

Public Comment Analysis

Date: January 28, 2015

Topic: The Proposed Grade Expansion of Central Park East II (04M964) from K-5 to K-8 and Proposed Co-location of Central Park East II's Middle School Grades with P.S. 108 Assemblyman Angelo Del Toro (04M108) in Building M108 Beginning in the 2015-2016 School Year

Date of Panel Vote: January 29, 2015

Summary of Proposal

On December 15, 2014, the New York City Department of Education (“DOE”) issued a proposal to expand Central Park East II (04M964, “CPE II”) and co-locate the school’s additional grades with another school. CPE II is an existing non-zoned district elementary school that serves students in kindergarten through fifth grade and offers a pre-kindergarten program. CPE II is co-located with P.S. 171 Patrick Henry (04M171, “P.S. 171”) in building M171 (“M171”), located at 19 East 103rd Street, New York, NY 10029, in Community School District 4 (“District 4”). P.S. 171 serves zoned elementary students and middle school students in a screened program. P.S. 171 also serves students in two sections of a full-day pre-kindergarten program. This proposal will not impact P.S. 171.

Under this proposal, CPE II will expand to serve students in kindergarten through eighth grade, while retaining its pre-kindergarten program. Due to insufficient space to house CPE II’s middle school grades in M171, the DOE proposes to co-locate CPE II’s new middle school grades with P.S. 108 Assemblyman Angelo Del Toro (“P.S. 108”) in building M108 (“M108”). M108 is also located in District 4, at 1615 Madison Avenue, New York, NY 10029, approximately 0.3 miles north of M171. P.S. 108 serves students in kindergarten through eighth grade, with one section of a full-day pre-kindergarten program. P.S. 108 is a zoned elementary school and has screened admissions for its middle school program.

On December 22, 2014, the DOE amended the EIS to provide corrected and additional school performance and attendance information for CPE II and P.S. 108. In addition, some typographical errors were corrected.

The proposed siting plan will result in a “split-siting,” whereby CPE II’s elementary grades will remain in M171 while the school’s middle school grades will phase into a different building, M108. This school-initiated proposal will enable CPE II elementary students to continue their education in the school through eighth grade. In addition, the co-location of CPE II with P.S. 108 will provide opportunities for the two schools to share resources and collaborate on how best to serve their respective middle school populations in building M108.

CPE II currently enrolls approximately 266 students in kindergarten through fifth grade as well as 18 students in one section of a full-day pre-kindergarten program.

In March 2013, a grade expansion team composed of teachers, parents, staff, and administrators from CPE II as well as Central Park East I (04M497, “CPE I”) submitted a formal application to expand the

grades served by CPE II. CPE I, the sister school of CPE II, is a non-zoned elementary school serving students in kindergarten through fifth grades. CPE I is currently co-located in building M013 (1573 Madison Avenue, New York, NY 10029), also in District 4. As part of the approval process for a grade expansion request, the DOE evaluates a school's instructional capacity to serve the expanded school level by working in close collaboration with the superintendent to develop clear benchmarks focused in multiple areas, including curriculum, instructional leadership, and staff and family engagement, to demonstrate the school's capacity to expand. Based on the broader CPE community's support for this application, as well as CPE II's demonstrated track record of academic achievement, the DOE approved the proposed expansion of CPE II and expects it to provide a strong new middle school option.

If this proposal is approved, pursuant to Chancellor's Regulation A-101, students enrolled in CPE II will have the option to remain at the school through eighth grade. Beginning in the 2015-2016 school year, CPE II will add one grade each year until 2017-2018, when it will reach full scale serving students in kindergarten through eighth grade, while continuing to serve students in its pre-kindergarten program. Students enrolled in CPE I will have first priority for admission to remaining sixth grade seats available at CPE II. Should additional seats be available, other fifth grade students in District 4 will be able to apply to attend middle school at CPE II through the District 4 Middle School Application Process beginning in the 2015-2016 school year.

During the current 2014-2015 school year, the M108 building serves 626 students, yielding a building utilization rate of 80%. If this proposal is approved, when CPE II completes its expansion and reaches full scale in 2017-2018 in M108, the school will serve approximately 150-180 students in sixth through eighth grades. At that time, the building will serve approximately 683-803 students from both CPE II and P.S. 108, resulting in a projected utilization rate of 88%-103%. Although the projected utilization rate may exceed 100%, CPE II and P.S. 108 will receive at least their baseline allocations of space pursuant to the Citywide Instructional Footprint. Moreover, 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. Thus, the DOE believes that there is sufficient space to accommodate CPE II's middle school grades and P.S. 108 in building M108, if this proposal is approved.

The details of this proposal have been released in an amended Educational Impact Statement ("EIS") which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2014-2015/January2015SchoolProposals>.

Copies of the amended EIS are also available in the main offices of CPE II and P.S. 108.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at building M108 on January 23, 2015. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 60 members of the public attended the hearing, and 8 people spoke. Present at the meeting were Alexandra Estrella, District 4 Superintendent and facilitator for the hearing; Grysselle Machicote, P.S. 108 principal and School Leadership Team ("SLT") member; Naomi Smith, CPE II principal and SLT member; Laura Lugo-Rivera, member of Community Education Council 4 ("CEC 4"); and Kia Higgins and Drew Patterson of the DOE's Office of District Planning.

Below is a summary of the comments received:

1. Laura Lugo-Rivera, a representative from CEC 4, asserted that:
 - a. She conferred with both the CPE II and P.S. 108 communities, and the P.S. 108 community expressed concern regarding CPE II's lack of a school uniform policy and the potential negative impact on P.S. 108's enforcement of its current school uniform policy.
 - b. The school communities also expressed concern regarding the use of shared spaces.
 - c. CEC 4 does not have concerns regarding the co-location and believes that CPE II and P.S. 108 can work collaboratively.
2. One commenter, a P.S. 108 parent, stated that:
 - a. One commenter, a P.S. 108 parent, indicated her approval of the P.S. 108 faculty and administration and expressed gratitude for their support over the years.
 - b. She is concerned regarding CPE II's lack of a school uniform policy, indicating that the introduction of the uniform policy at P.S. 108 positively impacted school culture and CPE II students should wear a uniform.
 - c. She expressed concern regarding building safety given the potential increase in the number of middle school students in the building.
 - d. CPE II should work with P.S. 108 families and school administrative staff to enforce existing rules and regulations.
 - e. CPE II and P.S. 108 should operate as one unified organization instead of two separate schools.
3. Multiple commenters stated their general approval of the proposal.
4. Multiple commenters asserted their enthusiasm for the potential collaboration and resource-sharing between CPE II and P.S. 108.
5. One commenter, a current CPE II student, supported the expansion of CPE II, asserting that:
 - a. CPE II should expand to include middle school grades because the school teaches students to read and do math.
 - b. If CPE II students cannot attend middle school at CPE II, they may fall behind.
 - c. As a new CPE II student, the commenter is improving in math and reading because of CPE II teachers.
6. One commenter, a CPE II parent, expressed relief regarding the potential expansion of CPE II, as his student would have the option to continue to attend CPE II through the eighth grade.
7. One commenter, a CPE II parent, explained why he enrolled his student in CPE II, indicating his approval of the school's values, philosophy and model.

The DOE received comment at the Joint Public Hearing which did not directly relate to the proposal. This comment is summarized below.

8. Naomi Smith, principal of CPE II, stated that District 4 previously experienced a significant decline in the school-age population, and as a result, co-locations started in that district years ago.

Summary of Comments Received at the Community Meeting

A community meeting regarding this proposal was held at building M108 on December 17, 2014. At that meeting, interested parties had an opportunity to provide input and ask questions regarding the proposal. Approximately 50 members of the public attended the meeting, and 3 people spoke. Present at the meeting were Alexandra Estrella, District 4 Superintendent and facilitator for the hearing; Gryssele Machicote, P.S. 108 principal and SLT member; Naomi Smith, CPE II principal and SLT member; Laura Lugo-Rivera, member of CEC 4; and Kia Higgins and Drew Patterson of the DOE's Office of District Planning.

Below is a summary of the comments received:

9. One commenter, a P.S. 108 parent, inquired about the rationale for selecting building M108 for the proposed co-location.
10. One commenter inquired about whether the DOE evaluated other schools as potential sites for the proposed co-location.
11. One commenter inquired about the use of shared spaces, particularly the cafeteria.
12. Multiple commenters inquired about CPE II's lack of a school uniform policy and expressed concern about the potential negative impact of CPE II students not wearing uniforms on P.S. 108's school culture.
13. One commenter, a CPE II parent, asserted that CPE II is currently co-located with a school with a uniform policy.
14. One commenter inquired about the potential opportunity for CPE II and P.S. 108 to share resources if they are co-located.
15. One commenter inquired about whether space could be built on top of CPE II's current building to accommodate their new middle school grades.
16. One commenter inquired about whether P.S. 108 would receive additional resources should the proposal be approved.
17. Multiple commenters indicated approval for the proposal and expressed enthusiasm regarding sharing resources.
18. One commenter, a P.S. 108 teacher, asserted that she commutes a long distance to school each day using her personal vehicle and wondered about P.S. 108's parking permit allocation if the school is co-located.
19. Several commenters inquired about CPE II's admissions policy for the middle school grades.

Summary of Additional Written or Oral Comments to the DOE

20. One commenter, a P.S. 108 parent, asserted the following:
- a. CPE II's co-location with P.S. 108 may be disruptive, particularly to P.S. 108's middle school students.
 - b. The commenter inquired about whether building M108 contains sufficient space to accommodate CPE II's middle students as well as P.S. 108 students.
 - c. The commenter inquired about potential conflicts between P.S. 108 and CPE II students.
 - d. The commenter inquired about whether the administrations of both CPE II and P.S. 108 would work collaboratively to ensure student safety.
 - e. The commenter expressed concern regarding the increased number of middle school students in the building.
 - f. The commenter inquired about what security measures would be added if CPE II's middle school grades co-locate with P.S. 108 in building M108.
 - g. The commenter inquired about how CPE II families would engage with the parents and staff of P.S. 108.
 - h. The commenter inquired about whether the CPE II administration would enforce the policies and rules currently implemented at P.S. 108.
 - i. The commenter inquired about whether additional resources would be provided to P.S. 108 students to ensure resource equity between CPE II and P.S. 108.

21. One commenter indicated their approval of the proposal.

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

Comments 1c, 3, 4, 5a-c, 6, 17, and 21 are in favor of the proposal and do not require a response.

Comments 1a, 2b, 12, and 13 relate to CPE II's lack of a uniform policy and the potential impact on P.S. 108's ability to enforce its school uniform policy.

For both co-located and non-co-located district schools, the DOE supports the cultivation and maintenance of school identity and culture that promotes a safe school environment that is conducive to learning. As such, each school organization may elect to implement such policies and procedures as they deem appropriate, including school uniform policies. Currently, P.S. 108 implements a school uniform policy, while CPE II does not. P.S. 108 will continue to be able to enforce its school uniform policy and to promote its current school culture; the DOE does not believe that CPE II's presence in the M108 building will interfere with P.S. 108's ability to do so. Commenter 13 asserted that CPE II is currently co-located with a school that has a uniform policy and that CPE II has not infringed on that school's ability to implement its policy.

Comments 2d-e and 20h are similar to comments 1a, 2b, 12 and 13 but ask more generally about the interplay between each school's rules and policies.

As described above, each school will maintain and implement its own policies as separate school organizations. However, it is expected that each school will be respectful of the other school's policies. The DOE hopes the two schools will work together to enhance the learning experience for all students in the M108 building.

Comments 1b, 11, 15, and 20b relate to the availability and use of space in building M108.

The DOE seeks to fully utilize all of its building capacity to serve students. There are currently hundreds of schools in buildings across the City that are co-located; some of these co-locations involve multiple district schools while others involve DOE and public charter schools sharing space. In all cases, the DOE seeks to provide high quality education. The Citywide Instructional Footprint ("the Footprint") is applied to all schools to ensure equitable allocation of classroom, resource and administrative space.

The Footprint is the guide used to allocate space to all 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. The full text of the Instructional Footprint is available at http://schools.nyc.gov/NR/ronlyres/961D691C-641D-4918-9798-8BA2C0A761FF/0/DOEFootprint_91114newlogo.pdf. The EIS details the number of class sections each school is expected to program each year and allocates the number of classrooms accordingly. If this proposal is approved, space allocations, including room type and location, for each school in the building will be made in consultation with the principals of each school and the Office of Space Planning.

Based on a walkthrough of building M108 and an analysis of available space, both P.S. 108 and CPE II will receive their respective baseline allocations according to the Footprint. In addition, the DOE projects that some excess space may be available for equitable allocation between the schools during and after the phase-in of CPE II's middle school grades in building M108.

With respect to the use of shared spaces, such as cafeterias, libraries, gyms, and auditoriums, the Building Council will collectively determine the final shared space schedule if this proposed co-location is approved by the PEP. Additional guidance regarding the governance of shared space is available at <http://schools.nyc.gov/community/campusgov>.

With respect to commenter 15's question about capital improvements, such as building additions, the DOE's School Construction Authority ("SCA") constructs new schools and manages the design, construction and renovation of capital projects in New York City's public school buildings. The SCA's capital planning process includes creating and updating the DOE's Five-Year Capital Plans to meet the capacity and building improvement needs throughout the city. Currently, there is no funding in the 2015-2019 Capital Plan for such capital improvements in District 4.

Comments 2c and 20c-f relate to school safety.

Pursuant to Chancellor's Regulation A-414, every school/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. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

In addition, the Office of Safety and Youth Development (“OSYD”) will regularly monitor the campus schools’ DOE incident data and the NYPD building crime data for spiking trends. When there is evidence of spikes in incidents and crime, OSYD will schedule a review of the data with representatives from all the co-located schools and follow up with a safety walk or a full comprehensive safety assessment to identify areas of concern and re-establish safety and security systems for the campus, as appropriate. The DOE makes available the following supports to schools relating to safety and security:

- Providing “Best Practices Standards for Creating and Sustaining a Safe and Supportive School,” as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and support to Children’s First Network (“CFN”) Safety Liaisons; and
- Providing professional development and kits for Building Response.

Commenters 2a and 7 expressed their approval of the school administrations of P.S. 108 and CPE II. The DOE commends the P.S. 108 and CPE II communities on their hard work and successes.

Comment 8 is not directly related to the proposal and thus does not require a response.

Comments 9 and 10 relate to the process for identifying buildings for co-locations.

The DOE considers multiple factors when evaluating buildings for potential co-location, such as the availability of space in the building; the building’s configuration; the current and proposed grade levels in the building; building location; as well as school and district community input. For the current proposal, based on these and other factors, the DOE believes building M108 is the best option for the proposed co-location of CPE II’s new middle school grades.

Comments 4, 14, 16, and 20i relate to the opportunity for P.S. 108 and CPE II to share, and perhaps obtain additional, school resources.

Principals have discretion over their budgets and determine how to prioritize their resources. If this proposal is approved, P.S. 108 and CPE II may elect to share resources, such as jointly funding a class or program. To this end, the DOE supports school collaboration and the sharing of resources that collectively benefit all students in the building.

In general, the DOE works with all school organizations in a building to facilitate the creation of safe school environments that are conducive to learning, including maximizing existing resources. Typically, school organizations do not receive additional funding, capital upgrades to buildings, or resources as a result of a new or existing co-location.

Comment 18 relates to the allocation of parking permits. Each academic year, school buildings receive a set number of parking permits from the Department of Transportation. In general, the Department of Transportation determines the permit allocations based on available space outside of the building and not on the number of school organizations in a given building. This means that fewer parking permits may be available for P.S. 108 as a result of this proposal.

Comment 19 refers to the middle school admissions policy for CPE II. If this proposal is approved, CPE II will admit prospective sixth grade students with an unscreened admissions method. Admissions preference for middle school enrollment will be given to students in the following order: continuing fifth grade students from CPE II; fifth grade students from CPE I; and students and residents of District 4.

Comment 20a asserts that the proposed co-location of CPE II's middle school grades with P.S. 108 would be disruptive to P.S. 108's students, particularly the middle school students.

In many buildings where schools are co-located, each school is assigned specific hallways, classrooms, and stairways for students to use. These measures are taken to cultivate cohesive cultures within each school. Separation between schools is intended to limit any issues that might arise from groups of students who may not know each other well and to nurture school unity and if a specific space arrangement is not working or is inadequate, the Building Council may discuss an alternative arrangement.

Comment 20g asks about communication between CPE II families and the P.S. 108 school community.

The DOE encourages communication between the schools, which fosters the development of strong relationships and the formation of a cohesive building community.

Changes Made to the Proposal

No changes have been made to this proposal.