

Public Comment Analysis

Date: June 18, 2013

Topic: The Proposed Expansion and Permanent Extension of the Co-location of Castle Bridge School (06M513) with Existing School P.S. 128 Audubon (06M128) in Building M128 Beginning in 2014-2015

Date of Panel Vote: June 19, 2013

Summary of Proposal

On May, 2, 2013, the New York City Department of Education (“DOE”) issued a proposal to expand the grades served by Castle Bridge School (06M513, “Castle Bridge”) in building M128 (“M128”), located at 560 West 169th Street, New York, NY 10032 in Community School District 6 (“District 6”), from kindergarten through two to kindergarten through five, beginning in the 2014-2015 school year, and to permanently co-locate Castle Bridge in M128. Castle Bridge is an existing choice district elementary school and is co-located with P.S. 128 Audubon (06M128, “P.S. 128”), an existing zoned elementary school that currently serves students in grades kindergarten through five and maintains a pre-kindergarten program in M128. Castle Bridge is currently phasing into building M128 and currently serves students in kindergarten and first grade. Beginning in 2013-2014, Castle Bridge will serve grades kindergarten through two, as well as a pre-kindergarten program, in M128. If this proposal is approved, Castle Bridge will be permanently co-located with P.S. 128 in M128, and will add one grade each year until 2016-2017, when it will serve students in kindergarten through fifth grades, along with a pre-kindergarten program. P.S. 128 will continue to serve students in grades kindergarten through five and will continue to maintain a pre-kindergarten, subject to continued funding and demand. 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 November 17, 2011, the Panel for Educational Policy (“PEP”) approved a proposal, published on October 3, 2011, to temporarily co-locate Castle Bridge with P.S. 128 in M128 for the 2012-2013 and 2013-2014 school years. The approved proposal stated that the DOE would evaluate the available space in M128 and other buildings in District 6 to identify a permanent location for Castle Bridge and would issue a new Educational Impact Statement (“EIS”) to propose the permanent location for Castle Bridge. After completing the evaluation, the DOE has determined that building M128 has sufficient space to accommodate the permanent co-location of Castle Bridge.

Castle Bridge’s mission is to provide each student with a high-quality, arts-infused, project-based elementary school experience that will develop the skills and passions for inquiry and engagement in support of the students’ growth as scholars, workers, and citizens. In addition, Castle Bridge offers a Spanish dual-language program.

If this proposal is approved, Castle Bridge will continue to add one grade each year until 2016-2017, when Castle Bridge will serve a total of 183-243 students in the pre-kindergarten program and grades kindergarten through five in M128. Castle Bridge is a choice elementary school, which means that it is open for admissions to all students in District 6, without giving priority to students who live in any particular zone. Castle Bridge admits students in kindergarten and first grade through a school-based application process consistent with Chancellor’s Regulation A-101. Castle Bridge will have a pre-kindergarten program beginning in the 2013-2014 school year, serving one full-day class, and will admit students through the standard universal pre-kindergarten admissions process.

P.S. 128 currently serves a combined total of 595 students in pre-kindergarten and grades kindergarten through five. P.S. 128 is a zoned elementary school that admits students in kindergarten through fifth grades in accordance with Chancellor’s Regulation A-101. P.S. 128 also has a pre-kindergarten program, which admits students through the standard universal pre-kindergarten admissions process. P.S. 128 currently offers two full-day pre-kindergarten

classes. In addition, P.S. 128 offers a transitional bilingual program. Beginning in 2013-2014, P.S. 128 will add an additional class for a total of three full-day pre-kindergarten classes. Admissions procedures for P.S. 128 and Castle Bridge are discussed in more detail in Section III.A of the EIS.

According to the 2011-2012 Enrollment Capacity Utilization Report (the “Blue Book”), M128 has a target capacity to serve 920 students. Currently, the building serves 654 students, yielding a building utilization rate of 71%. According to the Under-utilized Space Memorandum, building M128 is “under-utilized” and has extra space to accommodate additional students.

If this proposal is approved, in 2014-2015, Castle Bridge will serve a combined total of approximately 123-163 students in grades kindergarten through three and the pre-kindergarten program, and P.S. 128 will serve a combined total of approximately 549-609 students in grades kindergarten through five and the pre-kindergarten program. In 2014-2015, the M128 building is projected to serve approximately 672-772 students in total, yielding an estimated building utilization rate of 73%-84%. In 2016-2017, the final year of expansion, the M128 building is projected to serve 737-857 students in total, yielding an estimated building utilization rate of 80%-93%.

In addition, there are currently three Community Based Organizations (“CBOs”) occupying space in the M128 building: Turn 2 Us, which offers extra-curricular activities with a focus on social, emotional, and psychological well-being; a school-based health clinic run by Columbia Presbyterian Hospital; and SAPIS – Project Soar, a drug prevention program. This proposal is not anticipated to impact these organizations.

The DOE strives to ensure that all students in New York City have access to a high-quality school at every stage of their education. In determining the optimal way to distribute space to schools and to maintain quality educational options, the DOE is proposing to expand and permanently extend the co-location of Castle Bridge in M128. This will allow Castle Bridge to continue to exist as a high-quality, progressive, Spanish dual-language school option for students and families in District 6, and will allow students currently enrolled at the school to continue their elementary education in the M128 building.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at building M128 on June 12, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 50 members of the public attended the hearing, and 16 people spoke. Present at the meeting were: District 6 Superintendent Elsa Nunez; P.S. 128 Principal Rosa Argelia Arredondo; Castle Bridge Principal Julie Zuckerman; Castle Bridge School Leadership Team (“SLT”) Representatives Andrea Fonera, Mireia Castillo-Martin, and Tara Crean; Community Education Council 6 (“CEC 6”) Representative Fe Florimon; New York City Council Member Ydanis Rodriguez; and Meera Jain, Yael Kalban, and Jorge Cruz from the DOE’s Division of Portfolio Planning.

The following comments and remarks were made at the joint public hearing on June 12, 2013:

1. New York City Council Member Ydanis Rodriguez supported the proposal and commented as follows:
 - a. I support the progressive education offered at Castle Bridge as it teaches children to think critically.
 - b. I support Castle Bridge like I support all schools in the community.
 - c. Castle Bridge should be permanently sited in this building and this will not have a negative impact on P.S. 128.
 - d. We need to create a strong path to college as 87% of community college students need remediation.
 - e. Every school needs strong parental involvement and strong academic leadership.
 - f. This is not about us, but about providing students with more choices and opportunities.
 - g. The more principals collaborate together, the better it is for students.
 - h. We need to continue improving schools and providing students with a quality education.
2. CEC 6 representative Fe Florimon commented as follows:
 - a. I am neutral about this proposal and respect the community’s opinion.
 - b. It’s okay to feel irritated or upset about the complexity of this proposal.

- c. This situation is like when you loan someone a room in your house, that person can take over the whole house and push you out.
 - d. I hope the DOE will keep its promise to what is being proposed in this building.
 - e. In my personal opinion, this proposal is a done deal.
 - f. Castle Bridge will create an opportunity for many children, regardless of color, ethnicity and ELL status, to learn.
3. Castle Bridge Principal Julie Zuckerman supported the proposal and commented as follows:
 - a. We received over 210 applications for pre-kindergarten.
 - b. It can be challenging to share a building, but we're doing it well here.
 - c. We're collaborating with P.S. 128 to meet the needs of students.
 - d. Castle Bridge has sought to use as little space as possible; we don't use the library, rarely use the auditorium and only use the gym if it is raining during recess.
 - e. We share what we have with P.S. 128, like a performance by a band from Canada, a new farming project in Highbridge Park, and upgraded wiring in the building.
 - f. We're looking forward to growing and becoming a helpful force in the community.
 4. P.S. 128 Principal Rosa Argelia Arredondo commented as follows:
 - a. We appreciate the collaboration with Castle Bridge and look forward to continuing to build a relationship with them.
 - b. Our community feels that the DOE expedited this process unnecessarily.
 - c. The DOE did not send Spanish documents to our community as quickly as they sent us English documents.
 - d. Our community is passionate about what we do every day for children.
 - e. Regardless of where our children come from, we are dedicated to improving the lives of children.
 5. P.S. 128 SLT representative Mireia Castillo-Martin supported the proposal and commented as follows:
 - a. As a choice school, students come from all over District 6, but they are part of the community.
 - b. I chose this school over my zoned school, and I am happy.
 - c. This school is different because it has a progressive educational model with dual-language and bilingual programs.
 - d. We are very interested in helping the community grow.
 6. Multiple commenters noted that the current siting is temporary, and asserted that it should not be made permanent.
 7. One commenter asserted that in 2014, P.S. 128 will cease to exist.
 8. One commenter expressed the opinion that Castle Bridge is a unique, warm and supportive school.
 9. One commenter stated that the commenter's child wants to be an architect because of what he learns at Castle Bridge.
 10. One commenter asserted that parents have strong communication with Castle Bridge teachers.
 11. One commenter asserted that parents enjoy walking to a neighborhood school like Castle Bridge.
 12. Multiple commenters stated that they are committed to Castle Bridge and to being generous and respectful neighbors to P.S. 128.
 13. Multiple commenters stated that they want to work with P.S. 128 to empower their children to become wonderful citizens of the world.
 14. Multiple commenters stated that they feel welcomed by P.S. 128 and want to continue to grow that relationship by sharing activities and fostering friendships.
 15. One commenter stated that the Spanish dual-language program at Castle Bridge has inspired him to learn Spanish alongside his son.
 16. One commenter expressed the opinion that her son, who is enrolled in P.S. 128, has had a negative experience, while her daughter, who is in enrolled in Castle Bridge, has had a good experience.
 17. Multiple commenters suggested that co-location is not easy, but they are grateful to P.S. 128 for sharing.
 18. One commenter questioned why P.S. 128 won't give space to Castle Bridge.
 19. One commenter opposed the proposal and asserted that:
 - a. This co-location is an affront against parents, the community and our ethnic group.

- b. The Parent Teacher Association of P.S. 128 rejects the request to give Castle Bridge more space in our building.
 - c. The DOE is playing with our parents, communities, and families by not respecting our heritage.
 - d. This co-location has caused parents and communities to work against each other.
 - e. The Parent Teacher Association demands the DOE to not implement the permanent co-location of Castle Bridge.
 - f. P.S. 128 belongs to our children and community.
 - g. P.S. 128 has requested to expand to eighth grade and it hasn't been granted.
 - h. The commenter also asked why there is a difference between P.S. 128 and Castle Bridge.
20. One commenter opposed the proposal and:
- a. Rejected the request for the permanent co-location of Castle Bridge.
 - b. Asserted that this is P.S. 128's building and there is no more space for Castle Bridge.
 - c. Demanded that the DOE allow P.S. 128 to grow to eighth grade.
 - d. Demanded that the DOE implement an after-school program to meet P.S. 128's educational needs.
 - e. Demanded that the DOE allow P.S. 128's pre-kindergarten classes to increase from two to six.
 - f. Demanded that the DOE allow P.S. 128 to increase their kindergarten classes from four to eight.
 - g. Demanded a resource center for parents and art classes in P.S. 128.
 - h. Requested additional funding for P.S. 128's budget.

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

21. One comment was received via email in support of this proposal and commented as follows:
- a. I am grateful to have my child at Castle Bridge because the diversity is socially and academically better for him.
 - b. Students are challenged by peers with different life experiences and perspectives.
 - c. Children have to seek multiple ways to solve problems when surrounded by people who are not limited to a common frame of references.
 - d. Castle Bridge seeks to stake out a different model of excellence.
22. One comment was received via email in support of this proposal and commented as follows:
- a. Teachers are very attentive to what makes children interested in learning and how to motivate them to be deep readers and big thinkers.
 - b. Children learn from one another in a caring community and play a vital role in helping to design the curriculum.
 - c. Children have the opportunity to become fluent in English and Spanish through the dual-language program.
 - d. Castle Bridge uses a 50:50 model, teaching half of the time in English and half of the time in Spanish, by dividing the school day in two.
 - e. Castle Bridge achieves an environment of educational and linguistic equity in the classroom by maintaining a ratio of 50% English speakers and 50% Spanish speakers and by promoting interactions between English and Spanish speakers.
 - f. This helps raise our children to be bilingual, bicultural, and biliterate citizens.
 - g. Children acquire vocabulary in a second language better when the language is embedded in projects in which they take a high degree of initiative.
 - h. We are grateful to the DOE and District 6 for giving us an opportunity to have Castle Bridge.
23. One petition was received via email from the Parents Association of P.S. 128 opposing the proposal because it was issued before the end of the two-year temporary co-location of Castle Bridge.

No written comments were received at the joint public hearing.

No oral comments were received via voicemail.

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

Comments 1(a-c), 2(g), 3, 4(a), 5, 17, and 21-22 are in support of the proposal and thus do not require a response.

Comments 2(a,b), and 16 are unrelated to the proposal and thus do not require a response.

In response to comments 1(d-h), 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. The DOE acknowledges these comments and recognizes the collaborative role that parents and principals partake in developing a school. In addition, schools throughout the city are not just educational institutions, but rich and tight-knit communities. The DOE expects that all schools will be fully engaged with the community and will continue to play a vital role as an anchor for the community.

Comments 2(f), 4(d-e) and 19(f) discuss the positive aspects of P.S. 128, its school leadership, and its standing in the community. With respect to these comments, the DOE's proposal to permanently co-locate Castle Bridge in M128 is not intended as a slight against P.S. 128 or its leadership. Instead, it is intended to give families in the community an additional option. Further, as stated in the EIS, this proposal is not expected to impact the enrollment or programming at P.S. 128.

Comment 19(h) suggests that the DOE treats P.S. 128 and Castle Bridge differently. The DOE does not distinguish between students attending P.S. 128 and Castle Bridge. In all cases, the DOE seeks to provide high-quality educational options and to allow parents and students to choose where to attend school.

Comment 4(c) relates to the availability of translated Spanish documents related to the proposal. The DOE encourages all families and community members to participate in these processes and support their schools. To facilitate the involvement of Spanish-speaking families, the DOE provided translated versions of all documents relevant to the proposed changes for building M128 and offered translation services at the joint public hearing. Translation services will also be available for community members at the PEP vote where there will be a vote regarding this proposal.

Comment 7 suggests that this proposal will lead to the closure of P.S. 128. As stated in the EIS, this proposal is for the proposed expansion and permanent co-location of Castle Bridge in M128 only. Furthermore, the DOE does not believe that the proposed expansion and permanent co-location of Castle Bridge will impact P.S. 128's enrollment or the grades served by the school. The enrollment projections in the EIS are based on the current enrollment at P.S. 128 at the entry point grade level, and assume that the same number of students will age up and that there will be stable incoming enrollment at the entry point grade.

Comments 2(d,e) suggests a decision has already been made regarding this proposal. While the DOE supports the proposed expansion and permanent co-location of Castle Bridge in M128, the DOE notes that no decision has been made on this proposal. Any proposed change to school utilization must go through the process outlined by Chancellor's Regulation A-190 and be approved by the PEP before it can take effect.

Comments 2(c), 18, 19(b), 20(b) relate to space allocations. There are currently hundreds of schools in buildings across the City that are co-located; some of these co-locations are multiple DOE schools while others are DOE and public charter schools sharing space. In all cases, allocation of classroom, resource, and administrative space is guided by the Citywide Instructional Footprint (the "Footprint") which is applied to all schools in the building. The DOE seeks to fully utilize all its building capacity to serve students. In all cases, the DOE seeks to provide high-quality educational options and allow parents/students to choose where to attend school.

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. The number of class sections at each school is determined by the

Principal based on enrollment, budget, and student needs; there is a standard guideline of target class size (i.e., number of students in a class section) for each grade level. For elementary schools serving grades kindergarten through five (and for all pre-kindergarten programs), the Footprint assumes that classes are self contained. Therefore, the Footprint allocates one full-size room for each general education or ICT section and a full-size or half-size room to accommodate each SC special education section served by the school. In addition to these rooms, schools serving grades kindergarten through five receive an allocation of cluster or specialty rooms proportionate to the number of students enrolled. These spaces can be used at the principal’s discretion for purposes such as art and/or music instruction, among other things.

The Footprint allocates the number of baseline rooms for student support services, resource rooms, and administrative space based on the grades a school serves and its enrollment at scale. As in other situations where schools are co-located, the schools would need to share large common and specialty rooms in the building, such as the cafeteria, the gymnasium, and the library. 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 full text of the Instructional Footprint is available at http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

The assignment of specific rooms and location for each in the building, including those for use in serving students with IEPs or special education needs, will be made in consultation with the Principals of each school and the Office of Space Planning if the proposal is approved.

The table below provides the instructional adjusted baseline footprint allocation of full-size rooms throughout the proposed expansion and permanent co-location of Castle Bridge in M128:

DBN	School Name	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017
06M513	Castle Bridge	5	7	10	12	13
06M128	P.S. 128	31	32	32	32	32
Full-Size Rooms Allocated		36	39	42	44	45
Full-Size Excess Rooms Available in M128		15	12	9	7	6

The Office of Space Planning will work with the Building Council to ensure an equitable allocation of the excess space. In determining an equitable allocation, the Office of Space Planning may consider factors such as the relative enrollments of the co-located schools, the instructional and programmatic needs of the co-located schools, and the physical location of the excess space within the building.

Comments 19(a,d,e) relate to co-locations. Given the finite number of buildings available in New York City, the DOE attempts to use all of its school buildings as efficiently as possible. Co-location is therefore very common in New York City schools – with 33% of all DOE buildings housing more than one school organization - as there are not sufficient school buildings to allow each school organization to operate its own building. A co-location means that two or more school organizations are located in the same building. While they share common spaces like auditoriums, gymnasiums, and cafeterias, each school is allocated particular classrooms and spaces for its own students’ use. The DOE is confident that the principals in M128 will be able to create a collaborative and mutually respectful environment for all students, staff, and faculty members in the building. Indeed, the comments made by the school leaders of Castle Bridge and P.S. 128 indicate that such an environment is already being developed.

Although the DOE recognizes that some in the community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities at M128 will be able to create productive and collaborative partnerships.

In regards to comments 19(c) and 20(a), the DOE does not evaluate schools for co-location based on the demographics of the community; rather it uses space information to propose co-locations.

In regards to comments 19(g) and 20(c), the DOE commends P.S. 128 for its commitment to students and families. To date, the DOE and Office of New Schools has not formally received a letter of intent from P.S. 128 to reconfigure their grade span. Thus, no determination has been made about reconfiguring P.S. 128's grade span. Any future request would be evaluated based on its merits and the space available in the building at the time.

In regards to comments 4(b), 6, and 23, the DOE followed procedures outlined by Chancellor's Regulation A-190 in proposing the expansion and permanent co-location of Castle Bridge in M128. Although the original proposal was for a two-year temporary co-location of Castle Bridge in M128 beginning in 2012-2013, the DOE now projects that there will be more excess space in the building in future years. As a result, the DOE was able to determine this year that there is sufficient excess to propose the expansion and permanent co-location of Castle Bridge in M128 beginning in M128.

Comments 20(d,g) request that the DOE implement an after-school program and resource center in P.S. Fair Student Funding ("FSF") dollars – approximately \$5.0 billion in the 2012-2013 school year based on projected registers – are used by all district schools to cover basic instructional needs and are allocated to each school based on the number and need-level of students enrolled at that school. All money allocated through FSF can be used at the principals' discretion, such as hiring staff, purchasing supplies and materials, or implementing instructional programs. If P.S. 128 chooses to use their FSF dollars to implement an after-school program and resource center, they are empowered to do so.

Comment 20(e) requests that the DOE increase pre-kindergarten classes from two to six. Beginning in the 2013-2014 school year, P.S. 128 will offer three full-day pre-kindergarten classes, which is an increase from two full-day pre-kindergarten classes in 2012-2013. Should additional opportunities arise and space exists in M128 to allocate new pre-kindergarten programs for 2014-2015 and future years, the Office of Early Childhood Education will consider P.S. 128's application request, should they choose to submit.

Comment 20(f) requests that the DOE increase P.S. 128's kindergarten classes from four to eight. P.S. 128 is a zoned school. A student's zoned elementary school is determined by his or her home address, and zoned schools are expected to serve those students who reside in the zone and choose to attend. In the case of P.S. 128, the school has been able to do so within four kindergarten classes in recent years, and is also able to accommodate non-zoned students. Given the school's out-of-zone enrollment and the excess space that is projected to remain in the building if this proposal approved, P.S. 128 will be able to accommodate additional zoned students should zoned demand increase in the future. If zoned demand increases such that it cannot be accommodated, P.S. 128 may request to cap its enrollment. Schools may submit a request to cap 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.

Comment 20(h) pertains to funding at P.S. 128. The DOE funds schools through a per pupil allocation. That is, funding "follows" the students and is weighted based on students' grade level and need (incoming proficiency level and special education/ELL/Title I status). If a school's population declines from 2,500 to 2,100 students, the school's budget decreases proportionally—just as a school with an increase in students receives more money. Even if the Department of Education had a budget surplus, a school with declining student enrollment would still receive less per pupil funding each year enrollment falls. P.S. 128's enrollment has declined, between 2007-2008 and 2012-2013, P.S. 129's audited register enrollment dropped by 27%, or 222 students, which resulted in a decrease in Fair Student Funding.



Changes Made to the Proposal

No changes have been made to the proposal in response to public feedback.