



Public Comment Analysis

Date: April 27, 2011

Topic: The Proposed Co-location of a New DOE School 10X524 with Grace Dodge Career and Technical Education High School (10X660) in School Building X660

Date of Panel Vote: April 28, 2011

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to co-locate a new DOE high school, 10X524, which will be called Crotona International High School (“Crotona International”), in school building X660 (“X660”), located at 2474 Crotona Avenue, Bronx, NY 10458, within the geographical confines of Community School District 10. If this proposal is approved, Crotona International would be co-located in building X660 with Grace Dodge Career and Technical Education High School (10X660, “Grace Dodge”). Grace Dodge is an existing high school currently serving students in grades 9-12. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, libraries, and cafeterias.

In consultation with the school leader, the DOE plans to downsize Grace Dodge by decreasing its enrollment by approximately 100-125 students per year over the course of four years beginning in the 2011-2012 school year. By 2014-2015, Grace Dodge would have decreased enrollment by approximately 400-500 students and will serve approximately 816-916 students at scale in grades 9-12. The downsizing of Grace Dodge would occur regardless of whether this co-location proposal is approved.

If this proposal is approved, Crotona International would gradually phase in to X660 while Grace Dodge simultaneously scales back its enrollment. The new school would serve students in grade 9 in 2011-2012 and would add one grade level every year until the school reaches its full grade span of 9-12 in the 2014-2015 school year, serving approximately 400-450 students. The school will be partnered with Internationals Network for Public Schools, an organization that works to ensure all recent immigrant students have access to a quality high school education that prepares them for college and careers. In addition, Crotona International plans to offer Career and Technical Education (“CTE”) programs though the specific programs are still to be determined.

During the first year of phase-in, Crotona International would not participate in the High School Admissions Process. The school would serve “newcomers” or students who are new immigrants to the country by admitting them through the over-the-counter (“OTC”) process. In 2012-2013,

however, Crotona International would be open to students through the City-wide High School Admissions Process, and would have a Screened admissions method. In general, Screened schools rank students based on their academic record, standardized test scores, attendance, and punctuality. Schools may also use other criteria to evaluate applicants such as an interview, essay or additional diagnostic test. In this instance, given the school's instructional model, Crotona International would admit recently immigrated English Language Learners ("ELLs") and will help students develop their English proficiency through the English as a Second Language ("ESL") program.

In 2009-2010, building X660 had a target capacity to serve 1,474 students, and the building enrolled 1,417 students, yielding a target building utilization rate of 96%. In 2010-2011, building X660 has an enrollment of 1,316 students, yielding a utilization rate of 89% of target capacity. The X660 building will have adequate capacity to accommodate the new high school and Grace Dodge at full operational capacity. Once Crotona International completes its phase-in and Grace Dodge completes its downsizing, the building would serve approximately 1,216-1,366 students in 2014-2015, yielding an approximate utilization rate of 93% of target capacity.

The details of this proposal are available in an Educational Impact Statement ("EIS") which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Apr282011Proposals>. Copies of the EIS are also available in the main office of Grace Dodge.

Summary of Comments Received at the Joint Public Hearing

A Joint Public Hearing regarding this proposal was held at X660 on April 7, 2011. At the hearing, interested parties had an opportunity to provide input on the proposal. Approximately 32 members of the public attended the hearing and 6 people spoke. Present at the meeting were: Bronx High Schools Superintendent Elena Papaliberios; President of Community Education Council ("CEC") 10 Marvin Shelton; Grace Dodge School Leadership Team ("SLT") representative and president of the Parent Association ("PA") Maria Ramos; Grace Dodge SLT representative Brenton Anderson; Principal of Grace Dodge Roberto Hernández; Denise Sullivan from the Citywide Council on High Schools ("CCHS"); and Sara Kaufman from the DOE's Office of Portfolio Management.

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

1. Multiple commenters stated that it is very important that the principal of Grace Dodge and the principal of the new school work collaboratively to ensure that the co-location works well, especially on matters related to the use of the cafeteria during lunch, safety and security in the building, and overcrowding in the hallways.
2. Multiple commenters expressed the hope that the co-location will turn out to be positive and that it does not trump the good work already taking place at Grace Dodge or the strong sense of community at the school.
3. Multiple commenters expressed concern that co-locating a new school in the building might negatively affect Grace Dodge since new schools are better funded

- and have more resources. Commenters suggest that the DOE should allocate those funds to improving Grace Dodge, and not to open a new school in the building.
4. Multiple commenters expressed concern about the reduction of teaching staff at Grace Dodge as a result of the downsizing.
 5. Multiple commenters asked if Grace Dodge is closing and whether the new international school is a replacement for Grace Dodge.
 6. A commenter asked why the DOE is downsizing Grace Dodge.
 7. A commenter stated that:
 - a. Grace Dodge serves a high-risk population of students. The school has a high rate of teenage pregnancy, poverty and homelessness. A large number of students reside in shelters and although those students come to school every day, it is hard to say that given their circumstances they can perform well every day. Yet teachers work very hard to help their students overcome adversities and meet standards.
 - b. What matters most are the strong relationships built at the school, not school statistics. Three years ago, the rate of teenage pregnancy among entering ninth-grade students was 10%. This is not accounted for in the school statistics released by the DOE. The DOE should recognize that Grace Dodge serves a high-risk population and that it should provide more resources to the school so that these students can be better served.
 - c. Grace Dodge currently serves a large population of ELLs. The commenter asked whether the new international high school would serve ELL students already enrolled at Grace Dodge or whether Grace Dodge would continue to receive a large volume of ELL students despite the lack of ESL services available to them at Grace Dodge.
 8. A commenter expressed concern about the use of the word “downsizing” in reference to Grace Dodge and suggests that the school should not be labeled as such because it might have an impact on the number of students applying to the school.
 9. A commenter expressed the opinion that the new school would be a great asset to the Grace Dodge community.
 10. A commenter stated that Grace Dodge students benefit from the school’s Career and Technical Education programs. Students are very professional and mature.
 11. A commenter stated that students at Grace Dodge need more support.

The DOE received comments at the Joint Public Hearing that did not directly relate to the proposal and therefore will not be addressed.

12. A commenter expressed the opinion that Grace Dodge has a culturally diverse staff and that teachers should generally represent the cultures of the students they teach.
13. A commenter suggested that the Panel for Educational Policy (“PEP”) should hold some of its meetings in the Bronx.
14. Multiple commenters stated that the principal and teachers at Grace Dodge are doing a good job.

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

No written or oral comments were submitted to the DOE.

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

- With respect to the portion of comment 1 which concerns safety and security in building X660: The DOE recognizes that safety may be a concern among parents, students and staff in building X660 next year if the co-location proposal is approved. The DOE is fully committed to continuing to work closely with Grace Dodge and Crotona International staff to provide safety and security in the building for all students.

Pursuant to Chancellor's Regulation A-414, every school/campus must have a School Safety Committee. The committee plays an essential role in the establishment of safety procedures, the communication of expectations and responsibilities of students and staff, and the design of prevention and intervention strategies and programs specific to the needs of the school. The committee is comprised of various members of the school community, including Principal(s); designee of all other programs operating within the building; United Federation of Teachers ("UFT") Chapter Leader; Custodial Engineer/designee; and In-house School Safety Agent Level III. The committee is responsible for addressing safety matters on an ongoing basis and making appropriate recommendations to the Principal(s) when it identifies the need for additional security measures, intervention, training, etc.

Consistent with the process described above, the leader/designee of Crotona International will be part of the X660 building School Safety Committee. As a member of the School Safety Committee, the leader/designee of Crotona International will participate in the development of the building's Safety Plan and ensure that any security related issues or needs which may arise with respect to the co-location of Crotona International will be addressed on an ongoing basis. Moreover, the Safety Plan for the X660 school building will be modified as appropriate to meet any changing security needs associated with the co-location.

Each school building must also establish a Building Response Team that will consist of trained staff members from each of the campus' schools and programs, and which is activated when emergencies or large building-wide events occur. The members of this team must be identified and listed in the School Safety Plan.

The completed Safety Plan for the X660 school building will be submitted to the Borough Safety Directors of the Office of School and Youth Development ("OSYD") for approval. If changes or modifications are necessary, the School Safety Committee will be advised. Once the School's Safety Plan is approved, it will be submitted to the NYPD for final approval and certification by the NYPD.

The Office of School and Youth Development supports schools in maintaining a safe, orderly and supportive school environment. OSYD works directly with Children's First Network Safety Liaisons and schools to establish and implement integrated safety, discipline and intervention policies and procedures, to promote respect for diversity, and to nurture students' pro-social behavior by providing them with meaningful opportunities for social-emotional learning. The DOE encourages all schools to seek support from OSYD to address any issues involving safety and security, including gang related issues.

Furthermore, school safety agents are allocated to schools based on each building's projected enrollment. As enrollment in building X660 fluctuates in the next several years, the number of safety agents at the school will be adjusted accordingly. The NYPD School Safety Division looks at a set of variables to determine the number of safety agents to deploy to a particular school building, including the crime rate, size and design of the building, enrollment, and grade span.

- With respect to the portion of comment 1 which concerns the use of shared spaces in X660: As in other situations where schools are co-located, the schools in X660 would need to share certain large common and specialty rooms, namely the gymnasium, auditorium, and cafeteria. Specific decisions regarding the allocation of the shared spaces would be made by the Building Council, consisting of the principals from all co-located schools, in conjunction with the DOE Office of Space Planning.
- With respect to the portion of comment 1 concerning overcrowding in the hallways: The Building Council will address any issues or concerns which may arise as to overcrowding in the hallways.
- In response to comments 2 and 3, which relate to the co-location proposal's impact on Grace Dodge: The co-location of Crotona International is not expected to jeopardize student learning outcomes or undermine the existing culture established at Grace Dodge. Grace Dodge will continue to receive critical support from its Children First network team. For more information concerning the anticipated impact of the proposal on Grace Dodge, please refer to pages 3-12 of the EIS.
- With regard to comment 3, which suggests that new schools are given better resources and thus have an advantage over existing schools: New schools are funded in the same manner as existing other schools—funding follows individual students and is based on student need (incoming proficiency level, special education, English Language Learner, Title I status, etc.). While it is true that new schools receive start up funding, the start-up funding they receive is an average of \$30,000 per year over the first five years for an elementary or middle school and \$34,000 for a high school. Neither of these amounts is large enough to even cover the salary of a first year teacher. In short, this amount of money would not be able to support significant interventions to improve performance at Grace Dodge. Furthermore, principals have discretion over their school budget and make choices about how to prioritize their resources to meet the needs of their students with the right staffing, programs, and instructional priorities, all of which have an impact on school structure and performance. As stated previously in this document, Grace Dodge

will continue to receive critical support from their Children First network team during the downsizing.

- In response to comment 4 concerning the impact of the downsizing of Grace Dodge on school personnel: As stated in the EIS posted on March 2, 2011, some teachers, administrative and non-pedagogical staff at Grace Dodge may be excessed as the enrollment at Grace Dodge decreases. As stated in the EIS, the plan to reduce the enrollment at Grace Dodge would occur regardless of whether the co-location proposal is approved. This process would take place gradually as student enrollment declines with each successive graduating class. With fewer students, the school's staffing needs will naturally be reduced.

All excessing would be conducted in accordance with existing labor contracts. For example, the current UFT contract would require excessing to take place in reverse seniority order within each given teaching license area.

- With regard to comment 5, the DOE notes that Grace Dodge has not been proposed for phase-out or closure. However, the total number of students enrolled at Grace Dodge will gradually decrease to enable the school to operate more effectively. Grace Dodge will downsize its enrollment over the next four years by approximately 400-500 students until it serves approximately 816-916 students in grades 9-12 by 2014-2015. Crotona International is intended to provide an additional high-quality educational option for students and families in District 10 and the Bronx at large, but it will not serve as a replacement for Grace Dodge, which will remain co-located in the building. The downsizing of Grace Dodge would occur regardless of whether the co-location proposal is approved.
- In response to comment 6, which concerns the DOE's rationale for downsizing Grace Dodge: Grace Dodge has struggled to meet performance targets for several years. The DOE believes that by decreasing its enrollment, Grace Dodge will be able to focus attention on a smaller cohort of students, thereby enabling it to more effectively personalize instruction and serve its students.
- In response to comments 7(a) and 7(b), which relate to the number of high needs students that Grace Dodge serves: The DOE acknowledges that Grace Dodge serves a high-need population; 16% of students are English Language Learners and 21% require special education services. But other schools serving similar students have achieved far better results. For example, ACORN High School for Social Justice (16K498, "ACORN"), a Brooklyn 9-12 school in Grace Dodge's peer group, achieved a 72% four-year graduation rate in 2009-2010 compared to Grace Dodge's 46% four-year graduation rate. 4% of ACORN's students are ELLs and 20% of its students require special education services. Additionally, Belmont Preparatory High School (10X434, "Belmont"), a 9-12 school located in the Bronx and also in Grace Dodge's peer group, achieved a four-year graduation rate of 69% in 2009-2010, with 63% of students earning Regents diplomas. 18% of Belmont's students are ELLs and 17% of its students are special education students.

- With regard to comment 7(c), relating to the growing ELL population in the Grace Dodge community and the high need for ESL services: The DOE acknowledges that there is a high need for English as a Second Language services in the Grace Dodge community for immigrant students who are not proficient in the English language. The co-location of Crotona International is intended to address the needs of English Language Learners in the community. As stated earlier in this document, the new school intends to serve “newcomers” or students who are new immigrants to the country. Crotona International will be supported by Internationals Network for Public Schools in its efforts to educate newly arrived immigrants for successful lives and careers in the future.
- In response to comment 8, the DOE notes that the term “downsizing” specifically refers to the planned reduction in enrollment at Grace Dodge, but Grace Dodge will continue to serve approximately 816-916 students in grades 9-12 at the conclusion of the planned downsizing. The school will continue to offer certain Career and Technical Education programs.
- Comment 9 is in support of this proposal and therefore does not require a response.
- In response to comment 10, which concerns CTE offerings at Grace Dodge: The DOE notes that students enrolled in the CTE programs at Grace Dodge would continue to have access to necessary classes to support them as they work to meet graduation requirements and earn their high school diplomas. However, as the school’s enrollment decreases, it is possible that the availability of certain programs and course offerings will change because they depend on student interest, demand, and available resources. As discussed above, the downsizing of Grace Dodge would occur regardless of whether this proposal is approved. Additionally, the new international school plans to offer CTE programs, but the specific programs are still yet to be determined.
- With regard to comment 11, which suggests that the DOE has not provided adequate support to Grace Dodge: The DOE notes that all schools receive support and assistance from their superintendent and Children First Network team, a group of educators who work directly with schools. This team helps schools identify best practices, target strategies for specific students in need of extra help, and prioritize competing demands on resources and time. Each school community chooses the network whose support best meets its needs, and each network works to improve student achievement in all of its schools. As stated previously in this document, Grace Dodge will continue to receive critical support from their Children First network team during the downsizing.

Changes Made to the Proposal

No changes have been made to this proposal as a result of the public comments received.