
 - c. The existing Millennium High School in Manhattan and proposed Millennium High School in Brooklyn would be diverse and inclusive, especially in regards to special education students.
9. Approximately 40 commenters expressed opposition to the proposal for the following reasons:
 - a. Schools with financial and political backing are being pushed into existing school buildings;
 - b. The DOE and PEP do not listen to the needs of the community and the existing schools involved should have a voice in the decision-making process;
 - c. Existing schools need more resources in order to reduce class sizes and address overcrowding;
 - d. The existing schools and their students feel unsupported and undesired and are "set up to fail;"

- e. The DOE does not care about education or student success for underprivileged students; “white” schools receive more funding than minority schools.
- f. Since schools must deal with budget cuts, it cannot be that there are additional funds to open new schools;
- g. The existing schools in the building did not receive the same new school funds that Millennium will enjoy when they were new small schools;
- h. The existing schools in the building are good schools, serving students that are going to excellent colleges and earning scholarships and prestigious internships;
- i. These schools are a vast improvement over previous schools that used to inhabit the building;
- j. The Atlantic Theatre Company has a successful collaboration with the Secondary School for Research and is developing a long-term residency program with them;
- k. There is no need or demand for additional high school seats in Brooklyn;
- l. Building improvements would mostly benefit Millennium, not existing schools;
- m. Millennium High School in Manhattan is predominantly white;
- n. The DOE may be assuming that there is a community desire for such a proposal when that is not the case;
- o. Rather than opening a new school, one of the existing schools in the building could serve the same purpose as the Millennium school based on the same model;
- p. The DOE leadership would rather serve minority students in charter schools than supporting the existing schools on the John Jay Campus;
- q. Special education needs can be met by existing schools and there is no need for a new school to meet this demand.

The DOE received comments at the Joint Public Hearing which did not directly relate to the proposal.

- 10. The truncations at the other two existing schools does not make sense when the DOE claims there are not enough high-quality middle schools in Brooklyn.
- 11. Grassroots Education Movement advised those present of a rally on January 22, 2011 regarding charter school placements and school phase-outs.
- 12. One commenter complained about the impact of a boiler replacement on parking in the neighborhood.

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

- 13. A commenter expressed his support for the proposal, but also raised concern that once Millennium High School is in place, something should be done about the metal detectors in the building. He also stated that the building needs to be repaired.

14. A commenter expressed her support for the proposal, suggesting it would benefit students at the existing schools in addition to people in the neighborhood who desire a selective high school.
15. Commenters expressed opposition to the proposal for the following reasons:
 - a. Support for the proposal is based primarily on Caucasian parents.
 - b. The plan was contrived in secrecy.
 - c. The proposal disregards the needs of existing students in the building.
 - d. Siting a program for students on the autism spectrum (ASD) amidst controversy and racial tension would prevent the program from being successful.
 - e. Schools on the John Jay Campus should be revitalized before a highly selective school is sited in the building.
 - f. Past experience with the prospective principal for Millennium Brooklyn has led the commenter believe that the prospective principal is not qualified to run a school with an ASD nest program.
 - g. The approval of the proposal has already been decided, given the perceived absence of Panel for Educational Policy members at the hearing.
 - h. Siting a new, well-funded school in the building, which caters to a mostly Caucasian demographic, would deliver a devastating psychological blow to students in the existing schools who already are marginalized by unwarranted metal detectors, underfunded by the DOE, served in dilapidated facilities, and are labeled as attending a failing school despite consistent yearly gains.
 - i. The new school would receive additional funding that would not be matched for the existing schools and would therefore creates a situation in which students of different races are treated separately and unequally.
 - j. Parents in Park Slope who support the proposal do so despite a surplus of available seats in Brooklyn, which are in schools predominately populated by non-white students, and the school they are supporting would have selection criteria that ensure a predominately Caucasian student population. Thus, the proposal would in effect support de facto segregation, by providing Caucasian students with the opportunity to attend a separate separate that would not serve non-Caucasian students. Therefore, this situation would create a separate and unequal situation, causing psychological harm to students currently in the building.
 - k. Siting a new, highly-selective school sends a message that the existing schools are inferior, while they are, in fact, not.
 - l. The DOE should promote the existing schools to Caucasian students in Park Slope, instead of creating a separate option, which would have more social benefits and would create more widespread empathy for the underprivileged.
 - m. The proposal is based on poor logical arguments and misrepresentations, such as the assertion that the DOE strives to create high-quality options for all students.

The proposed new school is targeted to serve students in underserved populations when that is not really the case. There is no need to create additional high school seats when there is already a surplus of seats available, and when there is a need for elementary and middle school seats instead.

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

With regard to comment 1a, admission to Millennium Brooklyn would be open to all students who meet selection criteria, regardless of race or socio-economic status. Additionally, as stated in the EIS regarding the proposal, the DOE anticipates that students enrolled in the existing schools on the John Jay Campus would not be adversely impacted by this proposal, rather the DOE anticipates that there may be capital improvements made to the building as a result of this proposal that would benefit all of the existing students at the John Jay Campus.

With regard to comment 1b, all students in the City have equal access to all high schools through the Citywide High School Application Process, regardless of their race or socio-economic status. This proposal would create additional high quality high school seats that would expand the number of students who have access to high quality options.

With regard to comments about the funding and allocation of resources made by commenters 1c, 1f, 2b, 3d, 7b, 9b, 9c, 9d, 9f, 15c, and 15e, schools receive funding allocations based on numerous factors that include criteria under the Fair Student Funding per capita allocations, in addition to weighted allocations for certain populations such as English Language Learners, Special Education students, as well as Title I status, the number of students who qualify for free lunch, and whether the school is a new school.

With regard to comments 1d, 1g.i, and 13, guidelines governing the decisions on safety in the school and the use of metal detectors are addressed in Chancellor's Regulations A-412 and A-432.

With regard to comment 1e, the selection criteria for Millennium Brooklyn has not yet been determined. Nonetheless, screening students according to test scores and/or performance is currently practiced in many existing New York City schools, and factors such as race are not taken into account.

With regard to comments 1g.ii, 9l, and 13, the DOE anticipates that any capital investments and improvements made to the building as a result of the siting of Millennium Brooklyn in the building would benefit all of the existing schools and students. Future decisions on facility upgrades will be made separately from this proposal.

With regard to comments 1g.iii, 3a, 3b, 7b, 9a, 9c, 9e, 15a, 15h, 15j, and 15l, the schools in the building will represent the diversity of the students who apply to and are enrolled in those schools. DOE enrollment decisions are made without regard to race or socio-economic

status. Admission to Millennium Brooklyn would be open to all students who meet selection criteria, regardless of race or socio-economic status. Priority would be given to residents of Brooklyn. Millennium Brooklyn would not exclude students of one particular race or socio-economic status, and therefore the assumption that this proposal would cause existing students psychological harm is unfounded.

With regard to comment 1g.iv, any decision to name or rename a school will be made in accordance with Chancellor's Regulation A-860.

With regard to comment 1g.v, because the commenter did not note what type of incentives may close the "achievement gap", the DOE cannot address the comment. Nonetheless, the DOE strives to provide a high-quality education to all students regardless of race or socio-economic status

With regard to comments 2a, 15b, and 15g, the decision to implement a proposal is not made until the Panel for Educational Policy votes on the proposal. The PEP's vote for this proposal will take place on January 19, 2011. Pursuant to Chancellor's Regulation A-190, the proposal was published and made available to all impacted families, schools, and communities via the DOE's website on December 3, 2010. In addition, the proposal was published on the DOE website and filed with each of the impacted school's School Leadership Team. The proposal was also made available in each of the impacted schools' main offices and mailed to the Community Education Council for District 15, the Citywide Council on High Schools, the Citywide Council on Special Education, the Citywide Council on English Language Learners, all Brooklyn community boards, the community superintendent for District 15, the Brooklyn high school superintendent, and the Panel for Educational Policy. Furthermore, a joint public hearing was also held on January 11, 2011 in regards to this proposal to provide a brief summary of the proposal and to include the community in the decision over whether the proposal should be enacted.

With regard to comment 2c the commenter has not specified what specific type of programs the DOE has failed to give the existing schools, and therefore the DOE cannot address the comment. For more information, however, see the DOE's response to comment 1c for analysis on the distribution of funding to schools.

Comments 3c, 9h, 9i, and 9j do not require responses because they do not affect the proposal.

Comment 4, 8a, 8b, 8c, and 14 are in support of the proposal and do not require a response.

With regard to comment 5, the DOE believes Millennium Brooklyn will be a viable option for the community by meeting a demand for high-quality high school options in Brooklyn, which is currently not being met, as evidenced by the proportion of students from Brooklyn who attend high school in other boroughs. Additionally, the DOE has never made any statements to suggest the other schools in the building are not successful or that they should not or would not be supported.

With regard to comment 6, the PEP vote is anticipated to take place on January 19, 2011. The PEP will address any amendments to the proposal according to procedures set forth in the PEP's By-laws provided at <http://schools.nyc.gov/AboutUs/leadership/PEP/bylaws/default.htm>.

With regard to comment 7a, schools may work together and with the community in a collaborative fashion according to their own discretion.

With regard to comment 7c, the DOE has not proposed to relocate the ALC at this time.

Comments 8a, 8b, and 8c are in support of the proposal and do not require a response.

With regard to comment 9g, the Selective Schools Initiative, of which Millennium Brooklyn is a part, raised private dollars to support the planning and development of each new academically selective high school. Each school is allocated a total of \$500,000 to spend over five years.

With regard to comment 9k and 15m, although there is a sufficient number of high school seats in Brooklyn, the DOE has determined there is a high demand for high-quality seats in Brooklyn, which is currently not being met, as evidenced by the proportion of students from Brooklyn who attend high school in other boroughs.

With regard to comment 9m, the Millennium school in Manhattan is not predominantly Caucasian, rather only 34% of the student population is Caucasian. Data regarding the demographics of the school is provided on the the school's statistics portal, at <http://schools.nyc.gov/SchoolPortals/02/M418/AboutUs/Statistics/register.htm>.

With regard to comment 9n, the desire for this proposal is not referenced directly in the EIS for this proposal. However, based on the proportion of Brooklyn students who attend high school outside of the borough, the DOE has determined that families in Brooklyn are interested in seats at a high-quality high school.

With regard to comment 9o, the proposal to site a new school was made through the Selective Schools Initiative plan, which opens new schools that have screening criteria that can include grades and performance on standardized tests, as well as an interview, a writing sample and a review of attendance. The one exception is Brooklyn Latin, which requires the Specialized High School Admissions Test.

With regard to comment 9p, the DOE strives to provide high quality educational options to all students regardless of race or socio-economic status.

With regard to comment 9q, all schools are mandated to create programs that serve the needs of all students, including students with disabilities. All students with disabilities will receive their mandated services at the existing schools or at the new proposed school in accordance with their Individualized Education Plans.

With regard to comment 15c, the DOE anticipates this proposal will not adversely impact the students of schools currently in the building. This proposal is not the appropriate venue for a discussion of these students needs. Moreover, meeting the needs of these students and siting a new school in the building are not mutually exclusive acts.

With regard to comment 15d, the ASD Nest program is a specialized program for students with Autism Spectrum Disorders (ASD) that is not widely available in other New York City schools. Because there are currently no high schools in Brooklyn that offer comparable programs for students with ASD, siting the ASD program in John Jay Campus as a part of the Millennium Brooklyn proposal would provide a unique educational experience and supportive environment for students with ASD.

With regard to comment 15f, the proposal to co-locate Millennium Brooklyn is not dependent on the DOE's choice of principal for the school. Decisions about school leadership are made following thoughtful consideration and rigorous review of candidates.

With regard to comments 15h and 15j, admission to Millennium Brooklyn would be open to all students who meet selection criteria, regardless of race or socio-economic status. Priority would be given to residents of Brooklyn. The assumption that students in current schools on the John Jay Campus would suffer psychological harm is unfounded.

With regard to comment 15i, as stated in the EIS, if this proposal is approved, the DOE may make capital investments to the building in order increase the capacity of the building by converting obsolete classrooms and performing enhancement projects. These potential investments would benefit all of the schools currently housed in K460.

With regard to comment 15k, the DOE has never made any statements or implied that the existing schools at the John Jay campus are inferior.

Changes Made to the Proposal

No changes in the proposal were made in response to public feedback.