

## **Public Comment Analysis**

**Date:** January 15, 2013

**Topic:** The Proposed Consolidation of Independence High School's (02M544) Enrollment at its Primary Site with Existing School The High School for Environmental Studies (02M400) in Building M834 Beginning in the 2013-2014 School Year

**Date of Panel Vote:** January 16, 2013

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### **Summary of Proposal**

On November 29, 2012, the New York City Department of Education ("DOE") issued an Educational Impact Statement ("EIS") proposing to consolidate the enrollment of Independence High School (02M544) into the school's current main site in building M834. Independence is an existing transfer school that serves students 17 years of age and older and organizes students by credit needs, not grade level.<sup>1</sup> The school is currently split-sited between two buildings: a primary site, located in building M834 ("M834") at 850 10<sup>th</sup> Avenue, New York, NY 10019; and a secondary site, located in building M641 ("M641") at 250 West Houston Street, New York, NY 10014.<sup>2</sup> Both buildings are in Community School District ("District") 2. If this proposal is approved, all students enrolled at Independence High School would attend school in building M834 as the school consolidates its enrollment in a single site.

On December 5, 2012, the DOE amended this Educational Impact Statement to clarify that this proposal is not expected to have any impact on the space allocated to The High School for Environmental Studies (02M400 "HSES"), a school co-located with Independence High School. This clarification did not significantly revise the proposal.

At its primary site, Independence is currently co-located with HSES, an existing high school that serves students in 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. M834 also houses a Living for the Young Family through Education ("LYFE") program and the administrative offices of ReStart Academy. This proposal is not expected to impact HSES, the LYFE program or ReStart Academy.

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<sup>1</sup> Transfer schools are small, academically rigorous high schools designed to re-engage students who have dropped out of high school or have fallen behind. These schools are designed to create a personalized learning environment and to provide students with connections to college. Students graduate with a high school diploma from the transfer school they attend. For more information about transfer schools, please visit the DOE Web site at: [www.goingforme.org](http://www.goingforme.org).

<sup>2</sup>A "split-site" means that a single organization serves some students in one building and other students in another building.

Transfer high schools are designed to create a personalized learning environment and to provide students with connections to college. Each transfer school determines criteria for admission individually. Students graduate with a high school diploma from the transfer high school they attend.<sup>3</sup> Transfer schools do not participate in the High School Admissions Process.<sup>4</sup> Transfer schools accept students who have been enrolled in high school in New York City for at least one year and who are behind in high school or at risk of dropping out. Each transfer school determines admissions criteria individually.

Independence serves students who are over-age and under-credited. These students have attended at least one year of high school, earned a minimum of 10 credits and passed at least 1 regents exam, but are behind in credit accumulation. Independence currently enrolls students who are classified as tenth, eleventh and twelfth graders based on their credit accumulation. Independence serves students who are 17 years of age and older. It has a rolling admissions policy, accepting students throughout the year. If this proposal is approved, Independence will reduce its enrollment to reflect the decrease in instructional space. This proposed move will reduce organizational overhead and increase focus on student achievement at Independence in M834.

The consolidation of the enrollment of Independence will create additional available space in building M641. Any proposal for future use of that space will be subject to a separate Educational Impact Statement (“EIS”) and/or Building Utilization Plan, as appropriate.

### **Summary of Comments Received**

A joint public hearing regarding this proposal was held at building M834 on January 3, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 9 members of the public attended the hearing, and 1 person spoke. Present at the meeting were Ron Smolkin, principal of Independence High School; Esteban Colon, SLT member of Independence High School; Marisol Bradbury, Community District 2 High School Superintendent; Shino Tanikawa, president of Community Education Council 2 (“CEC 2”); and Jennifer Peng, of DOE Portfolio Planning.

Below is a summary of the comments received:

1. Shino Tanikawa, president of the Community Education Council for District 2 (“CEC 2”) asserted the following:
  - a. The utilization rate could be over 120% and she hopes that there is capacity to house both schools comfortably without resulting in overcrowding.
  - b. She has spoken with the principal of Independence and she heard that he has been hoping for this consolidation for quite some time. She is in support of doing as

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<sup>3</sup> For more information about transfer schools, please visit the NYC DOE website <http://schools.nyc.gov/ChoicesEnrollment/AlternativesHS/TransferHS/default.htm>

<sup>4</sup> For additional information about the High School Admissions Process, please visit the DOE’s website at <http://schools.nyc.gov/ChoicesEnrollment/High/Directory/default.htm>.

much as possible to support students who are not part of the classical system and is in support of this proposal.

2. Jo Tiedeman, a co-chairperson of the SLT for HSES, asserted the following:
  - a. She wanted to thank the DOE for being so open about communicating this proposal and impact to HSES' community.
  - b. She is asking if space use and the population of students in the building will become a problem in the future.
  - c. The general definition used in the EIS of a co-location is not the strict definition of the co-location of HSES and Independence have and will have moving forward.

**The DOE received a number of comments through its feedback email address.**

3. Gale Brewer, City Councilmember, asked why the attendance projection for the Fall of 2013 is for 340-360 at a consolidated Independence HS when there are over 100 students attending the current downtown location.

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

Comments 1(b) and 2(a) are in support of this proposal and do not require a response.

With regards to comment 2(c), the DOE's general definition of the word "co-location" does not in any way suggest that the current M834 configurations of Independence and HSES will change. HSES will continue to receive its current allocation and usage of space in the building if this proposal is approved.

Comments 1(a) and 2(b) concern the utilization rate projected in this proposal.

Although the projected utilization rate for the 2013-2014 school year exceeds 100%, there will be sufficient space to accommodate Independence and HSES pursuant to the Citywide Instructional Footprint ("Footprint"). Please visit the DOE's website to access the Footprint, which guides space allocation and use in City schools:

<http://schools.nyc.gov/community/planning/default.htm>. The Footprint can be found in the "Key Documents" section. 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, as described above.

Furthermore, the context of the projected utilization rate in 2013-2014 of 117% - 120% requires noting that the current utilization rate of building M834 in the 2012-2013 school year is 115%. The projected change in utilization for the 2013-2014 school year thus represents a 2% -5% increase in utilization.

Comment 2(b) also asks if the total population number of students in the building will present a problem in the future.

The DOE reviews enrollment projections, capacity, and utilization annually. Should this analysis indicate a need, the DOE may propose amendments to the Capital Plan to address changes in capacity need. Capacity and projected demand are analyzed on a district by district basis, and additional capacity is proposed for each district based on the overall district need.

Comment 3 asks how the consolidation of the downtown site into the main site will impact enrollment.

Separate from the consolidation, Independence will also undergo a school-initiated enrollment reduction on a schedule to be determined by the school's intake team. Independence will reduce its enrollment as students graduate from the school or are otherwise discharged without graduating. Given its rolling admissions for new students, the projected graduation rate, and historical levels of transfers and other attrition, an enrollment reduction to 340-360 students will be achieved in gradual increments within one year's time.

The DOE supports this enrollment reduction due to the decrease in Independence's instructional space as a result of moving out of M641. This proposed move will reduce organizational overhead and allow the school to increase focus on student achievement in a single location at M834.

### **Changes Made to the Proposal**

No changes have been made to this proposal.