Department of Education
Dennis M. Walcott, Chancellor

Amended Public Comment Analysis[1]

Date: March 10, 2013

Topic: The Proposed Opening and Co-location of New High School 24Q236 with Newtown High School (24Q455) in Building Q455 Beginning in 2013-2014

Date of Panel Vote: March 11, 2013

Summary of Proposal

On January 18, 2013, the New York City Department of Education ("DOE") issued an Educational Impact Statement ("EIS") describing a proposal to open and co-locate 24Q236, a new International High School, at the Newtown High School Campus in school building Q455 ("Q455") located at 48-01 90th Street, Queens, NY 11373, within the geographical confines of Community School District 24 ("District 24"). International schools are designed to provide quality education for recently arrived immigrant students through a unique educational model, which will offer rigorous academic programming to prepare English Language Learner ("ELL") students for post-secondary college and careers. If this proposal is approved, 24Q236 will be co-located in building Q455 with Newtown High School (24Q455, "Newtown"), an existing high school that serves grades nine through twelve. 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.

On February 14, 2013, the DOE issued an amended EIS which clarified that the planned enrollment reduction will impact Newtown's admissions priorities and not Newtown's admissions methods, and provides updated information regarding the change in Newtown's admissions priorities. The amended EIS also specifies changes to available ninth-grade seats at Newtown.

In consultation with the school's leader, cluster, network support, and community, the DOE is planning to reduce the enrollment at Newtown over a period of four years beginning in September 2013. By 2016-2017, enrollment at Newtown will decrease by approximately 304-344 students so that it will serve 1,910–1,950 students at scale in ninth through twelfth grades. This reduction of Newtown's enrollment will create additional space for 24Q236 to open in Q455. The DOE does not anticipate reducing Newtown's enrollment if this proposal to co-locate 24Q236 is not approved.

The proposed co-location of 24Q236 in building Q455 is part of the DOE's central goal to create new school options that will better serve future students and the community at large and to provide another option in the Q455 building. 24Q236 will be a screened International High School that will serve approximately 300-340 students at scale in ninth through twelfth grades and give priority to Queens' residents who have lived in the United States for four years or fewer at the time of admission to high

[1] An initial public comment analysis for this proposal was posted on March 8, 2013; an amended public comment analysis was posted on March 10, 2013 to reflect additional comments received after 6:00 p.m. on March 8, 2013 and before 6:00 p.m. on March 10, 2013. The DOE has responded to these new comments and has also clarified certain other responses.

school and whose home language is not English.

According to the 2011-2012 Enrollment Capacity Utilization Report ("Blue Book"), building Q455 has a target capacity of 2,396 students.[2] In 2012-2013, the building serves approximately 2,254 students,[3] yielding a building utilization rate of 94%.[4]

If the co-location proposal is approved, 24Q236 will gradually phase into Q455 while Newtown simultaneously scales back its enrollment. The new school will serve students in ninth grade in the 2013-2014 school year and will add one grade level every year until the school reaches its full grade span of ninth through twelfth grades in the 2016-2017 school year, serving approximately 300-340 students. In 2016-2017, once Newtown has completed its enrollment reduction and 24Q236 has reached full scale, it is projected that there will be approximately 2,210–2,290 students served in Q455, yielding an estimated building utilization rate of approximately 92%-96%.

Summary of Comments Received

A joint public hearing regarding this proposal was held at building Q455 on February 27, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. While representatives from the Citywide Council for Special Education, Citywide Council on High Schools, and Citywide Council for English Language Learners were invited, not all chose to participate in the hearing. Approximately 191 members of the public attended the hearing and 42 people spoke. Present at the meeting were: Queens High Schools Superintendent Juan Mendez; Community Education Council ("CEC") 24 member Maria D'Amico; John Ficalora, Principal of Newtown High School; SLT representatives from Newtown, Chris Sias and Jennifer Schneider; Helen Marshall, Queens Borough President; Joel Trinidad Santos representing Council Member Julissa Ferraras; Don Capalbi representing Assembly Member Grace Meng; and Sebastian McGuire representing Council Member Daniel Dromm; and Savita Iyengar and Emily Ades from the DOE's Office of Portfolio Management.

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

1. Deborah Martinez, President of the Parent Teacher Association ("PTA"), expressed her opposition to the proposed co-location of 24Q236 with Newtown:
    a. She stated that there has been progress at Newtown.
    b. She stated her opposition to sharing facilities with another school.
2. Queens Borough President Helen Marshall read a letter to Chancellor Walcott expressing opposition to the co-location of 24Q236 with Newtown:
    a. She stated that the new school will be screened and may not serve members of the community.
    b. She stated that Newtown has exceptional programs that are effective with the International students.
    c. She stated that Newtown has shown progress and received a "B" rating and has a graduation rate of 68%.

[2] 2011-2012 Enrollment, Capacity, Utilization, Report (the "Blue Book").
[3] 2012-2013 Unaudited Register (as of October 26, 2012).
[4] All references to building utilization rates in this document are based on target capacity data from the 2011-2012 Blue Book and enrollment data from the 2012-2013 Unaudited Register (as of October 26, 2012) or charter headcount as of October 1, 2012. This methodology is consistent with the manner in which the DOE conducts planning and calculates space allocations and funding for all schools. In determining the space allocation for co-located schools, the Office of Space Planning will conduct a detailed site survey and space analysis of the building to assess the amount of space available in the building.

   d. She stated that the co-location will cause over-crowding at Newtown.
3. Sebastian McGuire representing Council Member Daniel Dromm read a statement from the Council Member that expressed opposition to the co-location of 24Q236 with Newtown:
   a. He stated that the school has shown improvement and that a co-location may deter Newtown from further success.
   b. He stated that he drafted a moratorium on co-locations citywide.
   c. He stated that additional resources should be given to Newtown.
4. SLT Member Chris Sias made a presentation that expressed opposition to the co-location of 24Q236 with Newtown:
   a. He provided information about the progress at Newtown including the facts that the school improved from a "C" on the overall progress report to a "B" on the overall progress report; the attendance rate has increased to 85%; the graduation rate increased from 62% to 68%.
   b. He cited the successful programs at Newtown and said that if enrollment is reduced, fewer students will have access to these programs.
5. SLT Member Jennifer Schneider expressed opposition to the co-location of 24Q236 with Newtown:
   a. She cited that Newtown is not a screened school and accepts all students whereas 24Q236 will turn students away.
6. Multiple commenters stated that Newtown has been improving and that they are against the co-location.
7. Multiple commenters expressed confusion about why the DOE is proposing to open an International School at Newtown.
   a. Multiple commenters stated that Newtown has a large international population and already serves the ELL students well.
   b. Multiple commenters suggested that the new school should be opened in an alternate location where there is more space.
8. Multiple commenters expressed the challenges of sharing space in the building.
   a. One commenter discussed the impact a co-location has on school culture.
   b. One commenter stated that the new school will have more and better resources than Newtown.
9. Several commenters expressed concerns that programs at Newtown will be cut due to a shared space schedule that limits time in the auditorium, lunchroom and gymnasium.
10. Multiple commenters stated that there are already schools serving the ELL population in the neighborhood.

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

11. The DOE received multiple calls and written comments expressing the opposition to the co-location at Newtown.
    a. One commenter stated that reducing the enrollment at Newtown will cause a shortage of seats in Queens High Schools.
    b. Multiple commenters expressed that Newtown has improved and reducing enrollment may decrease the amount of electives or programs that the school can offer.

   c. Multiple commenters were concerned about the impact sharing space may have on Newtown's improved performance.
   d. One commenter expressed concern about the cost of the new school.
12. Former Council member Melinda Katz submitted a letter expressing the following concerns:
   a. Reducing the enrollment at Newtown will reduce funding and necessary resources for Newtown.
   b. Newtown has improved and burdening it with a co-location is not a good plan.
   c. Charter schools cannot come at the expense of space or limited resources dedicated to public schools.
13. Assembly member Catherine Nolan submitted a letter expressing opposition to reducing the enrollment at Newtown:
   a. She referenced her opposition to turnaround.
   b. She expressed her support for comprehensive high schools, stating that the comprehensive high school experience is undervalued.
   c. She asserted that reducing the enrollment and therefore resources at Newtown is not a good plan.
14. State Senator Jose Peralta submitted a letter commending the plan to add a new school to serve ELL students in Queens but expressing opposition to siting the school at Newtown due to the progress that the school has made.
15. Assembly member Jeffrion Aubrey submitted a letter objecting to co-location at Newtown.
   a. He stated that Newtown has improved and received a "B" on the most recent Progress Report and has a 68% graduation rate.
   b. He stated his support for Newtown as a diverse community High School.
   c. He stated that Newtown needs more resources.

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

- Comments 1(a), 2(c), 3(a, b, c), 4(a), 6, 12(b), 14 and 15(a, c) express general opposition to the proposed co-location in terms of the fact that Newtown's performance has improved and more time and resources are needed.

  The DOE works to ensure that students and families in every community have high-quality educational options. In an effort to increase choice and access to high-quality educational options, but due to space limitations, roughly half of our schools share space in a building. Co-locations allow us to use our limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because we have scarce resources and a demand for more options. Many school buildings successfully house co-located schools.

  At this time, the DOE believes that reducing the enrollment of Newtown beginning in September 2013 and providing a new option for high school students in the Q455 building will benefit current and future students at both Newtown and in Queens. The enrollment reduction is intended to provide an opportunity for students currently attending Newtown to improve by narrowing the

focus to a smaller number of students, while offering a high-quality option to serve the ELL population.

The DOE believes that the District 24 community and Queens as a whole will benefit from having an additional option in the Q455 building.

The DOE commends and acknowledges the students and staff at Newtown for their hard work and for creating a positive change in the school. However, the DOE believes that the students in this community would be well-served by an additional school option. Although Newtown received a B grade on its overall progress report, the school's graduation rate has been between 53-68% for the past five years. Further, in August, 2012, Newtown was identified by the State Education Department ("SED") as a priority school, defined by NYSED as one of the bottom 5% of schools in the state. As a result, the DOE believes that it is important to provide another option to students now.

Newtown will continue to receive funding based on per pupil allocations weighted based on students' grade level and need. Newtown will also continue to receive leadership, instructional, operational and student supports to help improve educational outcomes and student achievement. Additionally, the enrollment reduction is intended to provide an opportunity for students currently attending Newtown to improve by narrowing the focus to a smaller number of students, while offering a high-quality option to serve the ELL population.

- Comments 1(b), 2(d), 9, and 11(c) express support for Newtown as one school in one building and concern regarding overcrowding, scheduling, and sharing common spaces such as the library, gymnasium, and cafeteria; and comment 7(b) suggests that the new school should be opened in an alternate location where there is more space.

Roughly half of our schools share space in a building. Co-locations allow us to use our limited facilities efficiently while simultaneously creating additional educational options for New York City families. This is necessary because we have scarce resources and a demand for more options. With regard to concerns about how co-locations impact shared spaces such as the library, gymnasium, and cafeteria, specific decisions regarding the allocation of the shared spaces will be made by the Building Council, consisting of principals from all co-located schools, in conjunction with the DOE's Office of Space Planning. The Office of Space Planning will also work with Newtown to ensure a smooth transition, if necessary, of any rooms currently being used by Newtown. Currently, building Q455 has adequate space pursuant to the Citywide Instructional Footprint (the "Footprint") to accommodate Newtown. If this proposal is approved, building Q455 will continue to serve the same number of students as it currently serves, while Newtown undergoes a targeted enrollment reduction and 24Q236 phases in.

In reference to locating 24Q236 in an alternate location, according to the 2011-2012 Enrollment Capacity Utilization Report ("Blue Book"), building Q455 has a target capacity of 2,396 students. In 2012-2013, the building serves approximately 2,254 students, yielding a building utilization rate of 94%. In 2016-2017, once Newtown has completed its enrollment reduction and 24Q236 has reached full scale, it is projected that there will be approximately 2,210–2,290 students served in Q455, yielding an estimated building utilization rate of approximately 92%-96%.

Therefore, the DOE anticipates that there will be sufficient space in building Q455 to accommodate both school organizations. Finally, in the 2012-2013 school year, Newtown is comprised of 32% ELL's students, which is significantly higher than the district percentage at 22% and Queens overall at 14%. Therefore, the DOE believes that the unique educational model of 24Q236, which will provide recently-arrived immigrant students with rigorous academic programming to prepare ELL's students for post-secondary college and careers, will benefit the community in this location.

- Comments 4(b), 11(b), 12(a), and 13(c) concern the proposal to decrease enrollment at Newtown and the impact it may have in a reduction of programs offered. Comment 8(a) concerns the impact of this proposal on school culture. Comments 13(b) and 15(b) express support for diverse comprehensive high schools. Comment 11(a) expresses concerns about the impact the enrollment reduction will have on the High School seat need in Queens.

  With respect to academics, all current students can remain at Newtown, as the school will continue offering all necessary classes to support current students as they work to meet graduation requirements and earn their high school diplomas. As total enrollment at the school declines throughout the course of the enrollment reduction, the school may need to scale back its elective course offerings. It is difficult to predict how those changes might be implemented, as decisions will rest with school administrators and will be based on student demand as well as staff and budget conditions at the school. However, the school will still have 1,910–1,950 students by the end of the enrollment reduction, and this is a sufficient size to continue offering a wide array of academic offerings.

  In terms of the enrollment reduction at Newtown resulting in an overall loss of available high school seats in Queens, the enrollment reduction at Newtown is not expected to yield a net loss of seats in building Q455. The DOE is proposing to phase 24Q236 into Q455. The approximately 304-344 seats that Newtown will lose once its enrollment is fully reduced will be recovered through the phase-in of 24Q236, which will offer that many seats once it reaches full grade span in 2016-2017. Further, the DOE plans for high school capacity on a borough-wide basis and measures high school seat capacity based on ninth-grade seats. The proposed new schools and grade expansions will add 594 ninth-grade seats available in new high schools and expanded middle schools. The phase-outs of Law, Government & Community Service High School (29Q494, "LGCS") and Business, Computer Applications & Entrepreneurship High School (29Q496, "BCAE"), and the enrollment reductions of Flushing High School (25Q4650, "Flushing"), and this proposal for Newtown would result in the loss of 487 ninth-grade seats. Therefore, the DOE anticipates there will be a net gain of 107 new ninth grade seats in Queens.

  In reference to the comment about the impact of this proposal on school culture, the DOE has confidence in the abilities of both Newtown and the new school to create strong cultures supportive of student progress and high quality performance. The DOE understands the emotions involved in the prospect of changes to a long-standing school and that Newtown is considered a home and community for all of its stakeholders. However, this is not a reason not to make changes to a school when those changes will benefit the students. As noted above, many DOE schools are successfully co-located and Building Councils are established to allow school leaders to collaborate in sharing common space, facilitating administrative decision-making and ensuring that all schools in a building operate smoothly and safely.

- Comments 2(b), 7(a), and 10 concern the rationale for opening a new school to serve ELLs when Newtown has already shown success with the ELL students and that their needs are already being met. Comments 2(a) and 5(a) state that the new school will be screened and will not accept all ELL students in contrast to Newtown accepting all students. Comment 8(b) asserts that the new school will have more and better resources than Newtown. Comment 11(d) concerns the cost of the new school.

  As noted above, Newtown serves among the highest population of ELLs in Queens and in New York City overall. The DOE is proposing to open 24Q236 as an International High School which will offer a smaller setting modeled off of a successful program for ELLs. The DOE offers our students the opportunity to apply to over 600 programs in 400 high schools which provides more choice to NYC families than any other public education system in the country. The DOE acknowledges that Newtown has shown progress serving ELL students, and that the state reported ELL graduation rate in 2010-11 was 55.5%, up from 47.9% in 2009-10. Newtown will continue to receive the support and resources needed to further succeed. However, the DOE believes that in order to serve the diverse needs of the high population of ELLs, adding a new school option for students who require a smaller setting will further benefit the community. 24Q236 will admit students who are New York City residents with priority to residents of Queens whose home language is not English and are ELLs as per DOE guidelines. It will be a Screened for Language - not an academically screened school. The school will serve students who have lived in the United States for four years or fewer at the time of admission to high school and whose home language is not English.

  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.

  While smaller schools may utilize more administrators per student than a larger high school, small schools on co-located campuses are able to realize efficiencies in other ways. Citywide, co-located schools (including newer, small schools), routinely share the cost of campus resources, including but not limited to, the cost of counselors, social workers, janitorial and maintenance staff. In this way, new small schools such as those described above are able to provide a wide array of services while also providing smaller learning environments for students.

  As in all schools, 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 12(c) and 13(a) do not directly relate to the proposal and do not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.