

Public Comment Analysis

Date: November 7, 2012

Topic: The Proposed Grade Truncation of I.S. 206 Ann Mersereau (10X206) to a 6-8 School in 2013 2014

Date of Panel Vote: November 8, 2012

Summary of Proposal

I.S. 206 Ann Mersereau (10X206, “I.S. 206”) is an existing zoned middle school located in building X206 (“X206”), at 2280 Aqueduct Avenue, in Community School District 10 (“District 10”). It currently serves students in fifth through eighth grades. I.S. 206 is the only school organization located in X206.

On September 20, 2012, the New York City Department of Education (“DOE”) issued an educational impact statement (“EIS”) describing a proposal to implement a “grade truncation” at I.S. 206 whereby the school will no longer enroll fifth-grade students after the 2012-2013 school year. At the close of the 2012-2013 school year, all fifth-grade students at I.S. 206 who meet promotional standards will be promoted to sixth grade. Those students will have the choice to continue at I.S. 206 or they can participate in the District 10 Middle School Choice process. If an I.S. 206 fifth-grade student does not meet the promotional standards at the conclusion of the 2012-2013 school year and is required to repeat the grade in the 2013-2014 school year, the DOE will seek to place that student in a fifth-grade class at a nearby elementary school. If such a placement is not feasible, the DOE will find an alternative District 10 placement for that student. If this proposal is approved, beginning in September 2013, I.S. 206 will only serve students in sixth through eighth grades.

On November 6, 2012, the DOE issued an amended EIS, which clarifies that P.S. 291 (10X291, “P.S. 291”) is the last K-4 school in the district and I.S. 206 is the last 5-8 school in the district. The previous EIS noted that P.S. 291 and I.S. 206 were the only two misaligned schools in District 10; however this is not the case, as other schools in District 10 serve irregular grade spans such as K-2 and K-6. Additionally, the amended EIS includes updated building utilization information as per the release of the 2011-2012 Enrollment Capacity Utilization Report (“the Blue Book”).

Under this proposal, changing I.S. 206’s s grade span from fifth to eighth grades to sixth to eighth grades will not significantly decrease the school’s enrollment because the school’s administration has elected to add a choice program to offer to grades six through eight. This program will be added to the school’s programming at the start of the 2013-2014 year and will phase into the school each subsequent year,

allowing the school to have enrollment at the completion of the 2015-2016 school year which is comparable to its current enrollment.

Middle schools typically enroll students beginning in sixth grade, but I.S. 206 begins serving students in fifth grade. Thus, I.S. 206, as it is currently configured, is not aligned with the majority of other middle schools in the district, which serve sixth through eighth grade students. With the exception of the New Children's School (10X023) – which will serve grades K-5 at the start of the 2013-2014 school year – P.S. 291 is the only remaining K-4 school. I.S. 206 is the only remaining 5-8 school in District 10. Thus, currently, I.S. 206 and P.S. 291, are among the minority of DOE schools in District 10 that serve irregular grade spans in the K-8 realm.

In a separate EIS, posted on September 20, 2012 and amended on November 6, 2012, which can be found at the DOE Web site at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Nov2012Proposals>, the DOE is proposing to expand P.S. 291 from a kindergarten through fourth-grade school to a kindergarten through fifth-grade school. These proposals are complementary, as P.S. 291 mainly feeds into I.S. 206. As it stands, students who graduate from P.S. 291 at the end of fourth grade typically enroll in I.S. 206 for fifth grade and remain for the duration of middle school; otherwise those students would have to attend a new elementary school for fifth grade and then a new middle school for sixth through eighth grades. By aligning P.S. 291 and I.S. 206 with the majority of other schools in District 10, the DOE will maximize the choices available to all District 10 students.

The proposal to expand P.S. 291 to serve fifth grade will result in a net increase of fifth-grade seats in District 10 despite the truncation of I.S. 206, as P.S. 291 will serve more fifth-graders than are currently served by I.S. 206.

As a policy matter, this proposed grade truncation will help standardize middle school application and entry grades in District 10. Additionally, having students start middle school through multiple entry grades creates challenges for students and the school as a whole.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at the X206 building on October 23, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 3 members of the public attended the hearing, one of whom spoke. Present at the meeting were District 10 Community Superintendent Melodie Mashel; Chancellor's Designee Meg Barboza; Community Education Council 10 ("CEC 10") President Marvin Shelton; I.S. 206 School leadership Team ("SLT") representative Principal David Neering; and Stephanie Crane and Henry Smith from the Division of Portfolio Planning.

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

1. Community Education Council 10 President Marvin Shelton expressed concerns about the impact that this proposal would have on middle schools in District 10. He noted that not all middle school students residing in the X291 catchment area are zoned to I.S. 206 and that, as a result of this proposal, I.S. 206 could lose enrollment to schools located on the X115 campus, which would then become overcrowded while the X206 building would be increasingly underutilized.
2. One commenter, a parent of a fifth grade student attending I.S. 206, expressed an interest in her daughter's education, but stated that she mistakenly thought that the hearing was about something else.

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

The DOE did not receive any oral comments through the dedicated phone line for this proposal.

3. The DOE received one written comment through the dedicated Web site for this proposal. The comment was submitted by Community Education Council 10 President Marvin Shelton. Citing Chancellor's Regulation A-185, President Shelton suggested that the proposal must first be approved by the Community Education Council because it involves a change to a school's zone line. He noted that I.S. 206's fifth grade zone is different than its sixth through eighth grade zone. In his view, eliminating the fifth grade at I.S. 206 thus amounts to a change in the defined geographical area for eligibility to attend I.S. 206. As a result, he called for the proposal to be tabled pending the approval of the Community Education Council.

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

Comment 1 expresses concern about the proposal's impact on I.S. 206's enrollment.

Elementary students living in the P.S. 291 zone share an elementary school zone with I.S. 206, which means that P.S. 291 students are zoned to I.S. 206 for fifth grade. However, P.S. 291 elementary students are zoned to the X115 campus for middle school. The X115 campus currently houses the following two middle schools: Academy for Personal Leadership and Excellence (10X363) and East Fordham Academy for the Arts (10X459). Based on the current grade spans of P.S. 291 and I.S. 206, P.S. 291 students generally articulate to I.S. 206 for fifth grade and then remain at I.S. 206 for middle school.

The proposals to expand P.S. 291 and truncate I.S. 206 should not have a long-term impact on I.S. 206's enrollment. As discussed in the amended EIS, I.S. 206's administration has elected to add a choice program to offer to grades six through eight. This program will be added to the school's programming at the start of the 2013-2014 year and will phase into the school each subsequent year. At the completion of the 2015-2016 school year, I.S. 206's enrollment should be comparable to its current enrollment.

It is further worth noting that the DOE values school choice as a way of improving educational opportunities and increasing access to high quality educational options. As a result of this proposal, students attending P.S. 291 will be better positioned to fully participate in the middle school choice process. These students will still be able to apply to I.S. 206 if they so desire and they will still maintain a guaranteed zoned middle school seat within District 10. In the event that a District 10 middle school building becomes severely over- or under-utilized, the DOE will work to shape additional portfolio proposals to address those utilization issues.

Comment 2 was not related to the proposal.

Comment 3 asserts that this proposal constitutes a change in zone lines, and as such, the CEC and not the PEP must vote to approve the change.

As described above, students in the P.S. 291 zone are currently zoned to P.S. 291 for kindergarten through fourth grades and to I.S. 206 for fifth grade. As a result of this proposal and the concurrent proposal to expand P.S. 291, those students will be zoned only to P.S. 291 for the entirety of kindergarten through fifth grade. The lines defining this zone are not being changed as a result of these proposals and all students living in the zone retain a zoned option for fifth grade. As such, this does not constitute a rezoning and does not require approval by the CEC, per Chancellor's Regulation A-185, available at http://docs.nycenet.edu/docushare/dsweb/Get/Document-13/A-185_1-14-05.pdf.

Changes Made to the Proposal

On November 6, 2012, the DOE issued an amended EIS. The amended EIS clarified that P.S. 291 is the last K-4 school in the district and I.S. 206 is the last 5-8 school in the district. The previous EIS noted that P.S. 291 and I.S. 206 were the only two misaligned schools in District 10; however this is not the case, as other schools in District 10 serve irregular grade spans such as K-2 and K-6. Additionally, the amended EIS includes updated building utilization information as per the release of the 2011-2012 Blue Book.