

Public Comment Analysis

Date: November 16, 2011

Topic: The Proposed Two-Year Co-location of a New District Elementary School, Castle Bridge School (06M513), with Existing School P.S. 128 Audubon (06M128) in Building M128

Date of Panel Vote: November 17, 2011

Summary of Proposal

The New York City Department of Education is proposing to open and temporarily site the Castle Bridge School (06M513, “Castle Bridge”), a new DOE choice admissions elementary school that would serve students in kindergarten through fifth grade, in Building M128, located at 560 West 169th Street in Manhattan, in Community School District 6. Castle Bridge would be co-located in M128 with P.S. 128, an existing DOE zoned elementary school that enrolls students in grades kindergarten through five, and also offers a pre-kindergarten program. 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.

This proposal is for a two-year temporary co-location beginning in school year 2012-2013. At the end of this period, the DOE would evaluate the space available at M128 and other buildings in District 6 to identify a permanent location for Castle Bridge. At that time, the DOE would issue a new EIS to propose the permanent location for Castle Bridge.

Castle Bridge is a new choice elementary school that would admit students through a school based application process, with preference to District 6 residents and following Chancellor’s Regulation A-101 for admissions.

Castle Bridge will open with kindergarten and first-grade classes in 2012-2013 and add one grade each year until it serves approximately 180-210 students in kindergarten through fifth grade at full scale.

M128 has the capacity to serve 920 students. In 2010-2011, the building only served 721 students, yielding a utilization rate of just 78%. If this proposal to temporarily site Castle Bridge in M128 were approved, Castle Bridge would be co-located with P.S. 128 for two years. In the first year, 2012-2013, Castle Bridge would enroll approximately 60-70 students (30-35 students in kindergarten and 30-35 students in first grade). Enrollment at P.S. 128 would remain about the same as at present. The total building enrollment would be 696-796 students, and the building utilization rate would be 76-87%. In 2013-2014, Castle Bridge would serve approximately 90-105 students in kindergarten through second

grade, and enrollment at P.S. 128 would continue at about the same level as at present. During that year, total building enrollment would be between 715-825 students, and the building utilization rate would be 78%-90%.

I. Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at building M128 on November 7, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 150 members of the public attended the hearing, and 34 people spoke. Present at the meeting were Community School District 6 Superintendent Elsa Nunez; District 6 Community Education Council (“CEC 6”) President Judith Amaro; CEC 6 Representative Tory Frye; CEC 6 Representative Bryan Davis; P.S. 128 Principal Rosa Argelia Arredondo; P.S. 128 School Leadership Team (“SLT”) Representative Lissette Urena; P.S. 128 SLT Representative Iris Antonetty; New York City Councilmember Ydanis Rodriguez; and Sarah Morgredge, representing New York City Councilmember Robert Jackson.

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

1. *Sarah Morgredge, representing New York City Councilmember Robert Jackson, asserted that:*
 - a. Although M128 is not in Councilmember Jackson’s district, he is interested in this issue as chair of the education committee.
 - b. Councilmember Jackson wrote a letter of support for Castle Bridge in July 2010.
 - c. The councilmember does not approve of co-locations. This is a terrible way to incubate a school and get it started. He believes the school deserves its own home. The Hamilton Heights/P.S. 153 co-location has been very unsuccessful. Students in those schools get recess only once a week and gym only once a week.
 - d. If DOE could implement co-locations successfully, Councilmember Jackson would support them, but that has not been the case.
 - e. The enrollment projections included in the proposal have a very wide range, and Councilmember Jackson does not trust these numbers.
 - f. This district needs more capacity; the instructional footprint is not adequate. New schools are designed generously; co-locations should be equally generous.

2. *Julie Zuckerman, the proposed principal of the Castle Bridge School, asserted that:*
 - a. There is currently very high demand for her current school, Central Park East I, and she wants to open this school to help meet that demand.
 - b. “Progressive education” means mixed-grade classes; students choosing their own projects to work on each day; classes that are inclusive of special needs students; high-level arts education, starting with music; and many opportunities for students to talk in order to practice language skills. The model is very consistent with common core standards.
 - c. There will be two primary differences between CPE I and Castle Bridge: 1. Castle Bridge will have many more Spanish-speaking students. Castle Bridge will prioritize bilingual staff. 2. Castle Bridge has a partnership with the Fortune Society. Children with an incarcerated parent have had the most trouble connecting with school. Castle Bridge will set aside 10% of its seats for these children.

- d. Co-location is a tricky process. Sometimes it just means cutting off programs; other times the new school grows so much it crowds out the other school; sometimes the new school builds new facilities that the other school can't share. Castle Bridge will be different. Castle Bridge will be small—no more than 200 students—so it will not crowd out P.S. 128. Ms. Zuckerman has shared schools as a teacher and as a principal where co-locations have been successful. At Building M013 (where CPE I is located), the schools have collaborated to attract funding to build a playground, a library, and a dance room benefiting all the schools. Collaboration allows schools to provide more to their students than each could on their own.
 - e. It is possible to do co-locations well. Castle Bridge will limit impact on the common spaces, and won't use the cafeteria. There will be other ways to limit impact on common spaces as well, which Ms. Zuckerman looks forward to discussing with Principal Arredondo.
3. *New York City Councilmember Ydanis Rodriguez asserted that:*
- a. He will support the parents in their decision, but he would like to see the parents visit the school and make their own decision. He does not want to see parents make decisions based on anyone else's agenda. Parents are the best people to make decisions about their children's education.
 - b. He supports progressive education and believes that it builds critical thinking and teaches students to use their own resources.
 - c. He wants to see more choices in this community.
4. *P.S. 128 SLT Representative Lissette Urena asserted that:*
- a. She has been at P.S. 28 for 11 years and seen the school overcome and accomplish a lot.
 - b. P.S. 128 doesn't want to fight with Castle Bridge, but they do need to stand up for their rights.
 - c. The DOE believes there is space in the M128 building, but there is not. Teachers have to share rooms, and there are 32 students in each class.
 - d. Castle Bridge will be able to have small classes of 18-20 students, but P.S. 128 has overcrowded classes.
 - e. P.S. 128 provides lots of choices even though it is not a "choice" school, including arts, music, and other programs. It provides differentiated instruction, groups divided by needs, etc. Their students go on to good middle and high schools. P.S. 128 offers all the choices parents want and more.

Comments supporting the proposal

- 5. Several commenters expressed their support for progressive education and their desire to have a progressive option in their community.
- 6. Several commenters noted that because there is no progressive choice in District 6, they have had to leave the community to find the types of schools they want for their children.
- 7. Several commenters noted that Castle Bridge will not be a charter school.
- 8. Several commenters stated that they agree that co-locations are not ideal, but that Castle Bridge will be the best possible neighbor P.S. 128 could have.
- 9. Several commenters described how successful their children have been as a result of progressive education they received in CPE I.

10. Several commenters asserted that P.S. 128 is also a good school, and Castle Bridge will simply provide another option for parents. Castle Bridge is not claiming to be better than P.S. 128, just different.
11. Several commenters noted that different children need different types of educational environments, and Castle Bridge will provide another option to meet those needs.
12. Several commenters asserted that the District 6 community is underserved and needs more options, including Castle Bridge.
13. Several commenters noted that Castle Bridge does not want to push out P.S. 128 or take over the building. It is only a two-year proposed co-location, and Castle Bridge only needs a few rooms.
14. One commenter from the Inclusive Classrooms Project noted that progressive education is not a new concept. They are not here because P.S. 128 is bad, just to provide an additional choice for families. Progressive schools serve all types of learners in one room, integrate the curriculum across subjects, connect learning to the real world, focus on helping students develop their own interests and skills, and maintain high expectations for all students without tracking or leveling. She noted that although co-location is not ideal, the DOE has space challenges and Castle Bridge will be the best possible neighbor.
15. One commenter noted that choices like Castle Bridge are automatically available to parents in other districts and they don't need to fight over space and deal with co-locations. These types of options need to be available to District 6 families as well and that the DOE shouldn't tell parents where to send their children. Parents know what is best for their kids.
16. Several commenters asserted that students at Castle Bridge will be taught to communicate, cooperate and be respectful, which is even more emphasized than academics. That is another reason the co-location will work, because the students will be respectful of P.S. 128 and that this will be a good exercise in respect for both communities.
17. One commenter stated that she is a parent in the community and will be a teacher in Castle Bridge. She agreed that the community needs more pre-kindergarten, but stated that this is not the right place for that fight since pre-kindergarten is not funded by the City. She urged the community to think about the benefits of having Castle Bridge and the importance of choice. She stated that Castle Bridge will be small, the community will have an opportunity to see how well it works, and the community shouldn't fight.
18. One commenter stated that she has worked in District 6 schools and CPE I. She believes adults should model for children how to get along, not fight, and that they can make the co-location work.
19. Several commenters expressed their support for Julie Zuckerman.
20. One commenter stated that he's taught at CPE I for 30 years and sent his children to a similar school in Brooklyn. He noted that Castle Bridge will be an option, not a mandate. Progressive education looks at the whole child. Middle school teachers come to him and say his former students are terrific. They love to read, get excited about math, and are interested and intrigued, even if they don't have the best grades. That is what Castle Bridge will offer. He noted that ELLs also benefit from this type of education because of the rich language experience. Applications are completely open. He wants this education available for every community. He expressed that they can make a co-location work.

Comments opposing the proposal

21. Several commenters asserted that P.S. 128 is a high-quality school that provides a good environment for students and serves the community well.
22. Several commenters stated that they are not opposed to the Castle Bridge School, but they are opposed to the co-location of Castle Bridge in M128. They assert that the space should be used to serve the M128 community.
23. Several commenters stated that P.S. 128 needs more pre-kindergarten classes and that the school has repeatedly applied for more pre-kindergarten classes as well as an expansion to serve grades six through eight and has been denied. These commenters believe the space being proposed for Castle Bridge should instead be used to meet the need for pre-kindergarten and middle school at P.S. 128.
24. Several commenters noted that the P.S. 128 community signed a petition against this proposal.
25. One commenter asserted that the assessment of space in the M128 building does not account for services required for students with special needs.
26. One commenter noted that CPE I received “F” grades on its progress report.
27. One commenter stated that the communication from the DOE is insufficient and that this community is not treated the same way as communities downtown.
28. Several commenters noted that they were misinformed and believed Castle Bridge was a charter school.
29. One commenter noted that even though Castle Bridge is not a charter school, it is still a choice school and he believes they will pick which children they accept (not really a random lottery).
30. One commenter suggested that Castle Bridge wants to move into M128 to serve the families moving to the community because of the hospital nearby, not to serve the community that P.S. 128 serves.

II. Summary of Comments Received via Email

In total, 16 comments were received via email that were supportive of the proposal. The comments cited the following reasons for that support:

31. Several commenters asserted that Castle Bridge will offer a high quality education, including:
 - A progressive model that has strong inclusive classroom programs
 - An education that is project-based
 - An interdisciplinary arts curriculum
 - An integrated community
 - An active, highly vocal curriculum that is beneficial for children’s language acquisition
 - An environment that expects and encourages strong parent involvement
32. Several commenters expressed their support for the strong arts curriculum, including art, music, and dance.
33. Several commenters expressed their appreciation for access to a progressive school like CPE I in their community in District 6.
34. Several commenters noted that they support choice for families and would like to see CPE replications like Castle Bridge continue to open in other districts.

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

Comments 1b, 2a-e, 5-20, and 31-34 are supportive of the proposal, and thus do not require a response.

Co-Locations

With respect to comments 1c-d and 22, co-locations are a critical component to the ability to provide families access to a wider range of school choice than would be possible if each building could house only one school. More than half of our schools are co-located and a third of all buildings house more than one organization. With respect to the Hamilton Heights/P.S. 153 co-location, the 2010-2011 Blue Book indicates the M153 building was at 121% utilization. In contrast, the building utilization of M128 is expected to range between 78-90% in the second year of this proposal, and total enrollment in the building would be lower than P.S. 128 enrollment as recently as 2006-2007.

Enrollment Projections

With respect to comment 1e, student enrollment fluctuates from year to year as families move into or out of their neighborhoods. The projections included in the EIS provide a range for each grade level to show the potential enrollment from either increases or decreases to enrollment at each grade. This is a conservative approach. The total enrollment in the M128 building in each year of the proposed co-location is within the building capacity even at the high end of the enrollment range. In fact, enrollment at P.S. 128 has declined 24% over the past six years:

2006-07	2007-08	2008-09	2009-10	2010-11	2011-12
869	817	782	735	721	652

Source: Audited Registers; October 31, 2011 Unaudited Register

Class Size and Admissions

With respect to comment 4c, there is one 2nd grade class at P.S. 128 with 32 students. Another second grade class has only 27 students. There could be several reasons why the principal has chosen to maintain this difference in class sizes, instead of having two classes of more equal sizes. The total of 59 students could potentially be served in 3 sections of 19-20 students, but the principal has the authority to allocate the budget in consultation with the SLT. Similarly, one class in 5th grade has 29 students, while others have 21 and 23 students respectively.

With respect to comment 4d, Castle Bridge is proposed to have 3 class sections in the first year, with 20-24 students per class. The current average class size for General Education/ICT classes at P.S. 128 is 20 for kindergarten and first grade classes.

With respect to comments 2c and 29, Castle Bridge will follow Chancellor's Regulation A-101 for admissions. This regulation requires that if there are more applicants than seats, the school must use a lottery to admit students within each priority group of applicants. Castle Bridge will give priority to siblings of existing students, first within District 6, then from other districts, followed by District 6 residents, then residents of other districts. Through the relationship with the Fortune Society and recruitment efforts, we would anticipate that students who are impacted by incarceration would be

sufficiently represented in the applicant pool to result in approximately 10% of the student body being impacted by incarceration without any specific admissions preference being provided to these applicants.

With respect to comment 30, any resident of District 6 receives equal priority. Students may come from the immediate area surrounding M128, or from other parts of District 6. This is true for all choice schools within the district.

Alternative uses of space in M128

With respect to comment 23, P.S. 128 already has two sections of full-day pre-kindergarten. There are 3 elementary schools in District 6 that do not currently offer any pre-kindergarten and appear to have the space to do so. In addition, there are 7 elementary schools that offer only half-day pre-kindergarten. Thus, if funding were available for additional full-day pre-kindergarten classes in District 6, there are several schools that would be higher priority to receive that funding over P.S. 128.

Comment 23 also suggests space be used to expand P.S. 128 to serve middle school grades, and that P.S. 128 has applied for this grade expansion and been denied. Currently, District 6 has sufficient middle school seats to serve all students. According to the 2010-2011 Class Size Report, average class sizes in grades 6-8 for General Education and ICT classes was 26 students compared to a target class size of 28 students in middle school. A search of past year proposals for grade expansion did not identify an application for P.S. 128 to expand to middle school in the period from 2008 to present. The decision to approve or deny grade expansion applications is dependent upon several factors beyond the availability of space in the building. There are high quality middle school seats available in the immediate neighborhood of P.S. 128, including M.S. 319 and M.S. 324, both of which have received A's on their progress reports for five consecutive years.

Instructional Footprint

With respect to comments 1f, 4e, and 25, the DOE evaluates space at all schools Citywide according to the Instructional Footprint. Schools may use administrative and resource space to provide related services to students with special needs. P.S. 128 would continue to have rooms in excess of its footprint even in the second year of this proposal, when Castle Bridge serves kindergarten through second-grade students, and thus will have excess space available to use as it determines would best meet the needs of its students.

Communication

With respect to comments 27 and 28, the DOE discussed this proposal with the SLT of P.S. 128 on May, 10, 2011, and also held two parent information sessions at P.S. 128 on October 27, 2011 at 4:00pm, and on October 28, 2011 at 9:00am. These sessions were well-attended and provided an opportunity for any member of the community to ask questions and receive answers from the DOE. Each session lasted one hour, and Spanish translation was provided by the district superintendent.

School Quality

With respect to comment 21, the DOE acknowledges that P.S. 128 has received As and Bs on its annual progress report for the past five years. Co-location proposals are not based on the quality of the school, but on the available space in the building that makes a co-location possible.

With respect to comment 26, Central Park East I has in the past received an F on sub-sections of its annual progress report. It has received the following overall grades over the past five years:

2006-2007	2007-2008	2008-2009	2009-2010	2010-2011
<u>D</u>	<u>B</u>	<u>A</u>	<u>C</u>	<u>C</u>

New school proposals are evaluated using several tools and metrics, including interviews, evaluation of sample lessons, visits to observe teaching and learning at the proposed leader's current school, potential demand for the proposed school, quality reviews, and progress reports. Castle Bridge was approved by the Office of New Schools in 2010-2011.

Petition

With respect to comment 24, the DOE has not received a copy of this petition.

Other comments make positive statements about P.S. 128, general statements about choice, or general information, and do not require a response.

IV. Changes Made to the Proposal

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