



Public Comment Analysis¹

Date: March 8, 2013

Topic: The Proposed Opening and Co-location of a New Elementary School (19K557) and a New Middle School (19K663) with Existing School P.S. 174 Dumont in Building K174 Beginning in 2013-2014

Date of Panel Vote: March 11, 2013

Summary of Proposal

On January 22, 2013, the New York City Department of Education (“DOE”) posted an Educational Impact Statement (“EIS”) proposing to co-locate a new zoned elementary school (19K557, “New Elementary School”) and a new middle school (19K663, “New Middle School”) in building K174 located at 574 Dumont Avenue, Brooklyn, NY 11207, in Community School District 19 (“District 19”). If this proposal is approved, New Elementary School and New Middle School will be co-located in building K174 with P.S. 174 Dumont (19K174, “P.S. 174”), an existing school that currently serves kindergarten through eighth-grade students. P.S. 174 serves zoned kindergarten through fifth-grade students, while sixth-through eighth-grade students are admitted through the District 19 Middle School Choice Process, offering priority to continuing fifth-grade students. P.S. 174 also offers a full-day pre-kindergarten program.

On January 31, 2013, the EIS was amended to include P.S. 174’s most recent Quality Review, which occurred on October 24, 2012 and October 25, 2012. P.S. 174 is the only school organization in building K174.

In a separate amended EIS published on January 31, 2013, the DOE has proposed to gradually phase-out and eventually close P.S. 174 because of its poor performance and inability to improve quickly to better support student needs. If this proposal is approved, P.S. 174 will be phased out gradually over the next several years and will no longer admit new kindergarten, first-grade, second-grade, or sixth-grade students at the end of this school year. Additionally, after the end of this school year, P.S. 174 will not offer its pre-kindergarten program. In 2013-2014, P.S. 174 will only serve students in third, fourth, fifth, seventh, and eighth grades; in 2014-2015, P.S. 174 will only serve students in fourth, fifth, and eighth grades; in 2015-2016, P.S. 174 will only serve students in fifth grade. P.S. 174 will close in June 2016.

New Elementary School will open in K174 as a zoned district elementary school, serving the same zone as P.S. 174. In the 2013-2014 school year, New Elementary School will serve the kindergarten, first-, and second-grade students who would otherwise have attended P.S. 174 if it were not being phased-out. New Elementary School will also offer a pre-kindergarten program. New Elementary School will then expand

¹ The DOE will continue to accept comments concerning this proposal up to 24 hours prior to the Panel for Educational Policy’s (“PEP”) vote on March 11, 2013. Those additional comments will be addressed in an amended Public Comment Analysis which will be provided to the PEP before it votes on this proposal.

by one grade each year until it reaches full scale and serves students in kindergarten through fifth grade in 2016-2017.

New Middle School will also open in K174 and will admit students through the District 19 Middle School Choice Process with a limited unscreened admissions method. For the 2013-2014 school year, New Middle School will offer priority to continuing P.S. 174 fifth-grade students. For the 2014-2015 school year and beyond, this priority will no longer exist. If this proposal is approved, New Middle School will begin enrolling sixth-grade students in 2013-2014 and will add one grade per year until it has reached full scale and serves students in sixth through eighth grades in 2015-2016.

During the years that P.S. 174 is phasing-out, New Elementary School, New Middle School and P.S. 174 will be co-located in K174. Once P.S. 174 has completed its phase-out, New Elementary School and New Middle School will be the only schools in K174.

According to the 2011-2012 Enrollment, Capacity, Utilization Report (“Blue Book”), K174 has a target capacity of 740 students, but in 2012-2013 the building is serving only 441 students, yielding a building utilization rate of 60%. In 2016-2017, once P.S. 174 has completed its phase-out and New Elementary School and New Middle School have reached full scale, it is projected that there will be approximately 476-566 students served in K174, thereby yielding an estimated building utilization rate of approximately 64%-76%.

If this proposal is approved, New Elementary School and New Middle School will replace the elementary and middle school seats that will be lost as a result of the phase-out and eventual closure of P.S. 174 and will provide new educational options for families in District 19.

The details of this proposal have been released in an amended EIS which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Mar112013Proposals.html>. Copies of the EIS are also available in P.S. 174’s main office.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at building K174 on February 22, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 90 members of the public attended the hearing and 12 people spoke. Present at the meeting were: Deputy Chancellor Kathleen Grimm; Principal Ingrid Mason; P.S. 174 School Leadership Team (“SLT”) Representatives Colleen Parks and Anita Brown; District 19 Community Superintendent Joyce Stallings-Harte; Chief of Staff Joy Simmons on behalf of Councilmember Charles Barron; and Representatives from the DOE’s Division of Portfolio Planning, Lily Haskins and Gabrielle Wyatt. The District 19 Community Education Council (“CEC 19”) was invited to attend and confirmed that a representative would be in attendance; however, no representative attended the hearing.

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

1. Colleen Parks, representative from the SLT, stated the following:
 - a. The DOE says P.S. 174 is a struggling school that cannot turnaround quickly; we disagree.
 - b. When Principal Mason began at P.S. 174, only 18% of students were on grade level. Now we are at 50% proficiency.
 - c. P.S. 174 had the second highest gain in the district in 2010-2011.
 - d. P.S. 174 has been a well-developed school consistently.
 - e. We are being identified as a Focus school based on one year of data.

- f. We are doing everything we can to move these students, including adopting the Common Core, implementing the Danielson Framework, and using benchmark assessments throughout the year.
 - g. The DOE has not given us any help over the last 10 years. Instead, the DOE has taken away our funding and programming. We have to seek out these things on our own.
 - h. Our Quality Review appeal was denied this year because the DOE says we do not have a system to communicate with parents; however, we communicate in several ways to parents.
 - i. Why is our phase out based on one year of data?
2. Anita Brown, representative from the SLT, stated the following:
 - a. The phase out is unfair and unjust.
 - b. The DOE promised to help us stay afloat during early engagement. The DOE promised they would give us a projected program.
 - c. We've been a well-developed school every year and the one year we are not, we're phased out.
 - d. We have a lot of great programs because of Principal Mason, not the DOE who did not give us funding.
 - e. P.S. 174 has been a good standing school for many years. How can the DOE phase us out?
 - f. The Quality Review appeal was denied; however, the Quality Review was inaccurate because we do a lot with our parents.
 - g. Why shut down a system that is working well?
 - h. It is unfair to phase out a school because of one letter grade.
 - i. The DOE wants to bring in another school and take away funding from us.
 - j. We want funding for after school programs and tutoring.
 - k. What can the new school do that we're not doing now? The new school will not change the outcome.
 - l. Principal Mason is doing very well. Let her continue.
 - m. We have students with special needs here and with the new tests, our scores dropped.
 - n. Other schools have been allowed time to improve, give us the chance.
 3. Chief of Staff Joy Simmons, on behalf of Councilmember Charles Barron, stated the following:
 - a. Charles Barron is on the side of parents and teachers who speak in favor of keeping P.S. 174 together.
 - b. The DOE cannot convince intelligent people that phase out is the right decision. A good school takes resources, labs, technology, a culturally relevant curriculum, and highly trained teachers. We have that here.
 - c. Our office has had successes when parents organize. We need organized action in order to stop this decision.
 4. Multiple commenters stated P.S. 174 is not failing and doing the best it can.
 5. Several commenters stated there is a lack of parent involvement at P.S. 174 and that is why the school is underperforming.
 6. Several commenters stated disappointment in the lack of community members attending the hearing.
 7. Several commenters stated more programs should be placed in the school rather than phasing out P.S. 174.
 8. Several commenters expressed appreciation for P.S. 174's staff, including the school's leadership, and questioned the DOE's decision to phase out the school.
 9. Several commenters were uncertain about the replacement plan for P.S. 174 and what happens to currently enrolled students.
 10. Several commenters stated students come from low income and displaced homes in East New York; therefore it is unfair for the DOE to compare P.S. 174 to other schools.
 11. One commenter stated it was unfair to replace P.S. 174 with a charter school.
 12. One commenter stated it was unfair for the DOE to take funding away from P.S. 174 and give to the new schools.

13. Several commenters stated the DOE underfunds P.S. 174 and asked for funding to be restored.
14. Several commenters questioned whether the new schools would make a difference.
15. One commenter stated there is no criteria for phasing out schools.
16. One commenter stated P.S. 174's 92% attendance rate is an indicator the school can quickly turnaround.

The DOE received a number of comments at the joint public hearing which do not directly relate to the proposal, and therefore will not be addressed. Those comments are summarized below.

17. Anita Brown, representative from the SLT, stated the process is a political ploy.
18. Chief of Staff Joy Simmons, on behalf of Councilmember Charles Barron, stated Mayor Bloomberg is about the bottom line, not students. The administration is playing games across the City.
19. One commenter stated the Bloomberg administration warehouses students in low performing schools.

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

20. The DOE received several written comments about how P.S. 174 teachers are hardworking and devoted.
21. The DOE received several written and oral comments stating P.S. 174 should be given another chance.
22. The DOE received multiple written and oral comments stating phasing out P.S. 174 will not solve any problems.
23. The DOE received several written and oral comments stating that when the DOE cut funding to P.S. 174, performance decline. The DOE should restore P.S. 174's funding and resources.
24. The DOE received a written comment stating the DOE should not privatize P.S. 174.
25. The DOE received an oral comment stating the DOE should bring back the theater program at P.S. 174.
26. The DOE received several written and oral comments stating P.S. 174 should not be closed.
27. The DOE received an oral comment stating there should be a leadership change at P.S. 174 rather than the proposed phase out.
28. The DOE received an oral comment requesting that the DOE not replace P.S. 174 with a charter school.

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

Comments 1 (a, b, c, d, e, f, g, h, i), 2 (b, c, d, e, f, g, h, j, l, m, n), 3(b), 4, 5, 7, 8, 10, 13, 15, 16, 20, 21, 23, 25, and 26 concern the proposed phase out of P.S. 174 and are addressed in the corresponding public comment analysis.

Comment 9 inquires about the proposed replacement of P.S. 174.

As noted in the EIS describing this proposal, New Elementary School will begin enrolling kindergarten through second grade students in 2013-2014 and will add one grade per year until it is at full scale and serves students in kindergarten through fifth grade in 2016-2017. New Elementary School will also offer a pre-kindergarten program beginning in 2013-2014. New Middle School will begin enrolling sixth grade students in 2013-2014 and will add one grade per year until it reaches full scale and serves students in sixth through eighth grades.

If the proposals are approved:

- Current pre-kindergarten students at P.S. 174 will have priority for kindergarten admissions at the new elementary school in 2013-2014.
- Current kindergarten and first-grade students at P.S. 174 will be enrolled in the new elementary school.
- Current second-, third-, and fourth-grade students at P.S. 174 will continue to be enrolled in P.S. 174.
- Current fifth-grade students will have the opportunity to graduate from P.S. 174 at the end of this school year. These students should have already applied to middle school, but in addition may apply to the proposed new middle school during the new schools round of the Middle School Choice process this spring.
- Current sixth- and seventh-grade students will move on to the next grade at P.S. 174 in September 2013; these students can remain at P.S. 174 through their eighth-grade graduation, assuming they meet promotional requirements.
- Current eighth-grade students will have the opportunity to graduate from P.S. 174 at the end of this school year and should have already applied for high school through the Citywide High School Admissions process.

While P.S. 174 is phasing out, there may be students who do not meet promotional standards and are required to repeat a grade that P.S. 174 will no longer serve. If this is the case, these students will be enrolled in the new elementary school or new middle school. Students may also apply to finish school elsewhere if they wish.

As part of our Public School Choice Process, current students at P.S. 174 will have the opportunity to apply to transfer to another middle school for the 2013-2014 school year. Applications for these transfer opportunities will be available to students this spring, for enrollment starting in September 2013.

Comments 11, 24, and 28 concern the type of new schools replacing P.S. 174.

Commenter 11 is incorrect, the DOE is not replacing P.S. 174 with a public charter school. Similarly, commenter 24 is inaccurate; the DOE is not privatizing P.S. 174. The DOE has proposed to phase out and replace P.S. 174 with a zoned district elementary school and a district middle school.

Comments 2 (a) and 3 (a) state general opposition to the proposal.

While some members of the P.S. 174 community object to the possibility of phasing out the school, the DOE is committed to providing a portfolio of high quality school options to students and families. The DOE believes that phasing out and replacing P.S. 174 is the best option for future students and the broader community.

While some members of the P.S. 174 community objected to the possibility of phasing out the school, the DOE believes that drastic action must be taken, given the school's performance struggles and the lack of evidence that the school is poised to quickly turn around to better support students. The DOE plans to incorporate community feedback as it continues to support current P.S. 174 students working toward elementary school completion, and develops plans to replace P.S. 174 with a new school that the DOE believes will better meets student and community needs.

Comments 2 (i) and 12 concern the funding of schools as they phase out and replacement schools phase in.

As stated in the EIS, If this proposal is approved, once the phase-out of P.S. 174 is fully implemented, the DOE would cease to allocate funds to P.S. 174 and repurpose all remaining funds previously allocated to the school.

Most funding in schools' budgets is allocated on a per-pupil basis, based on current Fair Student Funding ("FSF") per capita allocation levels, which are subject to annual variation. FSF covers basic instructional expenses and FSF funds may, at the school's discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs.

As a result of the phase-out, the total number of students enrolled at P.S. 174 will decline each year, meaning that the school's budget will decrease each year, and the school will need fewer teachers and fewer supplies to meet the needs of its smaller student population. If for some reason the overall school enrollment grows again, the overall budget will increase accordingly. In any case, funding will be provided in accordance with enrollment levels, allowing the school to meet the instructional needs of its student population. This is how funding is awarded to all schools throughout the City, with budgets naturally increasing or decreasing as enrollment fluctuates from year to year.

Please refer to the FSF Guide and FY13 School Allocation Memoranda for additional information on cost of instruction and how the changes to FSF funding and other school allocations will be impacted as a result of register changes at P.S. 174. The FSF Guide is available at: http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy12_13/FY13_PDF/FSF_Guide.pdf. The FY13 School Allocation Memoranda is available at: http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy12_13/AM_FY13_CAT.html Staffing changes are at the discretion of the school within the limits of contractual and mandated obligations.

New schools receive Fair Student Funding in the same manner as other schools. Funding follows the students and is based on pupil academic needs (i.e., special education, ELL, poverty, and/or proficiency status). New district schools are provided with additional funds to cover start-up costs such as supplies and textbooks that may be required. This Other than Personal Services (OTPS) for new schools funding allocation is based on a fixed per-school amount, and a per-pupil allocation. A new school in year one of implementation at a newly constructed site will receive \$22,000 and a new school in a newly leased or existing site will receive \$51,000 in OTPS per school. Thereafter, the school will receive \$100 per-student in OTPS based on projected registers for the newly added grade. In the case where there is no new grade phasing-in, the school will not receive an allocation in that year.

Principals have discretion over their budget and make choices about how to prioritize their resources. New schools may choose to hire fewer administrative staff (e.g. only a single assistant principal) freeing up dollars to be directed toward other priorities.

Comments 2 (k) and 14 question whether the new schools will perform better than P.S. 174

The DOE believes that closing a struggling school and opening a new school with new leaders and staff is a successful strategy to provide all students with an excellent education. To ensure that as many students as possible have access to the best possible education, under this Administration New York City has replaced 142 of our lowest-performing schools with better options and opened 576 new schools: 427 districts schools and 149 public charter schools. The new schools have out performed schools in phase out both in ELA and Math in grades three through eight by wide margins. In ELA, new schools had 14.2 percentage points higher proficiency than schools in phase out, with 37.7% proficient in new schools and only 23.5% in schools in phase out in 2012. In Math, new schools had 23.2 percentage points higher

proficiency than schools in phase out, with 50.8% proficient in new schools and only 27.6% in schools in phase out in 2012.

Comment 3 (c) states parents should organize in order to stop the decision.

The DOE appreciates all feedback from the community regarding a proposal. When the EISs were issued, they are made available to the staff, faculty and parents at P.S. 174, on the DOE's Web site, and in each school's respective main office. In addition, the DOE dedicates a proposal-specific website and voicemail to collect feedback on this proposal. Furthermore, all schools' staff, faculty and parent communities are invited to the Joint Public Hearing to provide further feedback.

Comment 6 states disappointment in the lack of community members in attendance at the joint public hearing.

As noted previously, the school's staff, faculty and parent communities were invited to the Joint Public Hearing to provide further feedback.

Comment 22 asserts the strategy of phasing out schools does not work.

The central goal of the Children First reforms is simple: to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school – led by a dedicated leader with a vision for student success.

To ensure that as many students as possible have access to the best possible education, under this Administration, New York City has replaced 142 of our lowest-performing schools with better options and opened 576 new schools: 427 district schools and 149 public charter schools.

As a result, we've created more high-quality choices for families. ELA and math proficiency levels at new schools are higher than the schools they replaced.

As stated above, the new schools have outperformed schools in phase out both in ELA and Math in grades three through eight by wide margins.

Our new schools are overwhelmingly getting the job done for students, and when they are not, and a school is struggling, we follow the same process to phase out and replace that school.

Changes Made to the Proposal

No changes have been made to this proposal.