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Chancellor

Public Comment Analysis

Date: June 18, 2013

Topic: **The Proposed Grade Truncation of P.S. 340 (10X340) to a K-5 School in 2014-2015**

Date of Panel Vote: June 19, 2013

Summary of Proposal

P.S. 340 (10X340, “P.S. 340”) is an existing zoned elementary school located in building X340, at 25 West 195th Street, Bronx, NY 10468, in Community School District 10 (“District 10”). It currently serves students in kindergarten through sixth grades and offers a full-day pre-kindergarten program. P.S. 340 is currently the only school located in building X340.

On May 2, 2013, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to implement a “grade truncation” at P.S. 340, meaning that the school will no longer enroll sixth-graders at the conclusion of the 2013-2014 school year. If that proposal is approved, at the close of the 2013-2014 school year, all fifth- and sixth-grade students who meet promotional standards will graduate from P.S. 340. During the 2013-2014 school year, P.S. 340 fifth- and sixth-grade students will participate in the District 9 and 10 Middle School Choice Process. In September 2014, P.S. 340’s fifth- and sixth-grade students will enter middle school elsewhere as sixth- and seventh-graders, respectively. Beginning in September 2014, P.S. 340 will only serve students in kindergarten through fifth grades and will continue to offer a pre-kindergarten program (subject to continued funding and demand).

Middle schools typically enroll students beginning in sixth grade, and P.S. 340 students already have the option to apply to middle school during their fifth-grade year. However, P.S. 340 students who wait until sixth grade to apply to middle school are limited to those schools that still have available seventh-grade seats. There are several middle schools in Districts 9 and 10 that rarely have seventh-grade seats open because those seats become available only if sixth-grade students leave the school. As a result, students who remain at P.S. 340 through sixth grade have fewer options than their peers who start middle school a year earlier.

Moreover, P.S. 340 students who start middle school in seventh grade may face transitional challenges related to entering middle school a year later than most of their classmates. They remain in their new middle school for only two years before moving on to high school, leaving them with less time to adjust to a new school environment and new academic expectations before facing another transition and adjustment. Multiple transitions in such close succession can have the effect of depersonalizing the school experience at a time when adolescents tend to need the most personal and supportive environments. Having students start middle school through multiple entry grades (sixth and seventh) is also challenging for middle school teachers from an instructional perspective and for the middle school as a whole.

The New York City Department of Education (“DOE”) strives to ensure that all students in New York City have access to high-quality schools at every stage of their education. Having elementary schools that end in different grades (i.e., K-5 versus K-6) creates unequal levels of access to middle school for students based simply on the year they exit elementary school, as well as unnecessary administrative challenges for both the K-6 elementary schools and the middle schools that receive their students through multiple entry grades. P.S. 340 is one of three schools in District 10 that serve students in kindergarten through sixth grades. In a separate Educational Impact Statement that can be found at <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/June2013Proposals.htm>, the DOE, in collaboration with the school administration, is also proposing to truncate the sixth grade of one of the other two schools, P.S. 360 (10X360, “P.S. 360”), for the start of the 2014-2015 school year. Collectively, these proposed grade truncations will help standardize the middle school application and entry grades in District 10, giving all P.S. 340 and P.S. 360 students access to the same range of middle school options as their peers throughout the District. This proposal is being initiated at the request of P.S. 340 leadership.

Changing P.S. 340’s grade span from K-6 to K-5 will reduce the school’s enrollment by approximately 35-45 sixth-grade students, freeing up additional space that P.S. 340 could use to accommodate additional lower-grade students or to meet other needs (e.g., art room, resource center, etc.). This will be particularly useful for P.S. 340, since it has seen an increase in its kindergarten enrollment in each year since the 2009-2010 school year.

The EIS for this proposal can be accessed here:
<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/June2013Proposals.htm>.

Copies of the EIS are also available in the main office of P.S. 340.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at the X340 building on June 3, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 10 members of the public attended the hearing, and 3 people spoke. Present at the meeting were P.S. 340 Principal Nelly Maldonado; P.S. 340 School Leadership Team (“SLT”) representatives Mary Dillon, and Rhonda Hughes; District 10 Interim Acting Community Superintendent Melodie Mashel; Community Education Council (“CEC”) 10 President Marvin Shelton; along with Kathryn Matthews and Jean-Pierre Jacquet from the DOE’s Division of Portfolio Planning.

The following questions, comments, and remarks were made at the Joint Public Hearing

- 1) Principal Maldonado shared the following comments:
 - a) She initiated the application to truncate the sixth grade of P.S. 340 and is in support of the proposal because of space limitations, which have been exacerbated by the demands of P.S. 340’s zone size, the school’s pre-kindergarten programming, and the opening of neighborhood shelters.
 - b) She reiterated her firm belief in the benefits of instructing sixth-grade students in an elementary school setting when space is available and lamented the need to truncate the sixth grade.
- 2) Mary Dillon, a member of P.S. 340’s SLT, stated the following:
 - a) Despite wanting their children to stay in the P.S. 340 community, the SLT as a whole is in full support of the proposed truncation because it would provide more educational choices and ease the transition to middle school for future graduates of P.S. 340.
 - b) She expressed frustration at the size of P.S. 340’s zone and reiterated that P.S. 340 has difficulty serving its zoned students.

- 3) Rhonda Hughes, a member of P.S. 340's SLT:
 - a) Expressed her support for the truncation given the difficulties caused by the unpredictable fluctuations in P.S. 340's sixth grade enrollment.
 - b) Lamented that area middle schools could not continue the previous practice of saving seats in the seventh grade for sixth-grade graduates of P.S. 340.
- 4) Marvin Shelton, CEC 10 President, shared the following:
 - a) He expressed concerns about the impact that this proposal would have on The New School for Leadership and Journalism (10X244, "Leadership and Journalism"). He stated that Leadership and Journalism is the zoned middle school for a majority of P.S. 340's students.
 - b) He also worried that despite the proposed truncation, Principal Maldonado would still face space constraints because of continued enrollment increases in P.S. 340's younger grades.
- 5) Deirdre Burke, the founding principal of P.S. 340, stated that:
 - a) She supports the decision to truncate P.S. 340 despite her opposition to truncations because the school is serving approximately 100 students over the building capacity.
 - b) She hopes that if the proposal is passed, the DOE will not increase student enrollment in P.S. 340's lower grades but serve students from the community.
 - c) Though legally appropriate, she personally didn't believe that P.S. 340 had sufficient amount of space to serve its students.
 - d) She is frustrated with P.S. 340's zoned admissions policy, along with the geographic size and the growth in the number of student in P.S. 340's zone.
 - e) She reiterated her support of elementary schools that serve sixth-grade students and referenced that studies have shown that student test scores drop at elementary schools that have truncated their sixth-grades.
- 6) One parent of a current fifth-grade student asked if her son could complete his sixth-grade year at P.S. 340.

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

The DOE received 1 written comment and no messages via voicemail concerning this proposal.

- 7) Council Member G. Oliver Koppell submitted the following statements.
 - a) He affirmed his understanding of the advantages of allowing students to graduate in the fifth rather than the sixth grade.
 - b) He expressed concern that Leadership and Journalism will not have room to support an influx of sixth and seventh graders in September 2014.
 - c) He wanted more information about the DOE's plans to handle the potential overflow of students at area middle schools.

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

Comments 1(a), 2(a) 3(a), 5(a) and 7(a) express support for the truncation proposal and do not require a response.

Comments 1(b) and 5(e) express support for educating sixth-grade students in elementary school settings.

The DOE believes that P.S. 340 families will benefit from this proposal on the whole. While P.S. 340 sixth-graders may enjoy their sixth grade year in the elementary setting, the reasons underlying this proposal concern their transition to seventh grade. Middle schools typically begin serving students in the sixth grade. When P.S. 340 sixth-graders apply to middle school for seventh grade, they are limited to those schools that still have available seventh-grade seats. As a result, some P.S. 340 students may not be able to secure a seat at their preferred middle school. By participating in the Middle School Choice Process during fifth grade like most other District 10 students, P.S. 340 students will have access to the same range of middle school options as their peers. Moreover, P.S. 340 students who transition to middle school in seventh grade, a year later than their peers, face other challenges as a result of having less time to adjust to a new school environment and new academic expectations before facing another transition and adjustment in high school. Multiple transitions in such close succession can have the effect of depersonalizing the school experience at a time when adolescents tend to need the most personal and supportive environments. Thus, the DOE anticipates that the increased access to choice and smoother middle school transition outweigh any benefit associated with remaining in elementary school for sixth grade.

In reference to comment 5(e) since the commenter did not cite any specific study, the DOE can not attest to the existence or validity of the reference.

Comments 2(b), 4(b), 5(b), 5(c) and 5(d) share concerns about P.S. 340's ability to serve its zoned students after the proposed truncation within the space available in building X340, with some expressing frustration at the size of P.S. 340's zone as well as growth in the school's incoming classes.

P.S. 340 is and will remain a zoned elementary school. If this proposal is approved, P.S. 340 will continue to give priority to students who reside in its zone in accordance with Chancellor's Regulation A-101. The reduction in P.S. 340's grade span from K-6 to K-5 will free up additional space that P.S. 340 could use to accommodate lower-grade students or to meet other student needs. This will be particularly useful for P.S. 340 since it has seen an increase in its kindergarten enrollment in each year since the 2009-2010 school year.

Schools may submit a request to cap zoned enrollment if all classes on a grade level reach the maximum class size as set forth in the United Federation of Teachers contract and the school does not have sufficient space to program an additional class section in that grade. This proposal will not impact the P.S. 340 administration's ability to request a cap.

In specific reference to space, The Footprint is the guide used to allocate space to all schools based on the number of class sections the school programs and the grade levels of the school. For elementary schools like P.S. 340, the Footprint assumes that classes are self-contained, meaning that each class remains in its homeroom throughout the day except for when it is scheduled for a cluster activity (for example, art), lunch, recess, etc. Further, this assumes that at those times the homeroom classroom remains empty. Therefore, the Footprint allocates one full-size classroom for each general education ("GE") or Integrated Co-Teaching ("ICT") section and one full- size or half-size classroom to accommodate each self-contained ("SC") special education section served by the school. In addition, elementary schools, including P.S. 340, receive an allocation of cluster or specialty classrooms proportionate to the number of students enrolled.

Decisions on how to program classes are left to the discretion of the principal. Principals make these determinations based on enrollment, budget, student needs, and other considerations. These classrooms can be used for purposes such as art and/or music instruction, among other things.

Finally this proposal is not expected to impact academic or extra-curricular offerings for students in grades kindergarten through five, or for sixth-graders in 2013-2014. All students will continue to receive mandated special education services and instruction for English Language Learners.

Comment 3(b) expresses frustration with the implementation of the District 10 Middle School Choice Process, with the commenter specifically wondering why middle schools cannot hold seventh-grade seats open for sixth-grade graduates of P.S. 340.

District 10 currently shares a Middle School Choice Process with District 9, which means that District 9 and District 10 students have preference for choice schools and programs in both districts, although District 9 students retain priority over District 9 seats and District 10 students retain priority over District 10 seats. Fifth-grade students who meet promotional standards and live within either district are eligible to apply to any District 9 or 10 choice middle school. Students rank their preferences from among the District 9 and District 10 choice middle schools and programs, as well as their zoned option. These options include:

- Choice middle schools or programs with a screened application process (admission is based on criteria designated by the school);
- Choice middle schools or programs with an unscreened or limited unscreened application process (limited unscreened schools admit students on the same basis as unscreened schools, except that they give preference to students who have attended a school information session);
- Zoned middle schools and campus choice middle schools (multiple schools in one campus collectively serving a zone);
- K-8 schools with an unscreened application process that have available seats for middle school students;
- 6-12 schools with an unscreened, limited unscreened, or screened application process for middle school students.

Students may also choose to apply to a number of schools that manage their own admissions process. In this way, the DOE is able to offer individual students the widest breadth of options across a large number of schools.

There are several middle schools in Districts 9 and 10 that rarely have seventh-grade seats open because those seats become available only if sixth-grade students leave the school. Middle schools cannot reserve seats for seventh-graders because that would require leaving sixth-grade seats open for an entire year with the hope they would be filled in the following year. Moreover, holding seventh-grade seats for students who choose not to use the Middle School Choice Process during their fifth-grade year would limit the choice of students across the district. The proposed truncation will provide greater choice to the students of P.S. 340 without limiting the options of other students.

Comments 4(a), 7(b), and 7(c) suggest that Leadership and Journalism will be negatively impacted by this proposal, in that the school does not have sufficient space to serve an influx of fifth- and sixth-grade students from P.S. 340 in September 2014; one commenter questioned the DOE's plans generally to accommodate sixth-grade students from P.S. 340 at area middle schools.

As referenced in the response to comment 3(b), all District 10 fifth-grade students have access to the Middle School Choice Process in District 9 and District 10. The DOE believes that while some students and families will choose to attend their zoned middle school for sixth grade, as they currently do for seventh grade, many will exercise choice given the greater number of middle school program options available to graduating fifth-grade students in District 10. It is therefore unlikely that any one school, such as Leadership and Journalism,

will experience a significant increase in middle school applicants, as the number of additional students will be spread across many schools. Indeed, schools such as Leadership and Journalism have expressed a preference for the standardization of elementary schools to serve K-5, as this reduces the planning and transitional challenges associated with accepting students at multiple entry grades (both sixth and seventh grades), as described above.

In specific reference to comments 4(a) and 7(b) it is important to note that only a portion of students living in the P.S. 340 zone are zoned to Leadership and Journalism for middle school. Leadership and Journalism is currently operating with rooms above its footprint allocation, meaning that it could accommodate additional sixth-grade students. Further, Leadership and Journalism enrolls many students who do not reside in the zone. If additional zoned students choose to enroll as a result of this proposal, they would be prioritized ahead of students who do not reside in its zone, according to Chancellor's Regulation A-101, which can be found at: <http://schools.nyc.gov/RulesPolicies/ChancellorsRegulations/default.htm>.

As stated in the EIS, District 10 has a projected excess capacity of 239 sixth-grade seats during the 2014-2015 school year. Total sixth-grade seat capacity excludes sixth-grade seats at schools that have been approved or proposed for closure. Total sixth-grade seat capacity includes sixth-grade seats at approved or proposed new schools, as well as sixth-grade seats at schools expanding to serve middle school grades beginning in 2014-2015. Note this total sixth-grade seat capacity excludes sixth-grade seats at K-6 schools because historical trends indicate that fifth-graders that attended a truncated K-6 school would not articulate into another K-6 school for sixth grade, so those seats generally do not represent real options for sixth grade.

Finally, in specific response to comment 7(c), the DOE reiterates that zoned middle schools are afforded the same opportunities to use the cap and overflow process that was outlined in response to comments 2(b), 4(b), 5(b), 5(c) and 5(d).

Comment 6 questions how the proposal would impact current fifth-grade students.

This proposal will be voted on by the Panel for Educational Policy on June 19, 2013. If approved, this proposal will go into effect for the 2014-2015 school year and will not impact the ability of current P.S. 340 fifth-graders to complete the sixth-grade at P.S. 340 in 2013-2014.

Changes Made to the Proposal

No changes have been made to the proposal.